BLM

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

Scoping Summary Report for the Eastern Colorado Resource Management Plan

October 2015

PREPARING OFFICE

U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office

Scoping Summary Report for the Eastern Colorado Resource Management Plan

Prepared by
U.S. Department of the Interior
Bureau of Land Management
Royal Gorge Field Office

October 2015

This page intentionally
left blank

Table of Contents

Acronyms and Abbreviations xiii

1. Introduction 1

1.1. Background 1
1.2. Purpose of and Need for the Resource Management Plan 1
1.3. Description of the Planning Area and Decision Area 2
1.4. Description of the Public Involvement Process 6
1.5. Description of the Scoping Process 7
1.5.1. Notice of Intent 8
1.5.2. Project Website 8
1.5.3. Mailing List, Postcard, and Newsletter 8
1.5.4. BLM Press Releases 9
1.5.5. Other Media Releases and Articles 9
1.5.6. Public Scoping Meetings 9
1.6. Cooperating Agency Coordination 10
1.7. Collaboration and Consultation with Tribes 11
1.8. Resource Advisory Council Coordination 12

2. Comment Summary 13

2.1. Method of Comment Collection and Analysis 15
2.2. Summary of Public Comments 15
2.2.1. Written Submissions by Affiliation 15
2.2.2. Commenters by Geographic Area 16
2.2.3. Number of Comments by Process Category 16
2.2.4. Number of Comments by Planning Issue Category 17
2.3. Planning Issues 18
2.3.1. Issues Identified in both Internal and Public Scoping 19
2.3.1.1. Air 19
2.3.1.2. Climate Change 19
2.3.1.3. Water 20
2.3.1.4. Soil 20
2.3.1.5. Geology 20
2.3.1.6. Vegetation, including Riparian Areas and Invasive Species 21
2.3.1.7. General Fish and Wildlife 22
2.3.1.8. Special Status Species 23
2.3.1.9. Cultural Resources 23
2.3.1.10. Paleontological Resources 24
2.3.1.11. Visual Resources 24
2.3.1.12. Fire 24
2.3.1.13. Lands with Wilderness Characteristics 25
2.3.1.14. Forestry 25
2.3.1.15. Livestock Grazing 25
2.3.1.16. Recreation and Visitor Services 26

2.3.1.17. Travel and Trails Management 26
2.3.1.18. Lands and Realty 27
2.3.1.19. Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials 27
2.3.1.20. Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers 28
2.3.1.21. Socioeconomics and Environmental Justice 29
2.3.1.22. Hazardous Materials and Public Health and Safety 30
2.3.1.23. Noise 30
2.4. Decisions to be Made in the Resource Management Plan 30
2.5. Topics That Will Not be Addressed in the Resource Management Plan 31
2.5.1. Issues Resolved through Policy or Administrative Action 31
2.5.2. Issues beyond the Scope of this Resource Management Plan 32
2.6. Valid Existing Management to be Carried Forward 32
2.7. Congressional and Administrative Designations, Including Nominations 32

3. Planning Criteria 35

3.1. Preliminary Planning Criteria 37
3.2. Additional Suggestions for Planning Criteria 37

4. Data Summary and Gaps 39

4.1. Summary of Available Relevant Information 41
4.1.1. Plans and Documents 41
4.1.2. Recent Data Collection 42
4.1.3. Data Gaps 43
4.1.4. Additional Information Identified During Scoping 43

5. Summary of Future Steps in the Planning Process 45

5.1. Summary of Future Steps and Public Participation Opportunities 47
5.2. BLM Contact Information 47

6. References 49

Appendix A. Scoping Materials 53

Appendix B. Scoping Comments and Summaries 125

B.1. Planning Issues 126
B.1.1. Air 126
B.1.1.1. Air - Alternatives 126
B.1.1.2. Air - Baseline Affected Environment 128
B.1.1.3. Air - Impacts 130
B.1.1.4. Air - Mitigation Measures 134

B.1.2. Climate Change 136
B.1.2.1. Climate Change - Alternatives 136
B.1.2.2. Climate Change - Baseline Affected Environment 143
B.1.2.3. Climate Change - Impacts 145
B.1.2.4. Climate Change - Mitigation Measures 148
B.1.3. Noise 148
B.1.3.1. Noise - Alternatives 148
B.1.3.2. Noise - Baseline Affected Environment 151
B.1.3.3. Noise - Impacts 155
B.1.4. Water 157
B.1.4.1. Water - Alternatives 157
B.1.4.2. Water - Baseline Affected Environment 162
B.1.4.3. Water - Impacts 172
B.1.4.4. Water - Mitigation Measures 180
B.1.5. Soil 190
B.1.5.1. Soil - Alternatives 190
B.1.5.2. Soil - Impacts 191
B.1.6. Geology 191
B.1.6.1. Geology - Baseline Affected Environment 191
B.1.7. General Vegetation 192
B.1.7.1. General Vegetation - Alternatives 192
B.1.7.2. General Vegetation - Baseline Affected Environment 193
B.1.8. Riparian and Wetland Vegetation 194
B.1.8.1. Riparian and Wetland Vegetation - Alternatives 194
B.1.8.2. Riparian and Wetland Vegetation - Baseline Affected Environment 198
B.1.9. Noxious Weeds and Invasive Species 199
B.1.9.1. Noxious Weeds and Invasive Species - Alternatives 199
B.1.9.2. Noxious Weeds and Invasive Species - Baseline Affected Environment 200
B.1.9.3. Noxious Weeds and Invasive Species - Impacts 200
B.1.10. General Fish and Wildlife 202
B.1.10.1. General Fish and Wildlife - Alternatives 202
B.1.10.2. General Fish and Wildlife - Baseline Affected Environment 218
B.1.10.3. General Fish and Wildlife - Impacts 228
B.1.10.4. General Fish and Wildlife - Mitigation Measures 233
B.1.11. Special Status Species 235
B.1.11.1. Special Status Species - Section 7 235
B.1.11.2. Special Status Species - Alternatives 235
B.1.11.3. Special Status Species - Baseline Affected Environment 239
B.1.11.4. Special Status Species - Impacts 245
B.1.11.5. Special Status Species - Mitigation Measures 246
B.1.12. Cultural Resources 246
B.1.12.1. Cultural Resources - Alternatives 246
B.1.12.2. Cultural Resources - Baseline Affected Environment 250
B.1.13. Visual Resources 251
B.1.13.1. Visual Resources - Alternatives 251
B.1.13.2. Visual Resources - Baseline Affected Environment 260
B.1.13.3. Visual Resources - Impacts 261
B.1.14. Fire 262
B.1.14.1. Fire - Alternatives 262

B.1.15. Lands with Wilderness Characteristics 265
B.1.15.1. Lands with Wilderness Characteristics - Alternatives 265
B.1.15.2. Lands with Wilderness Characteristics - Baseline Affected Environment 289
B.1.15.3. Lands with Wilderness Characteristics - Impacts 310
B.1.15.4. Lands with Wilderness Characteristics - Nominations 316
B.1.16. Forestry 339
B.1.16.1. Forestry - Alternatives 339
B.1.17. Livestock Grazing 340
B.1.17.1. Livestock Grazing - Alternatives 340
B.1.17.2. Livestock Grazing - Baseline Affected Environment 344
B.1.17.3. Livestock Grazing - Impacts 347
B.1.18. Recreation and Visitor Services 347
B.1.18.1. Recreation and Visitor Services - Alternatives 347
B.1.18.2. Recreation and Visitor Services - Baseline Affected Environment 357
B.1.18.3. Recreation and Visitor Services - Impacts 361
B.1.18.4. Recreation and Visitor Services - Mitigation Measures 362
B.1.18.5. Recreation and Visitor Services - Nominations 363
B.1.19. Travel and Trails Management 376
B.1.19.1. Travel and Trails Management - Alternatives 376
B.1.19.2. Travel and Trails Management - Baseline Affected Environment 394
B.1.19.3. Travel and Trails Management - Impacts 395
B.1.20. Lands and Realty - Corridors 395
B.1.20.1. Lands and Realty - Corridors - Alternatives 395
B.1.21. Lands and Realty - Land Tenure 398
B.1.21.1. Lands and Realty - Land Tenure - Alternatives 398
B.1.21.2. Lands and Realty - Land Tenure - Baseline Affected Environment 405
B.1.21.3. Lands and Realty - Land Tenure - Impacts 407
B.1.22. Lands and Realty - Renewable Energy 408
B.1.22.1. Lands and Realty - Renewable Energy - Alternatives 408
B.1.23. Lands and Realty - Withdrawals 411
B.1.23.1. Lands and Realty - Withdrawals - Alternatives 411
B.1.24. General Minerals and Energy 412
B.1.24.1. General Minerals and Energy - Alternatives 412
B.1.24.2. General Minerals and Energy - Baseline Affected Environment 424
B.1.24.3. General Minerals and Energy - Impacts 426
B.1.25. Fluid Minerals - Oil and Gas 430
B.1.25.1. Fluid Minerals - Oil and Gas - Master Leasing Plans 430
B.1.25.2. Fluid Minerals - Oil and Gas - Alternatives 462
B.1.25.3. Fluid Minerals - Oil and Gas - Baseline Affected Environment 508
B.1.25.4. Fluid Minerals - Oil and Gas - Reasonably Foreseeable Development Scenario 515
B.1.25.5. Fluid Minerals - Oil and Gas - Split Estate 518
B.1.25.6. Fluid Minerals - Oil and Gas - Impacts 520
B.1.25.7. Fluid Minerals - Oil and Gas - Hydraulic Fracturing 559
B.1.25.8. Fluid Minerals - Oil and Gas - Mitigation Measures 574
B.1.26. Coal 576
B.1.26.1. Coal - Impacts 576
B.1.27. Locatable Minerals 579

B.1.27.1. Locatable Minerals - Alternatives 579
B.1.28. Mineral Materials 584
B.1.28.1. Mineral Materials - Baseline Affected Environment 584
B.1.28.2. Mineral Materials - Impacts 584
B.1.29. Areas of Critical Environmental Concern 585
B.1.29.1. Areas of Critical Environmental Concern - Alternatives 585
B.1.29.2. Areas of Critical Environmental Concern - Nominations 589
B.1.30. National Trails 615
B.1.30.1. National Trails - Alternatives 615
B.1.31. Wilderness and Wilderness Study Areas 616
B.1.31.1. Wilderness and Wilderness Study Areas - Alternatives 616
B.1.32. Wild and Scenic Rivers 618
B.1.32.1. Wild and Scenic Rivers - Alternatives 618
B.1.33. Socioeconomics and Environmental Justice 621
B.1.33.1. Socioeconomics and Environmental Justice - Baseline Affected Environment 621
B.1.33.2. Socioeconomics and Environmental Justice - Impacts 635
B.1.34. Hazardous Materials and Public Health and Safety 650
B.1.34.1. Hazardous Materials and Public Health and Safety - Impacts 650
B.2. Planning Process 652
B.2.1. Planning 2.0 652
B.2.2. Planning Criteria 669
B.2.3. Scoping Process 675
B.2.4. Consistency with State, Local, and Tribal Plans and Policies 676
B.2.5. Cooperating Agencies 682
B.2.6. General NEPA Requirements 685
B.2.7. Laws and Regulations 689
B.2.8. Supplemental Rules 697
B.2.9. Monitoring 698
B.3. Other General RMP Comments 699
B.3.1. General Plan Comments 699

Appendix C. List of Commenters 715

This page intentionally
left blank

List of Figures

Figure 1.1. BLM-Administered Lands in the Royal Gorge Field Office 4
Figure 1.2. BLM-Administered Federal Mineral Estate in the Royal Gorge Field Office 5

This page intentionally
left blank

List of Tables

Table 1.1. Surface Ownership/Management and Federal Mineral Estate in the Planning Area (RGFO) 3
Table 1.2. Scoping Meetings 9
Table 1.3. Cooperating Agencies 11
Table 2.1. Submissions by Affiliation 15
Table 2.2. Commenters from Counties with Lands in the Planning Area 16
Table 2.3. Commenters from Areas Outside the Planning Area 16
Table 2.4. Comments by Process Category: Topics that Will be Addressed in the RMP 17
Table 2.5. Comments by Process Category: Topics that Will Not be Addressed in the RMP 17
Table 2.6. Comments by Planning Issue Category 17
Table 4.1. Relevant Plans and Amendments 41
Table C.1. Form Letter Submissions by Organization 726

This page intentionally
left blank

Acronyms and Abbreviations

ACEC Area of critical environmental concern

BLM United States Department of the Interior, Bureau of Land Management

BMP Best management practice

CEQ Council on Environmental Quality

CFR Code of Federal Regulations

EIS Environmental impact statement

FLPMA Federal Land Policy and Management Act of 1976

MOU Memorandum of understanding

NEPA National Environmental Policy Act of 1969

NOI Notice of Intent

RAC Resource Advisory Council

RGFO Royal Gorge Field Office

RMP Resource management plan

U.S. United States

WSA Wilderness Study Area

This page intentionally
left blank

Chapter 1. Introduction

This page intentionally
left blank

1.1. Background

The United States (U.S.) Department of the Interior, Bureau of Land Management (BLM), Royal Gorge Field Office (RGFO) has initiated a land use planning process that will cover all BLM-administered lands and Federal mineral estate in the RGFO. The BLM currently administers public lands within the RGFO boundary through two resource management plans (RMPs) and associated amendments: the Northeast RMP (BLM 1986), as amended in 1991 by the Oil and Gas Amendment (BLM 1991), and the Royal Gorge RMP (BLM 1996), as amended by the South Park Land Tenure Adjustment Plan (BLM 2005a) and four travel management plans. The BLM's current management decisions are based on the records of decision for each of these respective plans. The new RMP, called the Eastern Colorado RMP, will combine both of the original planning areas into one cohesive plan. The new Browns Canyon National Monument will not be part of this planning effort and will undergo its own planning process.

Under the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Council on Environmental Quality's (CEQ) regulations implementing NEPA (40 CFR 1500-1501), Federal agencies are required to consider the environmental effects of their actions prior to taking such actions. Actions that are subject to NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by Federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR 1508.18). The actions proposed by the BLM as part of the Eastern Colorado RMP are subject to the requirements of NEPA and other applicable laws. Pursuant to NEPA, the BLM will prepare an environmental impact statement (EIS) jointly with the Eastern Colorado RMP.

1.2. Purpose of and Need for the Resource Management Plan

The Federal Land Policy and Management Act of 1976 (FLPMA) requires that the BLM "develop(s), maintain(s), and, when appropriate, revise(s) land use plans" (43 U.S. Code 1712 [a]). As a result of new and complex issues arising since the last land use plan revision, the BLM finds it necessary to revise the current RMPs (BLM 1986, 1996). As the planning process progresses, the BLM will further refine and focus the purpose of and need for the RMP revision. There will be opportunities for public involvement, such as scoping and envisioning, which will allow the BLM to focus on what it is trying to achieve and what the priorities are. The RGFO currently operates under the guidance of two RMPs, the Royal Gorge Resource Area RMP (BLM 1996) and the Northeast RMP (BLM 1986). In 1992, the Royal Gorge Resource Area, managing the southeast portion of Colorado, administratively absorbed the Northeast Resource Area, which managed the northeast portion of Colorado. Currently, the BLM-administered lands and Federal mineral estate of the eastern half of Colorado are administered by the RGFO. The purpose of this RMP revision is to consolidate and update management under a single RMP.

The new RMP will provide updated planning-level analysis and decisions in response to new challenges and changing conditions not only on a local and regional scale, but also on a national scale. These planning-level decisions will lay the groundwork for the BLM Royal Gorge Field Manager to make informed implementation-level decisions. Major goals and objectives of the RMP revision include the following:

- To consider a master leasing plan for South Park and to re-examine the fluid mineral objectives to balance energy needs with environmental stewardship

- To effectively manage the ever-increasing pressures of the recreational community on BLM-administered lands
- To address the complexities of growing populations and their interface with BLM-administered lands
- To maintain and promote wildlife and land health while embracing the concepts of multiple use and sustained yield
- To evaluate land tenure adjustments, split estate, withdrawals, and utility/energy corridors

1.3. Description of the Planning Area and Decision Area

The planning area is the geographical area about which the BLM will make decisions during the land use planning effort. The planning area boundary includes all lands regardless of jurisdiction; however, the BLM will only make decisions on lands that fall under the BLM's jurisdiction (including subsurface Federal minerals).

The planning area is the RGFO. It is bordered on the west by the Pike-San Isabel and Arapahoe-Roosevelt National Forests, on the north by Wyoming, on the east by Nebraska and Kansas, and on the south by New Mexico and Oklahoma. The RGFO is east of the Continental Divide within the BLM Front Range District (it excludes the San Luis Valley Field Office, also located east of the Continental Divide in Colorado). The RGFO lies within three ecological provinces of Eastern Colorado: the Southern Rocky Mountain province, the High Plains province, and the Southwestern Tablelands province. BLM-administered lands within the planning area vary from short grass prairie (less than 4,000-foot elevation) to alpine tundra (greater than 14,000-foot elevation). The area has varied topography, climate, geology, soil, and flora and fauna, including prairie, riparian habitat, high-elevation parks, pinyon-juniper woodlands, mountain shrublands, ponderosa pinelands, spruce-fir forests, and alpine tundra.

The planning area encompasses approximately 35.6 million acres of Federal, State, and private lands in the following 38 counties: Adams, Arapahoe, Baca, Bent, Boulder, Broomfield, Chaffee, Cheyenne, Clear Creek, Crowley, Custer, Denver, Douglas, El Paso, Elbert, Fremont, Gilpin, Huerfano, Jefferson, Kiowa, Kit Carson, Lake, Larimer, Las Animas, Lincoln, Logan, Morgan, Otero, Park, Phillips, Prowers, Pueblo, Saguache, Sedgwick, Teller, Washington, Weld, and Yuma.

Numerous distinct and diverse communities exist within the RGFO. The communities have very different economic bases, values, and resources, and include large cities, resort communities, farm and ranching communities, and other communities. Many communities and subdivisions are also in the wildland-urban interface. The planning area is crossed by major power transmission lines that are critical for maintaining service to the entire western U.S. power grid. Mineral development is also expected to continue at a rapid pace over the next decade, adding to the complexity of managing BLM-administered lands in the RGFO.

The majority of BLM-administered lands within the RGFO are in Fremont County and surrounding counties, including Chaffee, Custer, Huerfano, Lake, Park, and Teller. The Eastern Colorado RMP decision area comprises approximately 668,000 acres of BLM-administered lands (surface lands and Federal minerals) and approximately 6.5 million acres of Federal mineral estate. Table 1.1, Surface Ownership/Management and Federal Mineral Estate in the Planning Area, relays surface ownership/management and Federal mineral estate within the planning area. Figure 1.1, BLM-Administered Lands in the Royal Gorge Field Office, and Figure

1.2, BLM-Administered Federal Mineral Estate in the Royal Gorge Field Office, are a visual representation of the information in Table 1.1.

Table 1.1. Surface Ownership/Management and Federal Mineral Estate in the Planning Area (RGFO)

Surface Ownership/Management	**Acres**[a]
BLM	668,100
U.S. Bureau of Reclamation	100
U.S. Department of Defense	446,800
U.S. Fish and Wildlife Service	23,800
U.S. Forest Service	2,878,300
Bankhead-Jones Land Use (National Grasslands)	619,700
National Park Service	175,600
Other Federal	7,100
State	2,191,700
State, County, City	226,300
Private	28,365,600
Total	*35,603,000*
Federal Mineral Estate	
All Minerals[b]	6,454,200
Coal Only	436,500
Oil and Gas Only	86,700
Oil, Gas, and Coal Only	1,500
Other[c]	243,800
No Minerals	28,380,300
Total	*35,603,000*

[a]Acres are rounded to the nearest hundred.

[b]The Federal Government owns rights to all minerals (e.g., coal, oil, gas, uranium, gravel, sand, moss rock, and all others).

[c]The Federal Government owns rights to other minerals, either singly or a combination of other minerals. Other mineral includes uranium, moss rock, gravel, sand, and other minerals not listed in this table.

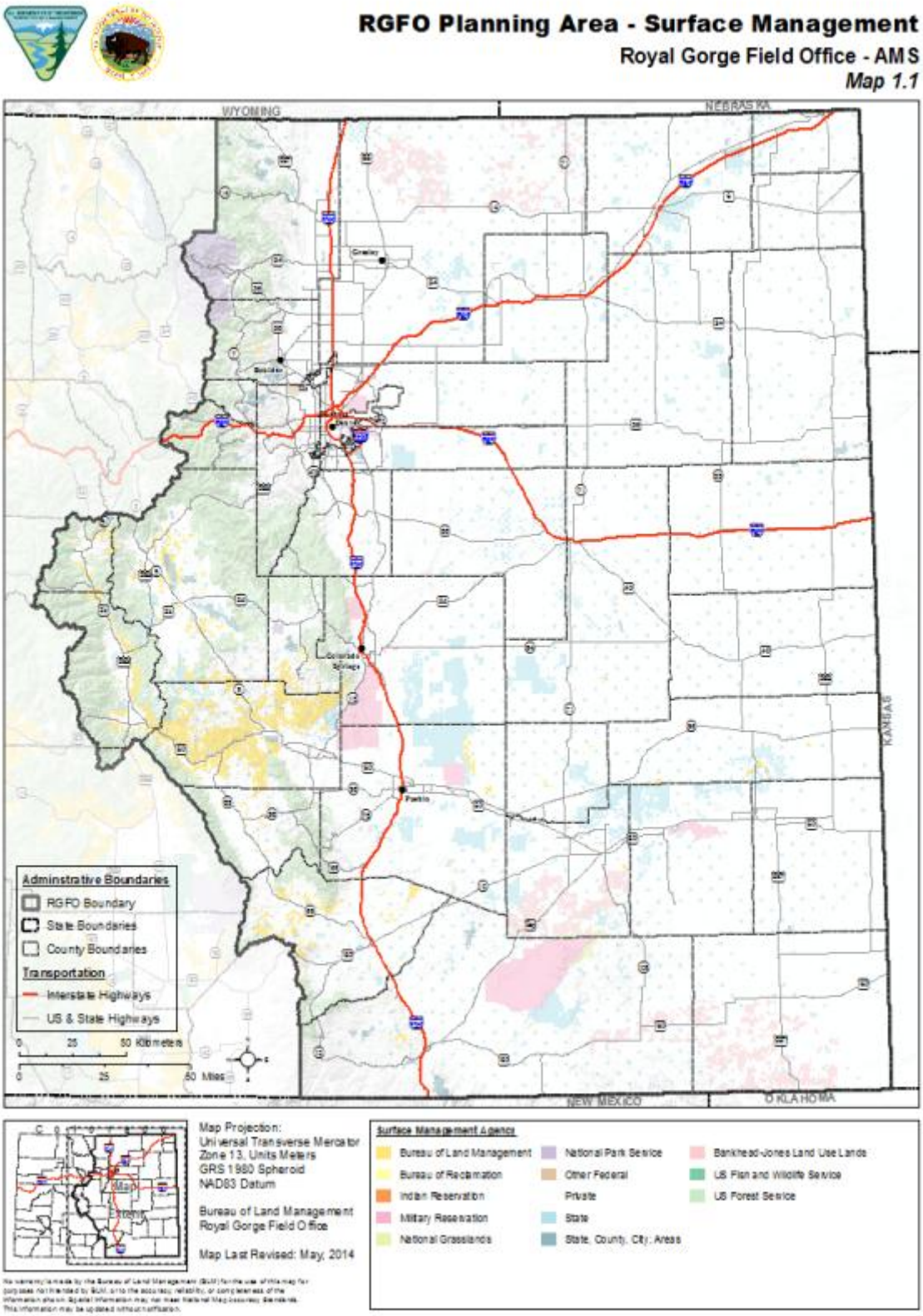


Figure 1.1. BLM-Administered Lands in the Royal Gorge Field Office

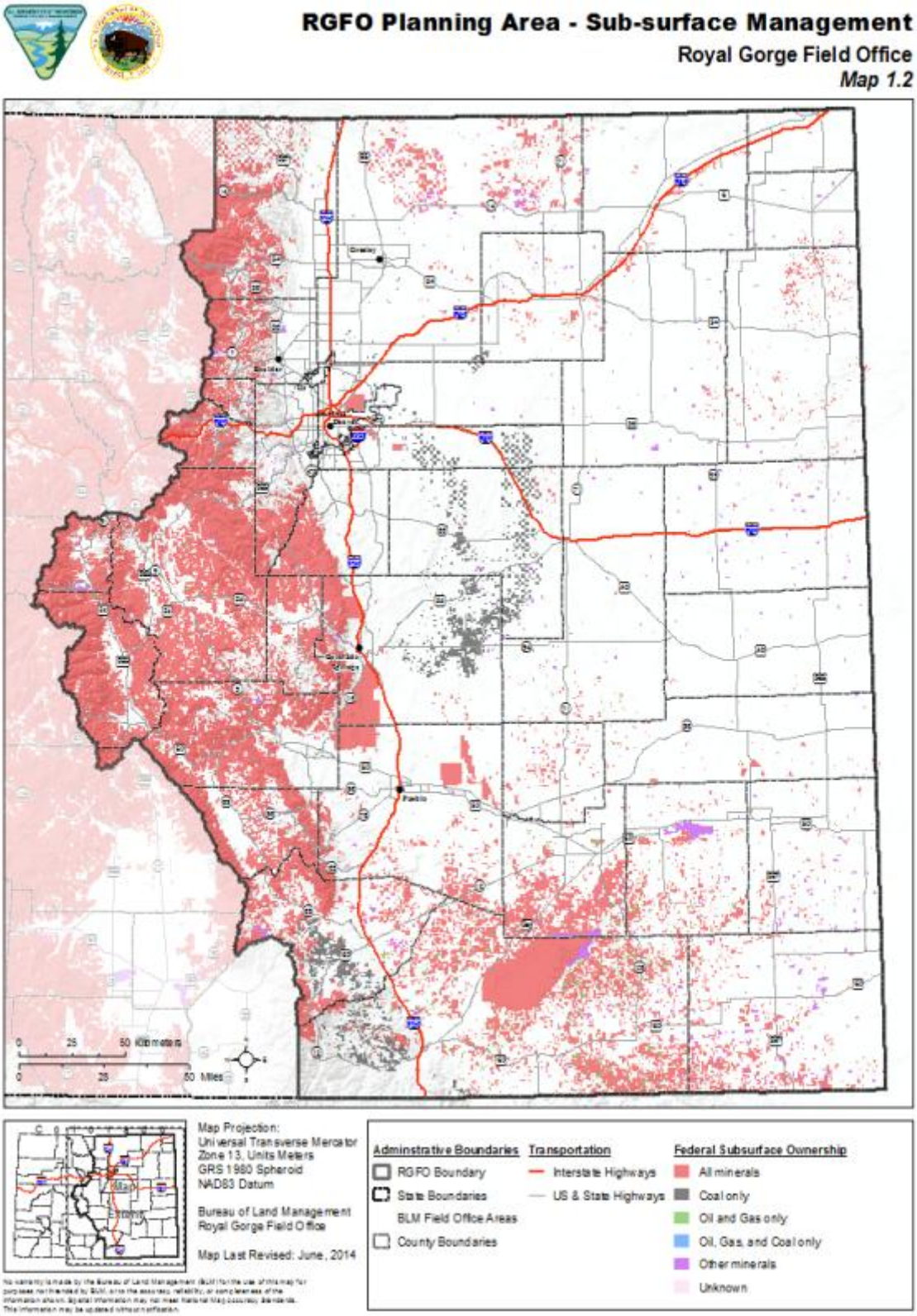


Figure 1.2. BLM-Administered Federal Mineral Estate in the Royal Gorge Field Office

1.4. Description of the Public Involvement Process

Public involvement is a vital and legal component of both the RMP and EIS processes. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR, Section 1506.6, thereby ensuring that Federal agencies make a diligent effort to involve the public in the NEPA process. Section 202 of FLPMA directs the Secretary of the Interior to establish procedures for public involvement during land use planning actions on BLM-administered lands. Guidance for implementing public involvement during land use planning actions on BLM-administered lands can be found in the BLM's Land Use Planning Handbook (H-1601-1). Public involvement requirements of both NEPA and FLPMA will be satisfied through this RMP/EIS process.

The NEPA and BLM policy require that BLM provides opportunities for the public, interest groups, other Federal agencies, Native American tribal members and governments, and State and local governments to participate meaningfully and substantively and to give comments to the BLM during the preparation of the RMP/EIS. The BLM encourages various partners, cooperating agencies, and stakeholders to become involved in the process and provide information on local and regional factors unique to the planning area. Local and regional factors include knowledge of area customs and culture, community values and traditions, and the social and economic makeup of the planning area. The BLM's goal is to consider these factors in a manner that is inclusive rather than exclusive, wherein key tribal, community, agency, and interest groups are provided with opportunities to participate in the process and are kept informed of the status of the project. The BLM must also ensure that participants are made aware of the effect their involvement will have on the final outcome; follow-through is a key element in meeting the goal of collaborative planning.

The BLM used several tools to accomplish public involvement goals. As described in the following sections, multiple avenues of outreach have been employed to connect with as many stakeholders as possible. These avenues include newsletters (hard copy and electronic), postcards, website updates, press releases, meetings, a *Federal Register* notice, newspaper advertisements, and media releases.

Public involvement for the Eastern Colorado RMP/EIS is being conducted in the following six phases:

1. Public envisioning before scoping to refine the vision for the RMP and to identify priorities and broad goals and objectives from the public's perspective

2. Public scoping before NEPA analysis begins to determine the scope of issues and alternatives to be addressed in the RMP/EIS

3. Public outreach via newsletters and news releases

4. Collaboration with Federal, State, local, and tribal governments, the Front Range Resource Advisory Council (RAC), and cooperating agencies

5. Public review of and comment on the draft alternatives report and draft impact analysis strategy report

6. Public review of and comment on the Draft RMP/EIS, which will analyze likely environmental effects and identify the BLM's preferred alternative

This scoping summary report documents the results of Phases 2 through 4 of the public involvement process. Under Phase 1, seven envisioning meetings were held in May and June 2015. The public was invited to share their vision for management of public lands and Federal minerals, and their vision for the future of their community and how BLM-administered lands and Federal minerals fit into that vision. Results of the envisioning meetings will be summarized in a separate report.

Scoping is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. Information collected during scoping may also be used to develop the alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping. Internal scoping is conducted within an agency or cooperating agencies to determine preliminary and anticipated issues and concerns. An interdisciplinary team of BLM RGFO resource specialists identified the anticipated planning issues and the methods, procedures, and data to be used in compiling the RMP/EIS. The preparation plan for the RMP included the internally identified issues, and Section 2.3.1, Issues Identified in both Internal and Public Scoping, summarizes them.

External scoping is a public process designed to reach beyond the BLM and attempts to identify the concerns of high importance to the public. External scoping helps ensure that real problems are identified early and that they are properly studied, that issues of no concern do not consume time and effort, and that the proposed action and alternatives are balanced, thorough, and able to be implemented.

In accordance with 43 CFR 1610.2(d), the BLM must document the scoping results. The BLM's land use planning guidance (Handbook H-1601-1; BLM 2005b) requires the preparation of a Scoping Summary Report to capture public input in one document. This report must summarize the separate comments received during the formal external scoping period. It also must describe the issues and management concerns from public scoping meetings, internal scoping meetings, and the pre-plan analysis and must include a discussion of how these comments will be incorporated into the RMP.

1.5. Description of the Scoping Process

The BLM follows the public involvement requirements documented in CEQ regulations implementing NEPA (40 CFR 1501.7 for scoping and 1506.6 for public involvement). The BLM also follows public involvement requirements described in the BLM's planning regulations (43 CFR 1601-1610). The BLM solicits comments from relevant agencies and the public, organizes and analyzes all comments received, and then distills them to identify issues that will be addressed during the planning process. These issues define the scope of analysis for the RMP and are used to develop the project alternatives.

The 60-day formal public scoping period as required by NEPA began on June 1, 2015, with the publication of a Notice of Intent (NOI) in the *Federal Register* (Vol. 80, No. 104, page 31063), and ended on July 31, 2015. However, comments received until August 3, 2015, are considered in this scoping summary report.

1.5.1. Notice of Intent

The NOI is the legal document notifying the public of the BLM's intent to initiate the planning process and to prepare an EIS for a major Federal action. The NOI invites the participation of the affected and interested agencies, organizations, and members of the general public in determining the scope and significant issues to be addressed in planning alternatives and analyzed in the EIS. The NOI for the Eastern Colorado RMP/EIS was published in the *Federal Register* on June 1, 2015 (Vol. 80, No. 104, page 31063). A copy of the NOI is included in Appendix A, Scoping Materials. The publication of the NOI initiated a 60-day formal public scoping period.

1.5.2. Project Website

The purpose of the Eastern Colorado RMP/EIS project website, http://on.doi.gov/1HVULcA, is to provide a one-stop ongoing resource for the public and other stakeholders to gather information about the RMP/EIS process and status. The website includes information about how to get involved, including the details of the scoping meetings. Copies of the newsletters, press releases, and all scoping materials (Appendix A) are provided on the website. The public was also able to submit input concerning the RMP/EIS via the project e-mail address (ecrmp.comments@blm.gov) and mailing address (3028 East Main Street, Cañon City, CO 81212) listed on the project website (http://on.doi.gov/1HVULcA), as well as through an ePlanning link on the RGFO website.

1.5.3. Mailing List, Postcard, and Newsletter

Prior to public scoping, the BLM compiled a mailing list of over 2,100 individuals, agencies, and organizations. In May 2015, each entity was mailed a postcard directing them to http://www.blm.gov/co/st/en/fo/rgfo.html and linked to the project website, http://on.doi.gov/1HVULcA, for additional information on the RMP process, including the newsletter, RMP process information, and envisioning and scoping meeting dates and locations. This postcard is included in Appendix A, item 5. Approximately 400 people were removed from this original mailing list due to returned undeliverable postcards.

Attendees at the scoping open houses were added to the mailing list if they wanted to receive or continue to receive project information. In addition, all individuals or organizations who submitted scoping comments were added to the mailing list. Through this process, the mailing list was revised to include approximately 10,352 entries. Contacts from three form letter campaigns (Change.org/ Western Values Project, MoveOn.org, and The Wilderness Society) were not included because either contact information could not be obtained from the organization or the organization requested contact information to be withheld; these included 6,693 contacts. Requests to be added to or to remain on the official Eastern Colorado RMP distribution list will continue to be accepted throughout the planning process.

The first project newsletter was posted to the project website (http://on.doi.gov/1HVULcA) in May 2015 and provided information on the RMP process, as well as dates and locations of the envisioning and scoping meetings. The newsletter is included in Appendix A, item 6.

1.5.4. BLM Press Releases

The BLM issued three press releases during the public scoping process. The first press release on May 6, 2015, invited the public to envisioning meetings for the Eastern Colorado RMP/EIS (Appendix A, item 2). The second announced the beginning of public scoping for the RMP/EIS and advertised the first seven scoping meetings (Appendix A, item 3). An additional press release on July 6, 2015, announced an eighth scoping meeting in Colorado Springs, Colorado (Appendix A, item 4). Press releases were posted on the RGFO website, http://www.blm.gov/co/st/en/fo/rgfo.html, the project website, http://on.doi.gov/1HVULcA, and mailed to 79 print, television, radio, and web media and congressional contacts in the planning area.

1.5.5. Other Media Releases and Articles

Several other articles were published by entities other than the BLM about the Eastern Colorado RMP/EIS scoping process. These articles provided general information about the RMP/EIS envisioning and scoping processes and how the public could get involved.

1.5.6. Public Scoping Meetings

The BLM hosted eight scoping meetings over a one-month period in June and July 2015, as described in Table 1.2, Scoping Meetings. Originally only seven meetings were planned, but in response to public feedback, the BLM hosted an additional public scoping meeting in Colorado Springs. The meetings provided the public with opportunities to become involved, to learn about the project and the planning process, to meet the BLM RGFO staff, and to offer comments. The public was notified of the public scoping meetings by the postcard direct mailing, press releases, project website, and project newsletter.

Table 1.2. Scoping Meetings

Venue	Location (Colorado)	Date	Attendees
Denver Marriott West	Golden	June 15, 2015	37
Greeley Recreation Center	Greeley	June 16, 2015	7
Salida High School	Salida	June 23, 2015	36
Fairplay Community Center	Fairplay	June 24, 2015	22
National Mining Museum	Leadville	June 25, 2015	3
The Abbey	Cañon City	June 29, 2015	56
Huerfano County Community Center	Walsenburg	June 30, 2015	28
Westside Community Center	Colorado Springs	July 14, 2015	37
Total Attendees			**226**

Most meetings were held from 5:30 p.m. to 7:30 p.m.; the Colorado Springs meeting was held from 4:30 p.m. to 7:30 p.m. Meetings were held in an open house format, which allowed the public to engage in one-on-one conversations with BLM staff. The meeting space included multiple meeting stations focused on important topics or resource areas with one or two BLM representatives at each station. Tables with information focused on the following topics were stationed around the meeting space:

- Sign in

- Overview of RMP and NEPA process
- Minerals
- Special designations, lands with wilderness characteristics
- Recreation, visual resources, and travel management
- Forestry, fire/fuel management
- Lands and realty, renewable energy
- Wildlife, fisheries, and special status species
- Air quality, water, and riparian resources
- Vegetation and livestock grazing
- Socioeconomics, cultural resources, and tribal concerns
- Commenting

During the open house, at approximately 6:30 p.m., the BLM gave a Microsoft PowerPoint presentation (Appendix A, item 8) followed by a question and answer period with attendees. The PowerPoint presentation was given by Mr. Keith Berger, BLM Royal Gorge Field Manager, and included background information on RMPs and an overview of the RMP and scoping process. Attendees also had the opportunity to make informal oral comments and were encouraged to submit them in writing if they wanted them in the record.

Attendees to the public scoping meetings were given an opportunity to submit written comments or via the ePlanning comment page. All comments received as part of the scoping period are included in Appendix B, Scoping Comments and Summaries.

1.6. Cooperating Agency Coordination

A cooperating agency is any Federal, State, or local government agency or Indian tribe that enters into a formal agreement with the lead Federal agency to help develop an environmental analysis. More specifically, cooperating agencies "work with the BLM, sharing knowledge and resources, to achieve desired outcomes for BLM-administered lands and communities within statutory and regulatory frameworks" (BLM Land Use Planning Handbook H-1601-1; BLM 2005b). The benefits of enhanced collaboration among agencies in preparing NEPA analyses are:

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

All eligible Federal agencies, State and local governments, and Federally recognized Indian tribes were invited to participate as cooperating agencies in the development of the Eastern Colorado RMP/EIS. The BLM invited 93 agencies that were eligible for cooperating agency status. As of

September 17, 2015, 26 agencies have agreed to participate in the RMP as designated cooperating agencies, and 12 have signed memoranda of understanding (MOUs) with the RGFO. The BLM hosted one cooperating agency meeting during the scoping period at the BLM RGFO in Cañon City, Colorado, on July 9, 2015. Table 1.3, Cooperating Agencies, lists the cooperating agencies and whether they attended this meeting.

Table 1.3. Cooperating Agencies

Agencies that Have Accepted as of September 2015	MOU Signed	Attended July 9, 2015 Meeting
Aurora Water	X	X
Chaffee County Commissioners	X	X
Colorado Department of Natural Resources – Executive Directors Office	X	X
Colorado Department of Public Health and Environment	X	X
Colorado Springs Utilities		X
Crowley County Commissioners	X	X
Denver Water		X
Fremont County Commissioners	X	X
Lake County Commissioners	X	
Las Animas County	X	
National Forest Service (Pike and San Isabel National Forests; Cimarron and Comanche National Grasslands)	X	X
National Park Service	X	X
Park County Commissioners	X	X
Pueblo Board of Water Works	X	X
Town of Buena Vista	X	X
Town of Westcliffe	X	
Upper Arkansas Water Conservancy District	X	
Upper South Platte Water Conservancy District	X	X
U.S. Army		X
U.S. Environmental Protection Agency	X	

Cooperating agencies were also encouraged to attend the scoping meetings and provide comments during the scoping period. These agencies will be engaged throughout the planning process, including during alternatives development.

1.7. Collaboration and Consultation with Tribes

Consultation with tribes is required by the National Historic Preservation Act and regulations at 36 CFR 800.2. During scoping, the BLM communicated with relevant tribes, following standard procedures. Because none of the tribes are resident in the planning area, face-to-face meetings are generally infeasible. The RGFO follows a process of communication that includes letters, website postings, emails, and phone calls. The BLM conducted two such efforts during scoping: the first to invite interested tribes to serve as cooperators (in July and August 2014) and the second to solicit interest in a possible meeting (in May and June 2015). One tribe responded to these efforts.

Tribes contacted included the Apache Tribe of Oklahoma, Cheyenne and Arapaho Tribes of Oklahoma, Cheyenne River Sioux Tribe, Comanche Nation of Oklahoma, Crow Creek Sioux Tribe, Eastern Shoshone Tribe, Jicarilla Apache Nation, Kiowa Tribe of Oklahoma, Northern Arapaho Tribe, Northern Cheyenne Tribe, Oglala Sioux Tribe, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, Southern Ute Tribe, Standing Rock Sioux Tribe, Ute Mountain Ute Tribe, and Ute Tribe (Northern Ute).

Government-to-government consultation will continue throughout the RMP/EIS process in order to ensure that the concerns of tribes are considered as the RMP/EIS is developed.

1.8. Resource Advisory Council Coordination

A RAC is a committee established by the Secretary of the Interior to provide advice or recommendations to BLM management (BLM Land Use Planning Handbook H-1601-1; BLM 2005b). A RAC is generally composed of 15 members of the public, representing different areas of expertise. The Front Range RAC provides advice and recommendations to the BLM Colorado Front Range District concerning the planning and management of the BLM-administered land resources located within the geographic area of the RGFO and the San Luis Valley Field Office. Advisory Council members are appointed to staggered three-year terms by the Secretary of the Interior. A list of potential appointees is generated by an annual public nomination process. The 15 members of the Front Range RAC operate on the principle of collaborative decision-making and strive for consensus before making official recommendations.

The BLM hosted one meeting with the Front Range RAC during the scoping period at the BLM RGFO in Cañon City, Colorado, on June 11, 2015. Future RAC meeting dates will be posted on the RGFO home page (http://www.blm.gov/co/st/en/fo/rgfo.html).

Chapter 2. Comment Summary

This page intentionally
left blank

2.1. Method of Comment Collection and Analysis

All written submissions postmarked or received on or before August 3, 2015, are documented in this Scoping Summary Report. Submissions received after this date are not incorporated into this report; however, these and any other comments received during the RMP process will be considered in RMP alternatives formulation and project planning.

Written comments were collected via ePlanning, comment letters, and e-mail. All comments were categorized into the BLM's CommentWorks database and sorted according to analysis topic. Information from these comments, including key issues, data, and other information from the public, was queried to prepare this Scoping Summary Report. The most common format used for submissions was e-mail. Submissions were also delivered in person at the public scoping meetings or mailed via U.S. Mail. In addition, some submissions were hand-delivered to RGFO. A list of commenters is provided in Appendix C, List of Commenters.

2.2. Summary of Public Comments

At total of 329 commenters (Appendix C, List of Commenters) submitted either individual unique comments or submitted form letters with additional unique substantive text (260 individuals submitted individual unique comments; 62 individuals submitted form letters with additional unique substantive text; 7 individuals submitted both). These commenters submitted 396 submissions. Most written submissions included more than one comment, so the 396 submissions yielded 1,626 discrete comments. Approximately 91.4 percent of these comments were related to topics that will be addressed in the RMP and EIS.

A total of 16,011 people signed form letters from 10 form letter campaigns (Appendix C, List of Commenters, Table C.1, Form Letter Submissions by Organization). Of these, 69 people submitted form letters with additional substantive text; 15,942 submitted only form letters or form letters with additional nonsubstantive text.

2.2.1. Written Submissions by Affiliation

Table 2.1, Submissions by Affiliation, shows the number of written submissions received from each type of affiliation. Submissions on business, agency, or organization letterhead, or where the commenter signed using their official agency title, were considered to represent that organization. All other submissions were considered to represent individuals. Members of the general public provided 78 percent of the written submissions, nonprofit or citizen groups submitted 17 percent, and representatives from the commercial sector submitted 3 percent. Federal agencies submitted 2 written submissions (0.5 percent), State agencies submitted 2 written submissions (0.5 percent), and local governmental agencies submitted 5 written submissions (1 percent), for a total of 2 percent of the submissions from government. No written submissions were received from tribal governments or elected officials. A list of commenters and, if applicable, their affiliations, is provided in Appendix C, List of Commenters.

Table 2.1. Submissions by Affiliation

Affiliation	Number of Submissions[a]
Individual	307
Commercial Sector	11

Affiliation	Number of Submissions[a]
Nonprofit/Citizen Group	69
Federal Agency	2
State Agency	2
City/County Government	5
Total	**396**

[a]In this table, submissions include those from commenters who submitted individual unique comments and commenters who submitted form letters with additional unique substantive text. Some commenters submitted multiple submissions; some submissions had multiple commenters. These cases were counted as separate submissions with an according affiliation; therefore, the total number is not representative of the total number of commenters.

2.2.2. Commenters by Geographic Area

Table 2.2, Commenters from Counties with Lands in the Planning Area, and Table 2.3, Commenters from Areas Outside the Planning Area, shows the number of commenters by their geographic location relative to the planning area. A total of 205 commenters (62 percent) were from counties within the planning area. Denver County (39 commenters, 12 percent) had the highest proportion of commenters within the planning area, followed by El Paso County (30 commenters, 9 percent) and Boulder County (26 commenters, 8 percent). Of the remaining commenters, 20 (6 percent) were from other counties in Colorado outside the planning area. A total of 24 commenters (7 percent) came from other states, including California, Illinois, Indiana, Maryland, Minnesota, Montana, New Mexico, New York, Oregon, Texas, Wisconsin, Wyoming, and Washington, DC. A total of 80 of the commenters (24 percent) did not indicate a geographic origin.

Table 2.2. Commenters from Counties with Lands in the Planning Area

Counties with Lands in the Planning Area	Number of Commenters
Boulder County	26
Chaffee County	21
Denver County	39
El Paso County	30
Jefferson County	22
Other counties in the planning area	67
Total Commenters in the Planning Area[a]	**205**

[a]80 commenters did not list a geographic origin; as a result, the totals do not equal total commenters.

Table 2.3. Commenters from Areas Outside the Planning Area

Areas Outside the Planning Area	Number of Commenters
Other Colorado counties	20
Other states	24
Total Commenters Outside the Planning Area[a]	**44**

[a]80 commenters did not list a geographic origin; as a result, the totals do not equal total commenters.

2.2.3. Number of Comments by Process Category

Table 2.4, Comments by Process Category: Topics that Will be Addressed in the RMP, and Table 2.5, Comments by Process Category: Topics that Will Not be Addressed in the RMP, shows the number and proportion of comments that will or will not be addressed in the RMP. Of the 1,626 total comments received, 1,486 (91.4 percent) were related to a topic that will be addressed in the RMP/EIS. These comments fall within three subcategories: comments related to planning

issues, comments related to the planning process, and other general RMP comments. Comments related to a planning issue are discussed in Section 2.2.4, Number of Comments by Planning Issue Category. Comments related to the planning process include comments on the BLM's Planning 2.0 process; planning criteria; scoping process; consistency with State, local, and tribal plans or policies; cooperating agency involvement; planning regulations; supplemental rules; general NEPA requirements; laws and regulations; monitoring; and literature references.

A total of 140 comments (8.6 percent) were related to a topic that will not be addressed in the RMP/EIS. These include comments on issues resolved through policy or an administrative action, issues beyond the scope of the RMP, and issues that have already been addressed. These comments are summarized in Section 2.5, Topics That Will Not be Addressed in the Resource Management Plan.

Table 2.4. Comments by Process Category: Topics that Will be Addressed in the RMP

Category	Total	Percent of Total Comments Received
Planning Issues	1,287	79.1
Planning Process	162	10.0
General Plan Comments	37	2.3
Total Comments to be Addressed	**1,486**	**91.4**

Table 2.5. Comments by Process Category: Topics that Will Not be Addressed in the RMP

Category	Total	Percent of Total Comments Received
Issues that will not be addressed in the RMP		
Issues Resolved through Policy or Administrative Action	21	1.3
Issues beyond the Scope of this RMP	119	7.3
Issues that have Already been Addressed	0	0.0
Total Comments not Addressed	**140**	**8.6**

2.2.4. Number of Comments by Planning Issue Category

Of the 1,626 comments received, 1,287 comments (79.1 percent) were related to a planning issue that will be addressed in the RMP/EIS. While some comments addressed multiple planning issues, one primary category was selected for analysis in this Scoping Summary Report. Where appropriate, comments were further categorized, and summaries were created by subcategories for resources and resource uses, such as comments related to baseline data, alternatives, impacts, and mitigation measures.

These comments were used to create the issue statements in Section 2.3, Planning Issues. A breakdown of total comments received by issue is included in Table 2.6, Comments by Planning Issue Category. Appendix B, Scoping Comments and Summaries, includes all substantive comments received related to these planning issue categories.

Table 2.6. Comments by Planning Issue Category

Planning Issue Category	Comments Received	Percent of Planning Issue Comments
Air	28	2.2
Climate Change	23	1.8

Planning Issue Category	Comments Received	Percent of Planning Issue Comments
Noise	21	1.6
Water	96	7.4
Soil	6	0.5
Geology	2	0.2
General Vegetation	7	0.5
Riparian and Wetland Vegetation	15	1.2
Noxious Weeds and Invasive Species	6	0.5
General Fish and Wildlife	89	6.9
Special Status Species (wildlife, fish, and plants)	27	2.1
Cultural Resources	9	0.7
Visual Resources	28	2.2
Fire	10	0.8
Lands with Wilderness Characteristics	198	15.4
Forestry	4	0.3
Livestock Grazing	24	1.8
Recreation and Visitor Services	77	6.0
Travel and Trails Management	42	3.2
Lands and Realty	49	3.8
General Minerals and Energy	41	3.2
Fluid Minerals	297	23.1
Coal	3	0.2
Locatable Minerals	14	1.1
Mineral Materials	3	0.2
Areas of Critical Environmental Concern (ACECs)	67	5.2
National Trails	1	0.1
Wilderness and Wilderness Study Areas (WSAs)	5	0.4
Wild and Scenic Rivers	6	0.5
Socioeconomics and Environmental Justice	80	6.2
Hazardous Materials and Public Health and Safety	9	0.7
Total Comments Related to a Planning Issue	**1,287**	

2.3. Planning Issues

The process for developing, amending, or revising an RMP begins with identifying issues (40 CFR 1501.7; 43 CFR 1610.4-1). Issues express concerns, opportunities, conflicts, and problems associated with the management of BLM-administered lands. Issues also reflect new data, new or revised policies, and changes in resource uses affecting the planning area. Management concerns are topics or points of dispute that involve a resource management activity or land use. While some concerns overlap issues, a management concern is generally more important to an individual or group, as opposed to a planning issue that has more widespread point of conflict.

Scoping is used to identify planning issues that will be addressed in the RMP/EIS. Planning issues are identified conflicts arising from existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include concerns, needs, and resource use, development, and protection opportunities for consideration in the preparation of the RMP/EIS. These issues may stem from new information or changed circumstances and the need to reassess the appropriate mix of allowable uses.

Some preliminary planning issues were identified by RGFO staff through an interdisciplinary process, some were identified during public scoping, and some were identified by both.

2.3.1. Issues Identified in both Internal and Public Scoping

This section identifies the preliminary planning issues that were identified both internally through RGFO staff input through an interdisciplinary process and externally through public scoping.

The public scoping planning issue summaries were identified based on public comments. Comment summaries for each issue, as well as full comments, are included in Appendix B, Scoping Comments and Summaries. The summaries in Appendix B were further condensed into the following planning issues.

The public comment summaries in this section do not include all individual public comments; rather, they focus on providing an overview of the overarching themes presented in the public comments. Each comment received during public scoping was reviewed and coded. Of the 1,626 total comments received, 1,287 comments (79.1 percent) were related to a planning issue that will be addressed in the RMP and EIS. These comments were used to create the following issue statements. See Table 2.6, Comments by Planning Issue Category, for a breakdown of the number of comments received for each planning issue category.

2.3.1.1. Air

Internal Scoping

- The RMP should identify management actions within BLM jurisdiction that are necessary to maintain and/or enhance air resources, including maintaining and/or improving air quality within State and Federal air quality standards and addressing actions impacting Class I airsheds.
- The RMP should identify how proposed activities will be managed in conformance with restrictions in place for nonattainment and maintenance areas.

Public Scoping

- The RMP should identify how the BLM will ensure that air quality monitoring is based on accurate baseline measurements and current air quality and meteorological data, including Colorado Air Resources Management Modeling Study analysis.
- The RMP should identify how the BLM will ensure compliance with the air MOU and all agency, State, and Federal air quality regulations, address impacts from oil and gas development on air resources, and include appropriate mitigation measures.

2.3.1.2. Climate Change

Internal Scoping

- The RMP should identify management actions and mitigation to help reduce greenhouse gas emissions from proposed alternatives.

Public Scoping

- The RMP should identify how the BLM will determine appropriate baseline data and ensure that management addresses the direct, indirect, and cumulative effects of climate change and

provides appropriate mitigation measures, while recognizing the uncertainty of some climate change studies.

2.3.1.3. Water

Internal Scoping

- The RMP should identify areas the BLM will manage to protect water quality and additional protection/BMPs are needed.
- The RMP should identify management restrictions needed to protect water quality in ephemeral, intermittent, and perennial streams, wetlands, springs, and seeps.
- The RMP should identify measures, including filing for water rights under applicable State or Federal permit procedures, needed to ensure water availability for multiple use management and functioning, healthy wetland or stream systems.
- The RMP should identify areas, such as abandoned mine lands, off-highway vehicle use, or mineral development, that need restoration to improve water quality.
- The RMP should identify watersheds that need special management or protection from the perspective of human health, ecosystem health, water quality, or other public uses. The RMP should identify priority areas on the landscape.
- The RMP should identify what, if any, area-wide use restrictions or other protective measures are needed to meet local and State water quality requirements.

Public Scoping

- The RMP should include comprehensive background water quality data, effective monitoring, and appropriate measures to limit water quality and quantity impacts from development activities.
- The RMP should identify how the BLM will disclose and mitigate potential impacts on water from hydraulic fracturing.

2.3.1.4. Soil

Internal Scoping

- The RMP should identify specific soils that need special management or protection from the perspective of human health, ecosystem health, water quality, or other public uses. The RMP should identify priority areas on the landscape.

Public Scoping

- The RMP should identify measures to benefit and/or protect soil resources.

2.3.1.5. Geology

Internal Scoping

- The RMP should identify areas that may need to be managed for geologic hazards. Identify management restrictions needed (or existing ones that need to be re-evaluated) to protect access to critical and strategic mineral supplies.

Public Scoping

- The RMP should discuss the importance of the igneous dikes in the Spanish Peaks area.

2.3.1.6. Vegetation, including Riparian Areas and Invasive Species

Internal Scoping

- The RMP should identify how the BLM will address changing vegetation composition, such as pinyon-juniper woodlands encroachment and increasing density replacing many diverse grassland communities.
- The RMP should identify measures to manage noxious weeds and aquatic nuisance species.
- The RMP should identify categorization and management strategies to manage numerous small parcels of BLM-administered land with less riparian, wetland, and aquatic habitat, or when only fractional portions of watersheds versus management strategies necessary on larger parcels.
- The RMP should address riparian area management considering changing landscapes beyond the BLM's control (e.g., rapid subdivision of adjacent ranch lands).
- The RMP should identify water flow and water right protection strategies to protect flows for BLM-administered water-dependent resources. The RMP should identify how the BLM can anticipate future water development needs to be evaluated for large rivers, creeks, small seeps, springs, and fens (many of which were developed years ago and may or may not have water rights or be functional).
- The RMP should identify how the BLM will manage resource uses that potentially indirectly affect wetland, riparian, and aquatic resources, such as obligate species disturbance, habitat fragmentation, invasive species introduction, and overland flow rate alteration.
- The BLM RGFO has recognized important values in situations of fen wetlands and playa wetlands, and added emphasis is needed for certain aquatic wildlife species since the Royal Gorge RMP (BLM 1996) was completed. The RMP should identify additional planning considerations needed to foster long-term sustainability of these less-common resources in consideration of resource uses, such as oil and gas development.
- The RMP should identify how the BLM should prepare and manage for drought conditions.

Public Scoping

- The RMP should identify the appropriate vegetation management measures to include in the range of alternatives, including, but not limited to, fire, mechanical treatments, and restoration activities?
- The RMP should identify appropriate information on the baseline status of riparian, wetland, and fen habitats and determine the appropriate measures to protect riparian areas from resource uses.

- The RMP should identify needed inventory and management actions to appropriately control and reduce the direct and indirect impacts of proposed activities on noxious weeds.

2.3.1.7. General Fish and Wildlife

Internal Scoping

- The RMP should identify management of the various multiple uses and physical and biological resources so that simultaneously those actions enhance, protect, maintain, and develop wildlife species, their populations, and their habitats for the social and economic wellbeing of the public.

- The RMP should identify the specific and appropriate standards, guidelines, stipulations, or conservation measures that will be needed for a variety of management actions (e.g., livestock grazing, oil and gas development, mining, and motorized or nonmotorized recreation) to enhance, protect, maintain, and develop wildlife species, their populations, and their habitats so they may fulfill their life history needs (e.g., reproduction) and include protection measures in those actions.

- The RMP should identify management actions to maintain large contiguous blocks of wildlife habitats, maintain wildlife movement corridors, and minimize fragmentation of those habitats so that various wildlife species can fulfill their life histories and thrive in a manner that maintains viable populations.

- The RMP should identify areas or habitat types (e.g., peregrine falcon eyries, bighorn sheep lambing, bat maternity roosts, and mule deer winter range) important to wildlife assemblages or needed so that wildlife species can fulfill their natural histories, and management actions to appropriately maintain, restore, or improve those areas.

- The RMP should identify how the BLM will manage and monitor BLM activities to meet Migratory Bird Treaty Act obligations.

- The RMP should identify the desired future conditions needed for specific wildlife species of interest, wildlife assemblages for a given environment that should be incorporated into an area-wide plan to promote biodiversity, achieve viable wildlife populations, and maintain a thriving natural ecological system.

Public Scoping

- The BLM should ensure that baseline data for wildlife habitat are complete and accurate based on the best available data.

- The BLM should ensure that the EIS includes a thorough analysis of the impacts of various multiple uses on wildlife and their habitats, and conservation measures to avoid or minimize these impacts.

- The RMP should identify appropriate measures to support habitat for big game species, including mule deer and Rocky Mountain elk.

- The RMP should identify appropriate measures to support larger habitat linkages, landscape-scale movement, and ranges.

2.3.1.8. Special Status Species

Internal Scoping

- The RMP should identify the short- and long-term desired future conditions needed to maintain viable special status species, with consideration of their populations and their habitats.
- The RMP should identify desired future conditions to meet recovery requirements for federally listed threatened, endangered, and proposed species.
- The RMP should identify how the BLM will work with other agencies and partners to conserve and recover special status species and actions that would be needed.
- The RMP should identify the long-term goals, objectives, and strategies for managing habitat for special status species, and management actions to ensure habitat is available for these species.
- The RMP should identify the appropriate mix of native vegetation types, structure, seral stage, patch size, and composition necessary across the landscapes to maintain special status species.
- The RMP should identify how the BLM will manage a site when general land health standards are met but site conditions are still such that it is not meeting functional habitat requirements for special status species.
- The RMP should identify how the BLM will manage areas that provide a unique or significant contribution toward one or more special status species.

Public Scoping

- The RMP should include a complete special status species inventory and geospatial analysis to define the scope and magnitude of sensitive wildlife habitats.
- The RMP should include the appropriate level of impacts analysis to determine potential impacts on special status species from development activities.
- The RMP should identify how the BLM will protect sensitive wildlife habitats and species during future resource development, and the monitoring measures to determine whether the RMP decisions are effective.

2.3.1.9. Cultural Resources

Internal Scoping

- The RMP should identify how the BLM will manage cultural resources to ensure they are available for appropriate use by present and future generations.
- The RMP should identify how the BLM will ensure that sites of interest are managed to allow access by present and future Native American generations.
- The RMP should identify how the BLM will ensure that Native American human remains that are discovered on BLM-administered lands are afforded proper care and respect.

Public Scoping

- The RMP should identify measures to ensure that significant cultural resources on decision area lands are identified and managed.

2.3.1.10. Paleontological Resources

Internal Scoping

- The RMP should identify where special limitations or stipulations will be applied to developments or other resource uses to protect and preserve paleontological resources. Of the paleontological resources currently being actively managed, the RMP should identify site-specific use restrictions. If so, the RMP should identify if they need to be modified to meet current conditions. For example, the Garden Park Fossil Area ACEC activity plan needs to be completed as proposed in the Royal Gorge RMP (BLM 1996), and the Garden Park Fossil Area ACEC boundary needs to incorporate newly acquired BLM-administered lands.

- The RMP should identify special designations, such as ACEC and national natural landmark designations, to promote paleontological resource preservation.

Public Scoping

- The RMP should identify measures to ensure that significant paleontological resources on decision area lands are identified and managed.

2.3.1.11. Visual Resources

Internal Scoping

- The RMP should identify management based on the new visual resource inventory.

- The RMP should identify the potential effects on the planning area's visual resources from all other BLM-administered resource programs.

Public Scoping

- The RMP should identify measures to minimize impacts on visual resources, including dark skies, particularly in undeveloped lands and for travel corridors.

- The RMP should ensure that visual resource management class assessments are up to date and accurate for the decision area.

- The RMP should analyze impacts from visual resource management decisions on BLM-administered lands to adjacent lands, including national parks, special resource areas, and private property.

2.3.1.12. Fire

Internal Scoping

- The RMP should identify where and under what conditions prescribed and managed wildfire should be used as a vegetative management tool.

- The RMP should identify how fuel management or vegetation management treatments will be used to address land health goals and fire regime condition class.
- The RMP should identify the management response to wildfires throughout the planning area.
- The RMP should identify how the BLM will address emergency stabilization and rehabilitation following wildfires.
- The RMP should identify areas, if any, for restrictions on fire management practices when needed to protect natural and cultural resource values.

Public Scoping

- The RMP should identify measures to address fuel loading and fire risk while minimizing the impacts on other resources.

2.3.1.13. Lands with Wilderness Characteristics

Internal Scoping

- The RMP should identify management of lands with wilderness characteristics and certain restrictions or allocations to protect these characteristics, or if emphasis should be placed on other uses in these areas.

Public Scoping

- The RMP should identify management to protect areas with wilderness characteristics, including those areas identified in the Wild Connections study.

2.3.1.14. Forestry

Internal Scoping

- The RMP should identify management of forest health and diversity across the landscape.
- The RMP should identify areas unavailable for commercial or personal use of forest products.

Public Scoping

- The RMP should identify measures to manage for healthy forests.

2.3.1.15. Livestock Grazing

Internal Scoping

- The RMP should identify the guiding range management principles that will be incorporated into individual permits/leases or management of allotments (e.g., utilization and administrative travel routes).
- The RMP should address conflicts with other resources in the management of livestock grazing allotments.

- The RMP should identify amount of forage for livestock (animal unit months) available for future anticipated demands, while maintaining a thriving natural ecological balance and multiple uses.
- The RMP should identify how lands will be managed toward meeting land health standards using the standards and guides of livestock grazing as a tool.

Public Scoping

- The RMP should identify management actions to support continued use of BLM-administered lands for livestock grazing, while minimizing impacts on other resources.

2.3.1.16. Recreation and Visitor Services

Internal Scoping

- The RMP should identify how the BLM will resolve conflict between increasing recreation demand, conflicts between recreation uses, and other resource values.
- The RMP should identify areas that should receive special use restrictions for certain types of recreation, such as target shooting, overnight use, or campfires, to reduce conflicts with neighboring private lands.
- The RMP should identify areas for focused recreation management, including desired settings of these areas.

Public Scoping

- The RMP should identify management actions and special recreation areas to support opportunities for a variety of recreational activities, while limiting the impact on other resources.
- The RMP should identify management and analyze impacts of recreation activities (e.g., target shooting, OHV travel, and camping) and develop specific mitigation measures to minimize those impacts.
- The RMP should identify the level of developed facilities that the BLM will provide.

2.3.1.17. Travel and Trails Management

Internal Scoping

- The RMP should identify how the BLM will manage the travel network to reduce conflicts among resources and resource uses and to provide access where needed.

Public Scoping

- The RMP should identify travel management decisions to support public access and motorized use, while limiting the impacts on other resources and resource uses, including quiet recreational settings.
- The RMP should address travel management issues and support consistency with adjacent land management.

- The RMP should identify information the BLM has or will collect to support travel management decisions.

2.3.1.18. Lands and Realty

Internal Scoping

- The RMP should identify lands for retention, disposal, or acquisition in order to meet resource goals/objectives and improve efficiencies of management.
- The RMP should address the land tenure of new and existing Recreation and Public Purposes Act leases.
- The RMP should address the need for land use authorizations (including rights-of-way, communication site leases, commercial film permits, and easements) in relation to resource protection/use to improve management efficiencies.

Public Scoping

- The RMP should identify actions the BLM will consider to identify and manage development corridors.
- The RMP should identify criteria the BLM will use to identify lands for disposal, retention, and acquisition.
- The RMP should identify measures the BLM will consider in the management of rights-of-way for renewable energy development.
- The RMP should identify areas for potential mineral entry withdrawal. (Although decisions about minerals withdrawals originate in the BLM Minerals program, they are processed by the BLM Lands and Realty program.)

2.3.1.19. Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials

Internal Scoping

- The RMP should recommend areas for withdrawal based on significant resource conflicts with locatable mineral entry and mineral exploration and/or development with consideration of special status species or other important natural resources. The RMP should identify if areas previously recommended for withdrawal but not implemented will be carried forward.
- The RMP should identify areas suitable for saleable mineral entry and saleable mineral exploration and/or development.
- The RMP should identify areas suitable for leasing or unsuitable for all or certain types of coal mining operations under Section 522(b) of the Surface Mining Control and Reclamation Act of 1977.
- The RMP should identify areas open to fluid minerals leasing.

- The RMP should identify fluid minerals lease stipulations to protect natural and cultural resources and minimize user conflicts.
- The RMP should identify specific areas open to fluid minerals leasing that are subject to no surface occupancy to protect sensitive natural and cultural resources.
- The RMP should address management of geophysical operations to protect natural and cultural resources.
- The RMP should address air quality concerns, particularly in ozone nonattainment areas, as they pertain to fluid minerals development.
- The RMP should identify management of fluid minerals development within the boundaries of the South Park Master Leasing Plan.

Public Scoping

- The RMP alternatives should include management actions for energy development, including types of energy development, permitted level of restrictions on energy development, extent of exclusion from development, or limitation on surface use.
- The RMP should include measures, management actions, and stipulations in the South Park Master Leasing Plan to limit the impacts on resources.
- The RMP should include measures to incentivize renewable energy development.
- The reasonably foreseeable development scenario should include information to reflect a realistic view of exploration and development potential in the planning area.
- The RMP should include information to represent the best available data in relation to impacts of oil and gas development, including hydraulic fracturing.
- The RMP should fully analyze the direct, indirect, and cumulative impacts of mineral and energy development.
- The RMP should include mitigation measures to limit impacts of energy development on other resources.
- The RMP should analyze and minimize potential impacts from coal development on planning area resources and public health and safety.
- The RMP management alternatives should include measures to protect surface and ground water from impacts of locatable mineral development.

2.3.1.20. Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers

Internal Scoping

- The RMP should identify management of new and existing areas that meet the relevance and importance criteria for area of critical environmental concern (ACEC) designations.

- The RMP should include management of WSAs should they be released by Congress.
- The RMP should identify which eligible river segments are suitable or unsuitable for inclusion in the Wild and Scenic Rivers System.

Public Scoping

- The RMP alternatives should consider the following areas as ACECs:
  - Arkansas Canyonlands
  - Arkansas River Corridor (North of the Arkansas River between Parkdale and Salida)
  - Beaver Creek (expansion of existing ACEC)
  - Birdseye
  - Castle Garden (near Salida)
  - Cotopaxi
  - Cucharas Canyon (expansion of existing ACEC)
  - Droney Gulch
  - Garden Park (expansion of existing ACEC)
  - Grape Creek
  - Mosquito Pass (expansion of existing ACEC)
  - Mt. Mestas
  - Mt. Ouray to Poncha Drainages (south and west of Poncha Springs)
  - North Raton Basin
  - Phantom (North of Cañon City)
  - Reinecker Ridge
  - South Badger
- The RMP should identify management in WSAs to support protection of wilderness characteristics while minimizing restrictions on other resource uses.
- The RMP should identify decisions for wild and scenic river designation and management to protect wild and scenic rivers while minimizing restrictions on other resource uses.

2.3.1.21. Socioeconomics and Environmental Justice

Internal Scoping

- The RMP should include information to accurately represent current social and economic baseline conditions and should analyze social and economic impacts of planning decisions.

Public Scoping

- The RMP should include information to accurately represent current social and economic baseline conditions and identify important industries that could be impacted by planning decisions.
- The RMP should address potential impacts on public services, quality of life, tax base, and important area industries, including oil and gas development, tourism, and ranching.

2.3.1.22. Hazardous Materials and Public Health and Safety

Internal Scoping

- The RMP should include management of areas with public safety concerns, such as abandoned mine lands and hazardous sites.
- The RMP should include management to balance public safety concerns and public demands for resource use.

Public Scoping

- The RMP should include measures to minimize the potential for impacts on public health and safety from hazardous materials associated with oil and gas development, uranium exposure, fire danger, and High Altitude Mountain Environment Training operations.

2.3.1.23. Noise

The following is a planning issue identified only in public scoping comments and not by RGFO staff. A comment summary for this issue, as well as full comments, is included in Appendix B, Scoping Comments and Summaries. The Summary in Appendix B was further condensed into the following planning issue.

- The RMP should include measures to protect areas for natural soundscape and quiet use.

2.4. Decisions to be Made in the Resource Management Plan

RMP-level decisions will identify management direction and guide BLM actions in the decision area for the coming decades. The RMP will provide a comprehensive yet flexible framework for managing the numerous demands on decision area resources.

The vision for the decision area will be described in the RMP in terms of two categories of RMP-level decisions: 1) desired outcomes; and 2) allowable uses and actions to achieve desired outcomes. Desired outcomes will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes, such as ensuring sustainable development. Standards are descriptions of conditions or the degree of function required, such as land health standards. Objectives are specific, quantifiable, and measurable desired conditions for resources. Allowable uses and actions to achieve desired outcomes will be expressed in the RMP as allowable uses, actions needed, and land tenure decisions. Livestock grazing, administrative designations (e.g., ACECs), and land disposal are examples of some RMP-level decisions in this category.

The RMP will contain broad-scale decisions that guide future land management actions. Subsequent site-specific implementation is often characterized as project-level or activity-level decisions. These decisions require a more-detailed, site-specific environmental analysis that is generally conducted after the completion of an RMP/EIS. These decisions generally constitute final approval, allowing actions to proceed (BLM Land Use Planning Handbook H-1601-1, Section IV[B]; BLM 2005b). An example of an implementation decision is the development and management of a recreation site.

This Scoping Summary Report does not make any decisions, nor does it change current management direction set forth in the current RMPs (BLM 1986 and 1996, as amended). Instead, it summarizes those issues identified during the scoping period. The BLM will use planning issues summarized in this report, along with subsequently identified issues, planning criteria, and other information, to help formulate a reasonable range of alternatives during the next phase of the RMP process. Each identified alternative, including continuation of existing management practices, will represent a complete and reasonable plan for managing the RGFO.

2.5. Topics That Will Not be Addressed in the Resource Management Plan

As described in Section 2.2.3, Number of Comments by Process Category, 140 comments (8.6 percent) will not be addressed in the RMP because they fall into one of the following process categories:

1. Issues resolved through policy or administrative action

2. Issues beyond the scope of this RMP

3. Issues that have already been addressed but should be better communicated to the issue holder

The RGFO will review these topics as they are presented during the planning process and consider ways to improve effectiveness as appropriate for the current planning process. Details for process categories 1 and 2 are included below. There were no comments received related to process category 3 (issues that have already been addressed but should be better communicated to the issue holder).

2.5.1. Issues Resolved through Policy or Administrative Action

Twenty-one comments (1.3 percent of total comments) will not be addressed in the planning process because they will be resolved through policy or administrative action. This category includes comments related to BLM national policy or decisions requiring congressional action. For example, some commenters provided input on the status of WSAs, stating that specific areas should be released from consideration. WSAs are roadless areas that have been inventoried (but not designated by Congress) and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964. Release of a WSA from consideration is determined by congressional action and is not within the scope of this planning process. Other commenters included comments on permitting of Military Operations Areas and on the planning process; these issues will be addressed at a national level.

2.5.2. Issues beyond the Scope of this Resource Management Plan

In total, 119 comments (7.3 percent of total comments) will not be addressed in the planning process because they are out of scope. These comments include issues occurring outside of the planning area, undergoing separate NEPA processes, and/or requiring implementation-level actions that will be addressed in future planning. For example, one comment related to BLM-administered lands in the Grand Junction Field Office planning area, while another related to Brown's Canyon National Monument; both of these comments are or will be addressed by separate planning processes. Multiple comments were specific to the planning area's High Altitude Mountain Environment Training. This training is being evaluated in a separate NEPA process; a draft scoping report was published in March 2015 (BLM 2015a). Other comments related to hunting permits, which are authorized by Colorado Parks and Wildlife and are outside BLM jurisdiction. Comments related to wild horses and burros management are outside the scope of the RMP because there are none in the RGFO. Comments were also received on implementation-level issues that will be addressed in site-specific NEPA analyses. Issues included forestry management implementation actions, land disposal for specific parcels, enforcement issues, and specific reclamation recommendations. Numerous comments pertained to special route designation, which will be addressed in implementation-level travel management planning after the RMP Record of Decision is signed.

2.6. Valid Existing Management to be Carried Forward

BLM-administered land in the decision area is managed according to the Northeast RMP (BLM 1986) and Royal Gorge RMP (BLM 1996), as amended. While these RMPs have been amended to incorporate reconsideration of certain management decisions, many elements of these RMPs are still relevant and remain valid. The BLM intends to carry many of these management decisions forward in the Eastern Colorado RMP. Determining which existing management decisions will be carried forward is part of the planning process. The BLM will review existing resources and resource use conditions and the existing management situation to identify which existing decisions should be carried forward and where there is an opportunity to modify existing direction or develop new management guidance. This review is documented in the BLM's Analysis of the Management Situation for the Eastern Colorado RMP (BLM 2015b).

2.7. Congressional and Administrative Designations, Including Nominations

The BLM Land Use Planning Handbook (H-1601-1; BLM 2005b) requires that application of the following administrative decisions be considered when developing an RMP: ACECs, National Historic Trails, scenic or back country byways, Special Recreation Management Areas, wild and scenic rivers, and WSAs. The special designations section of the RMP will include a discussion of currently designated areas. It also will include new special management area designations, including ACECs, and a discussion of river segments eligible and/or suitable for inclusion in the National Wild and Scenic Rivers System.

At the writing of this report, the RGFO has completed a draft wild and scenic rivers inventory, including identification of free-flowing segments and outstandingly remarkable values (BLM 2015c). As part of the Eastern Colorado RMP effort, the RGFO will finalize eligibility and potential classification and will determine suitability.

New ACEC designations and management of lands with wilderness characteristics will also be considered in RMP development. As detailed in Section 2.3, Planning Issues, and Appendix B, Scoping Comments and Summaries, comments included the following ACEC nominations:

- Arkansas Canyonlands
- Arkansas River Corridor
- Beaver Creek (expansion of existing ACEC)
- Birdseye
- Castle Garden
- Cotopaxi
- Cucharas Canyon (expansion of existing ACEC)
- Droney Gulch
- Garden Park (expansion of existing ACEC)
- Grape Creek
- Mosquito Pass (expansion of existing ACEC)
- Mt. Mestas
- Mt. Ouray to Poncha Drainages
- North Raton Basin
- Phantom
- Reinecker Ridge
- South Badger

An ACEC report is being prepared by the RGFO and will document the relevance and importance criteria findings of nominated ACECs. Its findings will be incorporated into the RMP alternatives.

A report of lands with wilderness characteristics was completed in 2013 (BLM 2013). This report documented decision area BLM-administered lands outside of WSAs that contain wilderness characteristics. The 2013 lands with wilderness characteristics report will be updated with any relevant information provided by the public. Its findings will be incorporated into the RMP alternatives.

The Brown's Canyon National Monument is not included in the Eastern Colorado RMP planning or decision areas. The Brown's Canyon National Monument will be covered under a separate management plan.

This page intentionally
left blank

Chapter 3. Planning Criteria

This page intentionally
left blank

3.1. Preliminary Planning Criteria

The BLM planning regulations (at 43 CFR 1610.4-2) require development of planning criteria to guide preparation of an RMP. Planning criteria are the standards, rules, and guidelines developed by BLM managers and interdisciplinary teams, with public input, for use in forming judgments about plan-level decisionmaking, analysis, and data collection. These criteria are used to establish the parameters or "ground rules" for making planning decisions and simplifying RMP actions. The planning criteria focus on the development of management options and alternatives, analysis of their effects, and selection of the preferred alternative and the Proposed RMP.

The following preliminary planning criteria were identified by the BLM RGFO, which are refinements of the criteria published in the NOI:

- The BLM will recognize in the RMP/EIS the special importance of BLM-administered lands to people who live in communities surrounded by BLM-administered lands and the importance of BLM-administered lands to the nation as a whole.
- The BLM will make every effort to encourage public participation throughout the RMP/EIS process.
- Environmental protection and commodity extraction are both desirable and necessary objectives of sound land management practices and are not to be considered mutually exclusive priorities.
- Broad-based public participation will be an integral part of the RMP/EIS process. Decisions in the RMP will strive to be compatible with the existing plans and policies of adjacent local, State, Federal, and tribal agencies, as long as the decisions are consistent with the purposes, policies, and programs of Federal law and regulations applicable to BLM-administered lands.
- The BLM will strive to minimize potential adverse impacts.
- The BLM will recognize and make decisions following all existing laws and regulations.
- The BLM will facilitate oil and gas development and production and provide options for flexibility to the oil and gas industry for environmentally sound exploration, development, and operations.
- A Master Leasing Plan for South Park will be considered.
- The RMP/EIS will consider management of lands bordering the decision area and will strive to harmonize management of BLM-administered lands in the decision area with adjacent lands outside the decision area.

3.2. Additional Suggestions for Planning Criteria

One commenter recommended that several Executive Orders, regulations, and U.S. Code and CFR sections be included as RMP planning criteria. These are addressed by the preliminary planning criteria that the BLM will recognize and make decisions following all existing laws and regulations.

This page intentionally
left blank

Chapter 4. Data Summary and Gaps

This page intentionally
left blank

4.1. Summary of Available Relevant Information

Both new data and existing resource information will be used to formulate management alternatives in the Eastern Colorado RMP. To facilitate this process, information is being compiled and put into digital format using geographic information systems for use in analysis and map production. Because this information is imperative to quantifying resources, updating maps, and manipulating information during alternative formulation, this process must be completed before actual analysis can begin. New data generated during the RMP process will be used to address planning issues and will meet applicable established standards.

4.1.1. Plans and Documents

The RMPs and amendments currently in place for the RGFO (i.e., the current management) will become the basis for the no action alternative in the Eastern Colorado RMP/EIS. Current management direction from an existing RMP determined to be still valid may be carried forward to the Eastern Colorado RMP as an element of an action alternative. The RMPs and amendments currently in place for the RGFO are listed in Table 4.1, Relevant Plans and Amendments.

Table 4.1. Relevant Plans and Amendments

Document	Year	Description
Royal Gorge Resource Area RMP (BLM 1996)	1996	RMP managing BLM-administered land and Federal mineral estate for southeast Colorado.
Northeast RMP (BLM 1986)	1986	RMP managing public land and Federal mineral estate for northeast Colorado.
Colorado oil and gas leasing EIS (BLM 1991)	1991	Amendment to Northeast Resource Area RMP for oil and gas leasing.
Arkansas River TMP (BLM 2008b)	2008	Amendment to travel management in the Royal Gorge Resource Area RMP for the Arkansas River subunit.
Gold Belt TMP (BLM 2004a)	2004	Amendment to travel management in the Royal Gorge Resource Area RMP for the Gold Belt subunit.
Box Creek vegetation and TMP (BLM 2004b)	2004	Amendment to vegetation and travel management decisions in the Royal Gorge Resource Area RMP for Box Creek.
South Park land tenure adjustment plan (BLM 2009a)	2009	Amendment adjusting land tenure and classification in the South Park region based on updated information and newly discovered resource values.
Amendment to standards for public land health (BLM 1997)	1997	Amendment to decisions common to all areas from prescribed fire. Formerly, prescribed fire could be used as a management tool to enhance other resources; this amendment allowed prescribed fire and prescribed natural fire to be used as a management tool to enhance other resources.
Designation of energy corridors on BLM-administered lands in 11 western states (BLM 2009b)	2009	Amendment to the Royal Gorge Resource Area RMP to designate corridors.
Fourmile TMP (BLM 2002a)	2002	Amendment to travel management in the Royal Gorge Resource Area RMP for the Fourmile subunit.
Wellsville land disposal (BLM 2002b)	2002	Amendment to Royal Gorge Resource Area RMP selling approximately 45 acres.
Garden Park and Shaws Park Acquisition Area TMP (BLM 2009c)	2009	Amendment to travel management in the Royal Gorge Resource Area RMP for the Garden Park and Shaws Park Acquisition Area.

As required by the BLM Land Use Planning Handbook (BLM 2005b), in June 2015, the BLM developed a report called the Analysis of the Management Situation (BLM 2015b). The Analysis of the Management Situation describes the current conditions and trends of the resources and resource uses/activities in the planning area. It also documents current management and opportunities for changes in management. The Analysis of the Management Situation provides the framework from which to address the planning issues through the development of alternatives. The BLM will use the Analysis of the Management Situation when developing alternatives.

4.1.2. Recent Data Collection

Data gathering for the EIS is underway and will continue throughout the Eastern Colorado RMP/EIS process. The BLM has initiated or completed the following data-collection efforts:

- A lands with wilderness characteristics assessment report on lands with wilderness characteristics outside of WSAs was completed in 2013 (BLM 2013). It will be updated with any relevant information provided by the public. Results will be incorporated into the RMP alternatives and analyzed in the EIS.
- A visual resource inventory was completed in April 2015; the results are documented in a report (Logan Simpson 2015) and will be incorporated into the RMP alternatives and analyzed in the EIS.
- A Federal coal lands review report was completed in June 2015 (Brandt 2015). It identifies lands for further consideration for Federal coal leasing. The results of this report will be incorporated into the RMP alternatives and analyzed in the EIS.
- A renewable energy potential resource model is underway and will be completed in 2015. Results will be documented in a report, incorporated into the RMP alternatives, and analyzed in the EIS.
- A mineral potential report is being prepared to assess the mineral occurrence potential (excluding oil and gas and coalbed methane resources and nonenergy gases such as helium and carbon dioxide). The results of this report will be incorporated into the RMP alternatives and analyzed in the EIS.
- A draft Wild and Scenic Rivers eligibility study report was completed in June 2015 (BLM 2015c). The BLM is considering public comment on the draft report. The final eligibility and suitability studies will be incorporated into the RMP alternatives and analyzed in the EIS.
- A Class I information inventory for cultural resources is underway and will be completed in 2015. Results will be incorporated into the RMP alternatives and analyzed in the EIS.
- A paleontological resources overview was completed in 2015; the results are documented in a report and will be incorporated into the RMP alternatives and analyzed in the EIS.
- A reasonably foreseeable development scenario report delineating areas of potential fluid minerals development (i.e., high, medium, low, and none) was completed in 2012. Results will be incorporated into the RMP alternatives and analyzed in the EIS.
- An ACEC report is being prepared and will document the relevance and importance criteria findings of nominated ACECs. Officially nominated areas will be assessed for designation as

ACECs. Its findings will be incorporated into the RMP alternatives. Refer to Section 2.7, Congressional and Administrative Designations, Including Nominations for areas nominated in public comment submission.

- An assessment of various social and economic parameters is being conducted. The RMP will follow Appendix D of the BLM's Land Use Planning Handbook (BLM 2005b) to guide the social and economic analysis for the planning area, as well as related Instruction Memoranda. This analysis will identify, describe, and analyze social and economic conditions and trends, including, but not limited to, demographics, social organization, attitudes, employment, income, and environmental justice. The Economic Profile System (county-level data and Economic Profile System Community-level data) will be updated. The IMPLAN input-output database and model will be used to describe the affected economic environment and predict economic impacts. The results are being documented in a socioeconomic baseline report that will be completed in 2015.

4.1.3. Data Gaps

Data for the EIS will be gathered throughout the Eastern Colorado RMP/EIS process to ensure that data gaps are minimized.

The BLM has identified the following data needs:

- Consultation with the State Historic Preservation Office per Section 110 of the National Historic Preservation Act of 1966 will be conducted for cultural resources; issues and management considerations provided in the analysis and consultation will be included in the RMP /EIS.
- Air quality modeling and impact analysis will be conducted, which will form the baseline of the impact analysis in the RMP/EIS.

4.1.4. Additional Information Identified During Scoping

The BLM appreciates the substantial amount of data and references received during scoping. Additional data and references identified during scoping by cooperating agencies, other organizations, and individuals will be reviewed and incorporated into the RMP/EIS, as appropriate.

This page intentionally
left blank

Chapter 5. Summary of Future Steps in the Planning Process

This page intentionally
left blank

5.1. Summary of Future Steps and Public Participation Opportunities

The assessments and studies identified in Section 4.1.3, Data Gaps, will be conducted.

The next phase of the BLM's planning process is to develop draft management alternatives based on the issues presented in Section 2.3, Planning Issues. The alternatives will address planning issues identified during scoping and will meet goals and objectives to be developed by the BLM RGFO interdisciplinary team. In compliance with NEPA, CEQ regulations, and BLM planning regulations and guidance, alternatives should be reasonable and capable of implementation. A draft alternatives report will be made available for public comment, and public meetings will be held throughout the planning area. Based on public comments, the alternatives may be changed or a new alternative developed. The BLM will also continue to meet with collaborating agencies, interested tribes, and community groups and individuals.

Then, a draft impact analysis strategy report will be made available for public comment. Based on public comments, the strategy will be revised, a detailed analysis of the alternatives will be completed, and the BLM's preferred alternative will be identified. The preferred alternative is often made up of a combination of management option components from the various alternatives to provide the best mix and balance of multiple land and resource uses to resolve the planning issues. The Draft RMP/EIS will then be published.

Although the BLM welcomes public input at any time during the planning process, the next official public comment periods will be when the draft alternatives report is available, the draft impact analysis strategy is available, and the Draft RMP/EIS is published. The draft documents will be available on the project website (see Section 1.5.2, Project Website). The availability of the Draft RMP/EIS will be announced via a Notice of Availability in the *Federal Register*, and a 90-day public comment period will follow. Public meetings will be held throughout the planning area during the comment period on the draft alternatives and during the 90-day comment period on the Draft RMP/EIS.

At the conclusion of the Draft RMP/EIS public comment period, the Draft RMP/EIS will be revised. A Proposed RMP/Final EIS will then be published. The availability of the proposed document will be announced in the *Federal Register*, and a 30-day public protest period will follow regarding the proposed planning-level decisions (43 CFR Part 1610.5.2). If necessary, a notice will be published in the *Federal Register* requesting comments on significant changes made as a result of protest. Concurrently, the Governor of Colorado will review the document for consistency with approved State and local plans, policies, and programs.

5.2. BLM Contact Information

The public is invited and encouraged to participate throughout the planning process for the Eastern Colorado RMP/EIS. The public can review the progress of the RMP/EIS at the project website (see Section 1.5.2, Project Website), which will be updated with information, documents, and announcements throughout the duration of the RMP/EIS preparation.

Those wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may email a request to ecrmp.comments@blm.gov or contact Mr. John Smeins, Eastern Colorado RMP Project Manager, BLM, 3028 East Main

Street, Cañon City, CO 81212, phone (719) 269-8581. Please provide your name, organization, mailing address, email address, and phone number, as well as the preferred method to receive information.

Chapter 6. References

This page intentionally
left blank

BLM (U.S. Department of the Interior, Bureau of Land Management). 1986. *Northeast Record of Decision and Resource Management Plan*. September 1986. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 1991. *Record of Decision, Northeast Resource Management Plan Amendment*. November 1991. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 1996. *Royal Gorge Resource Area Record of Decision and Approved Resource Management Plan*. May 1996. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 1997. *Colorado Public Land Health Standards: Decision Record and Finding of No Significant Impact and Environmental Assessment for Standards for Public Land Health and Guidelines for Livestock Grazing Management*. March 1997. U.S. Department of the Interior, Bureau of Land Management.

_____. 2002a.*Decision Record and Finding of No Significant Impact: Fourmile Travel Management Plan*. CO-200-2002-0034 EA. U.S. Department of the Interior, Bureau of Land Management, Royal Gorge Field Office.

_____. 2002b. *Environmental Assessment Record. CO-200-2001-0048 EA. Wellsville Land Sale*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management and U.S. Department of Agriculture, Forest Service. Available online: http://www.blm.gov/style/medialib/blm/co/programs/land_use_planning/rmp/archives/royal_gorge/amendments.Par.49198.File.dat/WLDPA.pdf.

_____. 2004a. *Decision Record and Finding of No Significant Impact. CO-200-2003-0090 EA. Gold Belt Travel Management Plan*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2004b. *Decision Record and Finding of No Significant Impact. CO-200-2003-0051 EA. Box Creek Vegetation and Travel Management: BLM Travel Management Portion*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2005a. *Decision Record CO-200-2005-0025 EA to Amend South Park Land Tenure Designations in the Royal Gorge Resource Management Plan*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2005b. *H-1601-1—Land Use Planning Handbook*. Release 1–1693. March 11, 2005. U.S. Department of the Interior, Bureau of Land Management.

_____. 2008a. *Manual 6840—Special Status Species Management* . Release 6-125. December 12, 2008. U.S. Department of the Interior, Bureau of Land Management.

_____. 2008b. *Decision Record CO-200-2006-0086 EA to Amend Certain Off-Highway Vehicle Designations in the Royal Gorge Resource Management Plan*. May 1, 2008. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2009a. *Decision Record CO-200-2005-0025 EA to Amend South Park Land Tenure Designations in the Royal Gorge Resource Management Plan*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2009b. *Approved Resource Management Plan Amendments/Record of Decision (ROD) for the Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States*. BLM/WO-GI-09-005-1800. January 2009. Washington, DC: U.S. Department of the Interior, Bureau of Land Management. Available online at: http://corridoreis.anl.gov/documents/docs/Energy_Corridors_final_signed_ROD_1_14_2009.pdf.

_____. 2009c. *Decision Record and Finding of No Significant Impact. CO-200-0019 EA. Environmental Assessment, Garden Park and Shaws Park Acquisition Area Travel Management Planning*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management and U.S. Department of Agriculture, Forest Service. Available online: http://www.blm.gov/co/st/en/fo/rgfo/recreation0/travel_mgmt/garden_pk-shaws_pk.html.

_____. 2012. *Manual 6320—Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process*. Release 6-130. March 15, 2012. Washington, DC: U.S. Department of the Interior, Bureau of Land Management.

_____. 2013. *Inventory of Lands with Wilderness Characteristics, 2013*. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management. Available online at:http://www.blm.gov/co/st/en/fo/rgfo/wilderness/Inventory_of_lands_with_wilderness_characteristics.html. Accessed on September 17, 2015.

_____. 2015a. *High Altitude Mountain Environment Training Draft Scoping Report*. March 2015. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2015b. *Analysis of the Management Situation for the Eastern Colorado Resource Management Plan*. June 2015, Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

_____. 2015c. *Draft Wild and Scenic Eligibility Report for the Royal Gorge Field Office*. June 2015. Cañon City, CO: U.S. Department of the Interior, Bureau of Land Management.

Brandt, L. J. 2015. *Final Coal Resource and Development Potential Report for the BLM Royal Gorge Field Office*. June 2015. Prepared for the BLM, Royal Gorge Field Office, Cañon City, CO, by Laurie J. Brandt, C.P.G.

Logan Simpson. 2015. *Visual Resource Inventory for the BLM Royal Gorge Field Office*. April 2015. Prepared for the BLM, Royal Gorge Field Office, Cañon City, CO, by Logan Simpson, Tempe, AZ.

Appendix A. Scoping Materials

Public scoping for the Eastern Colorado RMP/EIS has included a direct mailing postcard, a newsletter, eight public scoping meetings, three press releases, and a project website (http://on.doi.gov/1HVULcA). The 60-day formal public scoping period began on June 1, 2015, with the publication of an NOI in the *Federal Register* (Vol. 80, No. 104, page 31063), and ended on July 31, 2015. Comments received until August 3, 2015, are considered in this Scoping Summary Report.

Information provided to the public during the public scoping period is included in this appendix. This includes:

1. *Federal Register* Notice of Intent to prepare the Eastern Colorado RMP/EIS (Vol. 80, No. 104, page 31063, June 1, 2015) (3 pages)

2. May 6, 2015, BLM press release announcing envisioning meetings that was mailed in May 2015 to 79 print, television, radio, and web media and congressional contacts in the planning area, as well as the BLM Front Range Resource Advisory Council and was posted on the BLM's website (2 pages)

3. June 1, 2015, BLM press release announcing the first seven scoping meetings that was mailed in June 2015 to 79 print, television, radio, and web media and congressional contacts in the planning area, as well as the BLM Front Range Resource Advisory Council and was posted on the BLM's website (2 pages)

4. July 6, 2015, BLM press release announcing the eighth scoping meeting in Colorado Springs that was mailed in July 2015 to 79 print, television, radio, and web media and congressional contacts in the planning area, as well as the BLM Front Range Resource Advisory Council and was posted on the BLM's website (1 page)

5. Project postcard (2 pages)

6. Project newsletter (4 pages)

7. Public scoping meeting handouts (23 pages total). These include:

   - Project Overview (1 page)
   - Preliminary Planning Criteria (1 page)
   - Common BLM Acronyms and Abbreviations (1 page)
   - Providing Comments During Public Scoping (how to; 1 page)
   - Air Quality (1 page)
   - Cultural Resources and Tribal Concerns (1 page)
   - Fire and Fuels Management (1 page)
   - Fluid Minerals (1 page)
   - Forestry (1 page)

- Lands and Realty (1 page)
- Lands with Wilderness Characteristics (1 page)
- Master Leasing Plans (1 page)
- Recreation (1 page)
- Socioeconomic Data (4 pages)
- Environmental Justice (2 pages)
- Solid Minerals (1 page)
- Special Designations (2 pages)
- Split Estate (1 page)
- Travel Management (1 page)
- Vegetation and Livestock Grazing (1 page)
- Visual Resources (1 page)
- Water and Riparian Resources (1 page)
- Wildlife, Fisheries, and Special Status Species (2 pages)

8. Public scoping meeting presentation (24 pages)
9. Scoping comment form (2 pages)

Activity	Number of respondents	Number of responses	Completion time per response	Total annual burden hours
Revision of Award Terms (Amendment)	150	1,500	3	4,500
Performance Reports	200	3,500	8	28,000
Totals	550	7,500		125,000

III. Comments

We invite comments concerning this information collection on:

- Whether or not the collection of information is necessary, including whether or not the information will have practical utility;
- The accuracy of our estimate of the burden for this collection of information;
- Ways to enhance the quality, utility, and clarity of the information to be collected; and
- Ways to minimize the burden of the collection of information on respondents.

Comments that you submit in response to this notice are a matter of public record. We will include or summarize each comment in our request to OMB to approve this IC. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Dated: May 27, 2015.

Tina A. Campbell,

Chief, Division of Policy, Performance, and Management Programs, U.S. Fish and Wildlife Service.

[FR Doc. 2015–13089 Filed 5–29–15; 8:45 am]

BILLING CODE 4310–55–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCO956000 L14400000.BJ0000]

Notice of Filing of Plats of Survey; Colorado

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of filing of plats of survey; Colorado.

SUMMARY: The Bureau of Land Management (BLM) Colorado State Office is publishing this notice to inform the public of the official filing of the survey plat listed below. The plat will be available for viewing at *http://www.glorecords.blm.gov.*

DATES: The plat described in this notice was filed on April 30, 2015.

ADDRESSES: BLM Colorado State Office, Cadastral Survey, 2850 Youngfield Street, Lakewood, CO 80215–7093.

FOR FURTHER INFORMATION CONTACT: Randy Bloom, Chief Cadastral Surveyor for Colorado, (303) 239–3856. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The supplemental plat of sections 21, 22, 27, and 28 in Township 42 North, Range 9 West, New Mexico Meridian, Colorado, was accepted on April 29, 2015, and filed on April 30, 2015.

Randy Bloom,

Chief Cadastral Surveyor for Colorado.

[FR Doc. 2015–13092 Filed 5–29–15; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCOF02000.L16100000.DP0000]

Notice of Intent To Prepare the Eastern Colorado Resource Management Plan and an Associated Environmental Impact Statement for the Royal Gorge Field Office, Colorado

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended (FLPMA), the Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO), Cañon City, Colorado, intends to prepare a Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS). By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues. The RMP will replace the existing 1996 Royal Gorge RMP and the 1986 Northeast RMP. The BLM is also soliciting resource information for coal and other resources in the planning area.

DATES: This notice initiates the public scoping process for the RMP with an associated EIS. Comments on issues may be submitted in writing until July 31, 2015. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local media, newspapers and the BLM Web site at: *http://www.blm.gov/co/st/en/fo/rgfo.html.* In order to be included in the Draft EIS, all comments must be received prior to the close of the 60-day scoping period or 15 days after the last public meeting, whichever is later. We will provide additional opportunities for public participation upon publication of the Draft RMP/EIS.

ADDRESSES: You may submit comments on issues and planning criteria related to the RGFO RMP/EIS by any of the following methods:

- Web site: *http://www.blm.gov/co/st/en/fo/rgfo.html.*
- Email: *rgfo_rmp_comments@blm.gov.*
- Fax: 719–269–8599.
- Mail: BLM Royal Gorge Field Office, 3028 E. Main St., Cañon City, CO 81212.

Documents pertinent to this proposal may be examined at the RGFO at the address above.

FOR FURTHER INFORMATION CONTACT: John Smeins, RMP Project Manager; telephone, 719–269–8581; BLM Royal Gorge Field Office (see **ADDRESSES** section); email, *rgfo_rmp_comments@blm.gov.* Contact Mr. Smeins to add your name to our mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

31064 **Federal Register** / Vol. 80, No. 104 / Monday, June 1, 2015 / Notices

SUPPLEMENTARY INFORMATION: This document provides notice that the BLM intends to prepare an RMP with an associated EIS for the RGFO, announces the beginning of the scoping process, and seeks public input on issues and planning criteria. The RMP will be titled ''Eastern Colorado RMP''. The planning area is located in 38 counties in eastern Colorado and encompasses approximately 668,000 surface acres of public land and 6.6 million acres of mineral estate. A Master Leasing Plan for the South Park area will be considered. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, seek nominations for Areas of Critical Environmental Concern (ACEC), and guide the planning process. The following preliminary issues to be analyzed in the planning area were identified by BLM personnel; Federal, State and local agencies; and other stakeholders:

- Identifying authorized and permitted land uses for growing populations and expanding urban interface with consideration for community interests and needs;
- Addressing increasing numbers and types of human activities and uses;
- Managing vegetative and water resources, terrestrial and aquatic habitat, and special management areas (ACEC nominations), while sustaining biological diversity and native species populations;
- Managing minerals, and renewable and nonrenewable energy resources;
- Considering land tenure adjustments, split estate, areas recommended for withdrawal, and utility/energy corridors;
- Managing and protecting cultural, historical, and paleontological resources, and Native American heritage resources; and
- Considering opportunities for appropriate regional mitigation, including identifying priority areas for both conservation and development.

Preliminary planning criteria include:

- Complying with FLPMA, NEPA and other applicable laws and regulations;
- Encouraging public participation and collaboration;
- Consulting with American Indian tribes and strategies for protecting recognized sacred areas, Traditional Cultural Properties, and traditional use areas;
- Establishing collaborative partnerships with cooperating agencies and other interested groups, agencies, and individuals;
- Incorporating the BLM Colorado Standards for Public Land Health;
- Continuing management of Wilderness Study Areas under the Interim Management Policy for Lands under Wilderness Review until Congress acts on a designation or releases lands from consideration;
- Recognizing valid existing land use and ownership rights;
- Including adaptive management criteria to explore alternative ways to meet management objectives in the future;
- Complying with existing plans and policies of adjacent local, State and Federal agencies and local American Indian tribes; and
- Using the best available scientific information and research where practicable for the planning effort.

You may submit comments on issues and planning criteria in writing to the BLM at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the **ADDRESSES** section above. To be most helpful, you should submit comments by the close of the 60-day scoping period or within 15 days after the last public meeting, whichever is later. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

The BLM will evaluate identified issues to be addressed in the plan, and will place them into one of three categories:

1. Issues to be resolved in the plan;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this plan.

The BLM will provide an explanation in the Draft RMP/Draft EIS as to why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM will work collaboratively with interested parties to identify management decisions that are best suited to local, regional, and national needs and concerns.

Parties interested in leasing and development of Federal coal in the planning area should provide coal resource data for their area(s) of interest. Specifically, information is requested on the location, quality and quantity of Federal coal with development potential, and on surface resource values related to the 20 coal mining unsuitability criteria described in 43 CFR part 3461. This information will be used for any necessary updating of coal screening determination (43 CFR 3420.1–4) in the Decision Area and in the environmental analysis for the RMP. Proprietary data marked as confidential may be submitted in response to this call for coal information. Please submit all proprietary information to the address listed above. The BLM will treat submissions marked as ''Confidential'' in accordance with applicable laws and regulations governing the confidentiality of such information.

The BLM is also requesting nominations of areas for ACEC designation. To be considered as a potential ACEC, an area must meet the criteria of relevance and importance as established and defined in 43 CFR 1610.7–2. Nominations must include descriptive materials, detailed maps and evidence supporting the relevance and importance of the resource or area. There are currently nine ACECs within the RGFO boundary designated by the 1996 Royal Gorge RMP: Arkansas Canyonlands, Beaver Creek, Browns Canyon, Cucharas Canyon, Droney Gulch, Garden Park, Grape Creek, Mosquito Pass and Phantom Canyon. All ACEC nominations within the planning area will be evaluated through the RMP process.

The BLM will use NEPA public participation requirements to assist the agency in satisfying the public involvement requirements under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. 470(f), pursuant to 36 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed action will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and Section 106 of the NHPA.

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal interests, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed action that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency.

The BLM will use an interdisciplinary approach to develop the plan to

consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Wildlife; threatened and endangered species; vegetation; riparian and wetlands; soils; invasive and noxious weeds; rangeland management; fire ecology and management; cultural resources and Native American interests; hydrology; geology and minerals; lands and realty; recreation; visual resource management; public safety; law enforcement; and Geographic Information Systems.

Ruth Welch,
BLM Colorado State Director.

Authority: 40 CFR 1501.7, 43 CFR 1610.2

[FR Doc. 2015–13060 Filed 5–29–15; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

National Park Service

[NPS–NER–MAMC–16754; PPNCNACEN0, PPMPSAS1Z.Y00000]

Request for Nominations for the Mary McLeod Bethune Council House National Historic Site Advisory Commission

AGENCY: National Park Service, Interior.

ACTION: Request for nominations.

SUMMARY: The National Park Service, U.S. Department of the Interior, is seeking nominations for the Mary McLeod Bethune Council House National Historic Site Advisory Commission (Commission). The purpose of the Commission is to advise the Secretary of the Interior in the implementation of a general management plan for the Mary McLeod Bethune Council House National Historic Site.

DATES: Written nominations must be postmarked by July 1, 2015.

ADDRESSES: Send nominations to Gopaul Noojibail, Superintendent, National Capital Parks-East, Attention: Vicky Gammon, Chief of Staff, National Capital Parks-East, National Park Service, 1900 Anacostia Drive SW., Washington, DC 20020, telephone (202) 690–5193, or email *vicky_gammon@nps.gov.*

FOR FURTHER INFORMATION CONTACT: Vicky Gammon, Chief of Staff, National Capital Parks-East, National Park Service, 1900 Anacostia Drive SW., Washington, DC 20020, telephone (202) 690–5193, or email *NACE_Superintendent@nps.gov.*

SUPPLEMENTARY INFORMATION: The Mary McLeod Bethune Council House National Historic Site Advisory Commission was authorized on December 11, 1991, by Public Law 102–211 (16 U.S.C. 461 note), for the purpose of advising the Secretary of the Interior in the implementation a general management plan for the Mary McLeod Bethune Council House National Historic Site.

The Commission is composed of 15 members, each of which is appointed by the Secretary for a 4-year term. Nominations are seeking nominations for members representing each of the following categories: three members appointed from recommendations submitted by the National Council of Negro Women, Inc.; two members appointed from recommendations submitted by other national organizations in which Mary McLeod Bethune played a leadership role; two members who shall have professional expertise in the history of African American women; three members who shall have professional expertise in archival management; three members who shall represent the general public; and two members who shall have professional expertise in historic preservation.

Members of the Commission will receive no pay, allowances, or benefits by reason of their service on the Commission. However, while away from their homes or regular places of business in the performance of services for the Commission as approved by the Designated Federal Officer, members will be allowed travel expenses, including per diem in lieu of subsistence, in the same manner as persons employed intermittently in Government service are allowed such expenses under 5 U.S.C. 5703.

Individuals who are federally registered lobbyists are ineligible to serve on FACA and non-FACA boards, committees, or councils in an individual capacity. The term ''individual capacity'' refers to individuals who are appointed to exercise their own individual best judgment on behalf of the government, such as when they are designated Special Government Employees, rather than being appointed to represent a particular interest.

Seeking Nominations For Membership

We are seeking nominations for commission members in all categories. Nominations should include a resume providing an adequate description of the nominee's qualifications, including information that would enable the Department of the Interior to make an informed decision regarding meeting the membership requirements of the Commission and permit the Department to contact a potential member.

Individuals who have already applied for nomination need not reapply unless you would like to update your nomination and/or supporting documentation.

Dated: May 19, 2015.

Alma Ripps,
Chief, Office of Policy.

[FR Doc. 2015–13116 Filed 5–29–15; 8:45 am]

BILLING CODE 4310–EE–P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731–TA–1070B (Second Review)]

Certain Tissue Paper Products From China; Institution of a Five-Year Review

AGENCY: United States International Trade Commission.

ACTION: Notice.

SUMMARY: The Commission hereby gives notice that it has instituted a review pursuant to the Tariff Act of 1930 (''the Act''), as amended, to determine whether revocation of the antidumping duty order on certain tissue paper products (''tissue paper'') from China would be likely to lead to continuation or recurrence of material injury. Pursuant to the Act, interested parties are requested to respond to this notice by submitting the information specified below to the Commission; [1] to be assured of consideration, the deadline for responses is July 1, 2015. Comments on the adequacy of responses may be filed with the Commission by August 13, 2015.

DATES: *Effective Date:* June 1, 2015.

FOR FURTHER INFORMATION CONTACT: Mary Messer (202–205–3193), Office of Investigations, U.S. International Trade Commission, 500 E Street SW., Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the

[1] No response to this request for information is required if a currently valid Office of Management and Budget (OMB) number is not displayed; the OMB number is 3117–0016/USITC No. 15–5–337, expiration date June 30, 2017. Public reporting burden for the request is estimated to average 15 hours per response. Please send comments regarding the accuracy of this burden estimate to the Office of Investigations, U.S. International Trade Commission, 500 E Street SW., Washington, DC 20436.

Bureau of Land Management 3028 East Main Street • Cañon City, Colorado 81212

BLM ROYAL GORGE NEWS

FOR IMMEDIATE RELEASE - May 6, 2015

Contact: Kyle Sullivan, Public Affairs Specialist, 719-269-8553

BLM invites public to share vision for Eastern Colorado RMP

CANON CITY, Colo. – The Bureau of Land Management Royal Gorge Field Office is inviting the public to share their vision for the future of their community and how BLM managed public lands and federal minerals fit into that vision at a series of public meetings in May. These envisioning meetings will help guide the BLM as they develop the Eastern Colorado Resource Management Plan.

"We want the public to helps us determine how their public lands should be managed," said Keith Berger, Royal Gorge Field Office Manager. "Public input helps the BLM develop a lasting framework for land use and resource management decisions."

The BLM will work collaboratively with the public, cooperating agencies, other agencies, and partners to begin identifying the vision for the planning area and key management priorities to be addressed in the upcoming resource management plan revision.

The Envisioning Meetings are scheduled for:

- May 18 Greeley, Greeley Recreation Center 651 10th Ave, 7:00-9:00 pm
- May 19 Golden, Denver Mariott West, 1717 Denver West Blvd, 3:00-5:00 pm
- May 20 Fairplay, Fairplay Community Center, 880 Bogue St, 2:00-4:00 pm
- May 26 Salida, Salida High School, 26 Jones Ave, 7:00-9:00 pm
- May 27 Leadville, National Mining Museum, 117 East 10th St, 5:30-7:30 pm
- June 2 Walsenburg, Huerfano County Community Center, 1038 Russell, 7:00-9:00 pm
- June 3 Cañon City, Washington Elementary School, 606 9th St, 7:00-9:00 pm

The Resource Management Plan revision provides a plan for managing development, conserving land and protecting local communities' character and quality of life. To learn more about the Eastern Colorado RMP, please visit: http://on.doi.gov/1HVULcA.

###

The BLM manages more than 245 million acres of public land, the most of any Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield. In Fiscal Year 2014, the BLM generated $5.2 billion in receipts from public lands.

Bureau of Land Management 3028 East Main Street • Cañon City, Colorado 81212
BLM ROYAL GORGE NEWS

FOR IMMEDIATE RELEASE – June 1, 2015

Contact: Kyle Sullivan, Public Affairs Specialist, 719-269-8553

BLM begins public scoping for Eastern Colorado plan

CANON CITY, Colo. – The Bureau of Land Management Royal Gorge Field Office is seeking public input to help guide its Resource Management Plan Revision for 668,000 acres of BLM lands along Colorado's Front Range. The revision will combine the 1996 Royal Gorge Resource Management Plan and the 1986 Northeast Resource Management Plan, to create the new Eastern Colorado Resource Management Plan. The revision will also include a Master Leasing Plan for South Park.

"It's very important to hear from the public before we begin drafting the plan revision," said BLM Royal Gorge Field Manager Keith Berger. "This scoping period gives the public a great opportunity to become involved early in the process. We want to address public concerns in the revision from the outset, and we want to ensure we have the most complete information."

The BLM will accept public scoping comments through July 31, 2015. The scoping period gives the public the opportunity to identify issues to be addressed in the plan revision. The BLM will closely consider public comments in drafting a range of management alternatives for the planning area.

The public is encouraged to stop by one of seven open house meetings anytime between 5:30 p.m. and 7:30 p.m. to talk to BLM specialists, learn more about the revision and provide comments. An informal presentation will be given at 6:30 p.m. each night. Meetings will be held in:

- June 15 - Golden, Denver Marriot West, 1717 Denver West Blvd
- June 16 – Greeley, Greeley Recreation Center, 651 10th Ave
- June 23 – Salida, Salida High School, 26 Jones Ave
- June 24 – Fairplay, Fairplay Community Center, 880 Bogue St (fairgrounds)
- June 25 – Leadville, National Mining Museum, 117 East 10th St
- June 29 – Cañon City, The Abbey, Benedict Rm, 2951 E Highway 50
- June 30 – Walsenberg, Huerfano County Community Center, 1038 Russell

Attendance at these open houses is not required to submit scoping comments to the BLM. For further information about this plan revision and how to provide scoping comments, visit http://on.doi.gov/1HVULcA, or contact John Smeins, RMP Project Manager, at (719) 269-8581.

Scoping comments may be mailed to BLM ECRMP, 3028 E. Main Street, Cañon City, CO 81212; faxed to 719-269-8599; or e-mailed to ECRMP.Comments@blm.gov. Scoping comments will be most helpful if they are specific and received by BLM before July 31, 2015.

###

Bureau of Land Management 3028 East Main Street • Cañon City, Colorado 81212

BLM ROYAL GORGE NEWS

FOR IMMEDIATE RELEASE – July 6, 2015

Contact: Kyle Sullivan, Public Affairs Specialist, 719-269-8553

BLM to host public scoping meeting in Colorado Springs for Eastern Colorado plan

CANON CITY, Colo. – In response to public feedback, the Bureau of Land Management Royal Gorge Field Office is hosting an additional public scoping meeting in Colorado Springs to solicit comments on the Eastern Colorado Resource Management Plan. The open-house style meeting will be held on July 14 from 4:30-7:30 p.m. at the Westside Community Center, 1628 West Bijou St., Co Springs 80904.

"It's very important to hear from the public before we begin drafting the plan revision," said BLM Royal Gorge Field Manager Keith Berger. "This scoping period gives the public a great opportunity to become involved early in the process and talk with BLM specialists to ask questions about different resources we manage."

The BLM will accept comments through July 31, 2015. The scoping period gives the public the opportunity to identify issues to be addressed in the plan revision. The BLM will closely consider public comments in drafting a range of management alternatives for the planning area.

The public is encouraged to stop by the open house meeting anytime between 4:30 and 7:30 p.m. to talk to BLM specialists, learn more about the revision and provide comments. An informal presentation will be given at 6:15 p.m.

Attendance at these open houses is not required to submit comments to the BLM. For further information about this plan revision and how to provide scoping comments, visit http://on.doi.gov/1HVULcA, or contact John Smeins, RMP Project Manager, at (719) 269-8581.

Comments may be mailed to BLM ECRMP, 3028 E. Main Street, Cañon City, CO 81212; faxed to 719-269-8599; or e-mailed to ECRMP.Comments@blm.gov. Scoping comments will be most helpful if they are specific and received by BLM before July 31, 2015.

###

BLM Eastern Colorado Resource Management Plan/ Environmental Impact Statement

The Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO) has initiated a land use planning process that will cover all BLM-administered lands and federal mineral estate within the RGFO, except the Browns Canyon National Monument. It will include a Master Leasing Plan for South Park. Visit the project website for more information, including project background information, a project newsletter, and information on upcoming public meetings: **www.blm.gov/co/st/en/fo/rgfo.html**

Please note that travel management plans and route designations are not being reevaluated as part of this planning effort. Future travel management planning will be conducted under separate National Environmental Policy Act of 1969 (NEPA) analysis. Similarly, the Arkansas River Management Plan is an independent planning and NEPA effort and is not part of this resource management plan revision.

If you would prefer to have updates sent electronically, please send your full name and email address to ecrmp.comments@blm.gov.

US Department of the Interior
Bureau of Land Management
Royal Gorge Field Office
c/o EMPSi *
3775 Iris Avenue, Suite 1A
Boulder, CO 80301

**Acting as contracted agent for the Bureau of Land Management*

FIRST-CLASS MAIL
U.S. POSTAGE & FEES PAID
BUREAU OF LAND MANAGEMENT
PERMIT NO. G-76

Introduction from the Field Manager

The Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO) has initiated a land use planning process that will cover all BLM-administered lands and federal mineral estate within the RGFO, except the Browns Canyon National Monument, which will undergo its own planning effort. The BLM currently manages public lands through two resource management plans (RMPs) and associated amendments. These RMPs are the Royal Gorge RMP (1996), as amended by the South Park Land Tenure Adjustment Plan (2005) and four travel management plan amendments, and the Northeast RMP (1986), as amended in 1991 by the Oil and Gas Amendment. The BLM's current management decisions are based on the Records of Decision for each of these plans. The new RMP, which will be called the Eastern Colorado RMP, will combine both of the original planning areas into one cohesive plan.

This is the first in a series of newsletters designed to keep you informed on the progress of the Eastern Colorado RMP/environmental impact statement (EIS) and how you can participate. Inside, you can find information about the planning area, what an RMP involves, preliminary planning issues and criteria, and how you can participate in this first phase of the process. We appreciate your help in this effort, and we look forward to your continued interest and participation in this project.

Keith Berger, RGFO Field Manager

Eastern Colorado RMP Planning Area

The planning area is the RGFO boundary, including all lands, regardless of land ownership, and encompasses approximately 35,660,000 acres of federal, state, and private lands in 38 eastern Colorado counties. The BLM's decision area for this planning effort includes all BLM-administered lands (approximately 668,000 acres) and federal mineral estate (approximately 3,895,000 acres of federal minerals under other federal land and 2,679,000 acres of federal minerals under state, municipal, and private lands) within the planning area, except Browns Canyon National Monument. The decision area does not include other federal, state, municipal, or private lands. The planning area covers a large percentage of eastern Colorado; however, BLM surface management of the area is relatively small, being confined mainly to seven counties in south central Colorado. The remaining BLM-administered surface lands are small isolated tracts scattered over the rest of eastern Colorado. Surface lands within the planning area administered by other federal agencies, such as the United States (US) Forest Service, Department of Defense, US Bureau of Reclamation, US Fish and Wildlife Service, National Park Service; and by state agencies, such as the Colorado State Land Board; are not the subject of this planning effort. In addition, planning decisions and descriptions in the RMP do not apply to private lands, with the exception of federal minerals that lie beneath private lands (known as split estate). See the last page of the newsletter for a map of the Eastern Colorado RMP planning area surface and subsurface estate.

What is a Resource Management Plan?

An RMP, similar to a county master plan, is a land use plan that describes broad multiple-use guidance for managing lands and federal mineral estate administered by the BLM. The Federal Land Policy and Management Act directs the BLM to develop such land use plans and to provide for appropriate uses of public lands. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions.

The BLM land use (or RMP) planning process, explained in 43 Code of Federal Regulations (CFR) 1600 and the BLM Land Use Planning Handbook and Manual (H-1601-1; BLM Manual 1601), falls within the framework of the National Environmental Policy Act of 1969 (NEPA) environmental analysis and decision-making process described in the Council on Environmental Quality regulations of 40 CFR 1500-1508, the Department of the Interior NEPA Manual (516 DM 17), and the BLM NEPA Handbook (H-1790-1).

How Can You Participate?

Public involvement is an integral part of preparing the Eastern Colorado RMP/EIS. The envisioning and public scoping periods give the public and other interested agencies and organizations the opportunity to provide comments on issues to be addressed and methods to be used in the RMP revision before the BLM begins drafting it.

The public is formally invited and encouraged to participate in the RMP revision process. Some ways you can participate are:

◊ Attending one or more of the *envisioning meetings* (see this and last page) to help develop the vision for, and key management priorities to be addressed in, the RMP revision

◊ Attending one or more of the *scoping open houses* (see this and last page) to learn about the project and planning process and to meet BLM representatives

◊ Reviewing the progress of the RMP revision online at the Eastern Colorado RMP website, www.blm.gov/co/st/en/fo/rgfo.html; the website will be updated with information, documents, and announcements throughout RMP/EIS preparation

◊ Mailing, faxing, or emailing a comment to the RMP address (see next page)

◊ Join or remain on the Eastern Colorado RMP mailing list by:

- E-mailing us at ecrmp.comments@blm.gov
- Mailing a letter to our office (see next page)
- Contacting John Smeins at (719) 269-8581

Envisioning

The BLM will work collaboratively with the public, cooperating agencies, partners, and other stakeholders to establish a vision for, the Eastern Colorado decision area. This vision will serve as the foundation for the RMP revision and help refine the purpose of and need for the RMP revision and preliminary planning criteria (see next page). The vision will be developed by first identifying priorities for the planning area at multiple scales, including national, regional, local, and community-based priorities. Priorities may focus on a single resource or a broad goal that involves multiple resources.

The BLM will host seven public envisioning meetings to discuss key management priorities for the RMP revision. Meetings will be facilitated, teach you about the planning process, and include targeted questions to inspire brainstorming. Attendees will strategize on how to meet competing needs and then share ideas with the BLM. We encourage you to attend and give input about your vision for public lands.

Scoping

The official scoping period will begin with publication of the Notice of Intent (NOI) in the Federal Register, which is anticipated on June 1, 2015, and will continue for 60 days (until July 31, 2015). During the scoping period, the BLM will host seven scoping open houses in Colorado where you can learn about the project and planning process, talk with BLM representatives, and provide written comments identifying planning issues. The BLM welcomes input at any time during the RMP process. However, comments received during the 60-day scoping period will be reviewed and analyzed to further refine the planning issues.

Next Steps

This preliminary schedule outlines major steps in the EIS process and what happens at each step.

Envisioning, Public Scoping, and Resource Data Collection ***We are here!***	Alternative Development and Draft RMP/EIS Preparation	Draft RMP/EIS Publication	Proposed RMP/Final EIS Preparation and Publication	Record of Decision and Approved RMP Preparation and Publication
Spring – Summer 2015	***Fall 2015 – Winter 2016***	***Winter 2016–2017***	***Winter 2017–2018***	***Winter 2018–2019***
Host envisioning meetings Host public scoping meetings Conduct special studies Gather public comments on scope over 60-day period Publish scoping report summarizing public comments	Use public comments in creating alternatives Analyze impacts of alternatives	Publish draft EIS Host public meetings Accept public comments on draft EIS during 90-day comment period	Review and incorporate public comments on draft EIS Publish final EIS Hold 30-day public review and protest period	Write and publish record of decision

Preliminary Planning Issues

Planning issues are conflicts or concerns over a resource management topic that is well defined and entails alternative actions or decisions. The BLM requests your comments on these or other issues on BLM-administered lands within the Eastern Colorado RMP planning area. Please note that travel management plans and route designations are not being reevaluated as part of this planning effort. Future travel management planning will be conducted under separate NEPA analysis. Similarly, the Arkansas River Management Plan and the Browns Canyon National Monument plans are independent planning and NEPA efforts and are not part of this RMP revision. Preliminary planning issues are:

- Managing public lands and resources, including authorized and permitted land uses, for a growing population and expanding urban interface, with consideration for community values and needs
- Addressing increasing numbers and types of human activities and uses
- Managing vegetative and water resources, terrestrial and aquatic habitat, and special management areas (areas of critical environmental concern nominations), while sustaining biological diversity and native species populations
- Managing mineral, renewable, and nonrenewable energy resources
- Considering land tenure adjustments, split estate, withdrawals, and utility/energy corridors

Contact us to Get on the Mailing List!

To request addition to or removal from the list or to update your address, contact us by one of the methods below. You can also use these methods to submit a scoping comment.

Email: ecrmp.comments@blm.gov

Postal Mail: John Smeins
Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

Phone: (719) 269-8581

Before providing your phone number, email address, or other personal identifying information, you should be aware that your information may be made publicly available at any time. While you can request that your personal identifying information be withheld from public review, we cannot guarantee that we will be able to do so.

Preliminary Planning Criteria

Planning criteria guide development of the Eastern Colorado RMP/EIS by helping define the decision space. They are generally derived from applicable laws, BLM Director and Colorado State Director guidance, and the results of public and governmental participation (43 CFR 1610.4-2). The BLM developed preliminary planning criteria to set the sideboards for focused decision-making and analysis in the RMP/EIS. Planning criteria will evolve throughout the planning process as public comment is received. Preliminary planning criteria are:

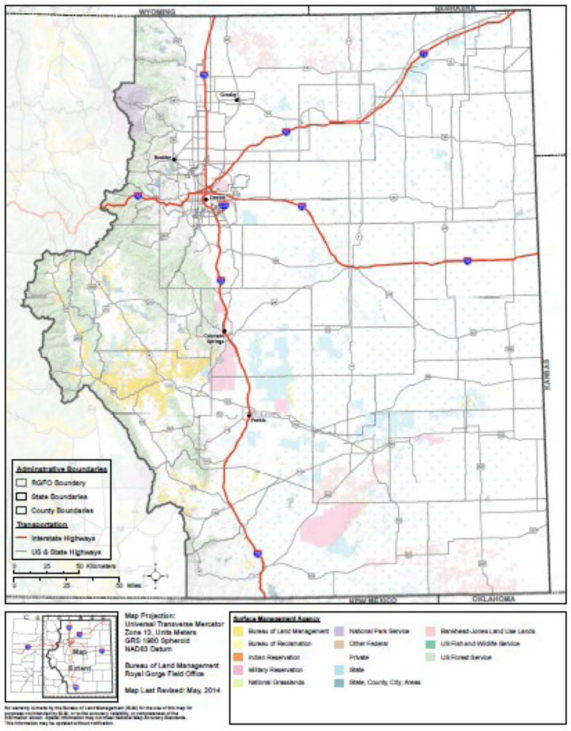
- The BLM will recognize in the RMP/EIS the special importance of public lands to people who live in communities surrounded by public lands and the importance of public lands to the nation as a whole.
- The BLM will make every effort to encourage public participation throughout the RMP/EIS process.
- Environmental protection and commodity extraction are both desirable and necessary objectives of sound land management practices and are not to be considered mutually exclusive priorities.
- Broad-based public participation will be an integral part of the RMP/EIS process. Decisions in the plan will strive to be compatible with the existing plans and policies of adjacent local, state, federal, and tribal agencies as long as the decisions are consistent with the purposes, policies, and programs of federal law and regulations applicable to public lands.
- The BLM will strive to minimize potential adverse impacts.
- The BLM will recognize and make decisions following all existing laws and regulations
- The BLM will facilitate oil and gas development and production and provide options for flexibility to the oil and gas industry for environmentally sound exploration, development, and operations.
- A Master Leasing Plan for South Park will be considered.
- The RMP/EIS will consider management of lands bordering the decision area and will strive to harmonize management of BLM-managed lands in the decision area with adjacent lands outside the decision area.

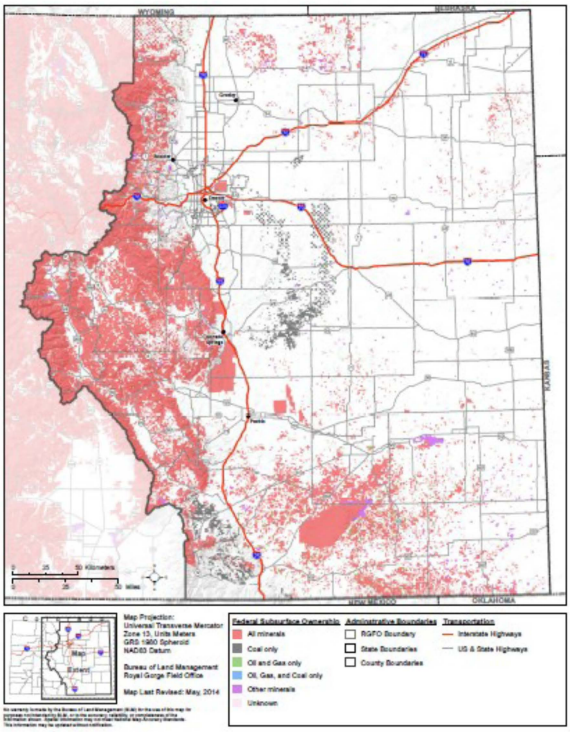
BLM's Multiple-Use Mission

The BLM's multiple-use mission mandates managing public land resources for a variety of uses, such as energy development, livestock grazing, recreation, and timber harvest, while protecting a wide array of natural, cultural, and historical resources.

Click on each map to view the full-sized PDF files.

Eastern Colorado RMP Planning Area Surface Estate (left map) and Subsurface Estate (right map)





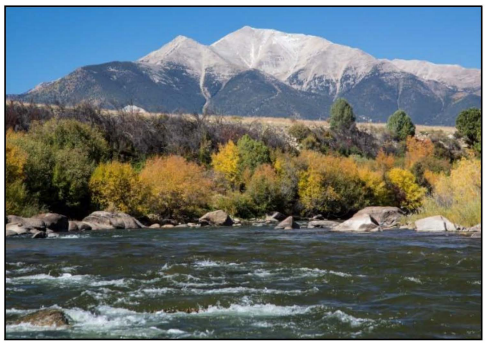
Mark Your Calendar! *Public Involvement Opportunities*

Location (Colorado)	Envisioning Meeting	Scoping Open House
Greeley Recreation Center, 651 10th Avenue, **Greeley**	May 18 7:00–9:00pm	June 16 5:30–7:30pm
Denver Marriott West, 1717 Denver West Boulevard, **Golden**	May 19 3:00–5:00pm	June 15 5:30–7:30pm
Fairplay Community Center, 880 Bogue Street (fairgrounds), **Fairplay**	May 20 2:00–4:00pm	June 24 5:30–7:30pm
Salida High School, 26 Jones Avenue, **Salida**	May 26 7:00–9:00pm	June 23 5:30–7:30pm
National Mining Museum, 117 East 10th Street, **Leadville**	May 27 5:30–7:30pm	June 25 5:30–7:30pm
Huerfano County Community Center, 1038 Russell, **Walsenburg**	June 2 7:00–9:00pm	June 30 5:30–7:30pm
June 3: Washington Elementary School, 606 N 9th Street, **Cañon City** June 29: The Abbey, Benedict Rm, 2951 E Hwy 50 (E. Frontage Rd), Cañon City	June 3 7:00–9:00pm	June 29 5:30–7:30pm

Project Overview

BLM

History



The United States Department of the Interior, Bureau of Land Management (BLM), Royal Gorge Field Office (RGFO) has initiated a land use planning process that will cover all BLM-administered lands and federal mineral estate in the RGFO. The BLM currently manages public lands through two resource management plans (RMPs) and associated amendments: the Northeast RMP (1986), as amended in 1991 by the Oil and Gas Amendment, and the Royal Gorge RMP (1996), as amended by the South Park Land Tenure Adjustment Plan (2005) and four travel management plans. The BLM's current management decisions are based on the records of decision for each of these respective plans. The new RMP, called the Eastern Colorado RMP, will combine both of the original planning areas into one cohesive plan. The new Browns Canyon National Monument will not be part of this planning effort and will undergo its own planning process.

The planning area covers a large percentage of eastern Colorado; however, BLM surface management of the area is relatively small and confined mainly to seven counties in south-central Colorado. The remaining BLM-administered lands are small isolated tracts scattered throughout eastern Colorado. Sub-surface federal mineral estate managed by the BLM is scattered throughout the planning area and includes large blocks of land.

Why Is a New RMP Needed?

Since the current RMPs were approved, new technology and changes in population size, commodities, and energy production have affected, or have the potential to affect, resources within the planning area. Changes in current management direction provided by the existing RMPs are needed to address new challenges and opportunities. For some resources, current management direction is adequate, and few changes are anticipated. For other resources, significant changes have occurred that require new or additional management direction. The new RMP should fill these gaps and formulate new guidance, mitigation strategies, and decisions. An accompanying environmental impact statement (EIS) will provide a detailed analysis of anticipated impacts from management decisions in the RMP.

Preliminary Planning Criteria

BLM

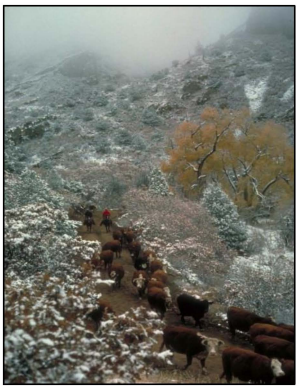
Planning criteria guide development of the Eastern Colorado RMP/EIS by helping to define the decision space. The criteria are generally derived from applicable laws, BLM Director and Colorado State Director guidance, and the results of public and governmental participation (43 CFR 1610.4-2). The BLM developed preliminary planning criteria to set the sideboards for focused decision-making and analysis in the RMP/EIS. The preliminary planning criteria will be further refined based on feedback received during scoping and other public input. These preliminary planning criteria are:

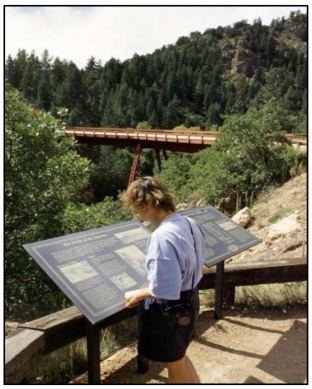
- The BLM will recognize the special importance of public lands to people who live in communities surrounded by public lands and the importance of public lands to the nation as a whole.
- The BLM will make every effort to encourage public participation throughout the RMP/EIS process.
- Environmental protection and commodity extraction are both desirable and necessary objectives of sound land management practices and are not to be considered mutually exclusive priorities.
- Broad-based public participation will be an integral part of the RMP/EIS process. Decisions in the RMP will strive to be compatible with the existing plans and policies of adjacent local, state, federal, and tribal agencies as long as the decisions are consistent with the purposes, policies, and programs of federal law and regulations applicable to public lands.
- The BLM will strive to minimize potential adverse impacts at the landscape scale and address those issues that are priorities.
- The BLM will recognize and make decisions following all existing laws and regulations.
- The BLM will facilitate oil and gas development and production to provide the oil and gas industry with flexible options for environmentally sound exploration, development, and operations.
- The BLM will consider development of a Master Leasing Plan for South Park.
- The RMP/EIS will consider management of lands bordering the decision area and will strive to harmonize management of BLM-administered and adjacent lands.

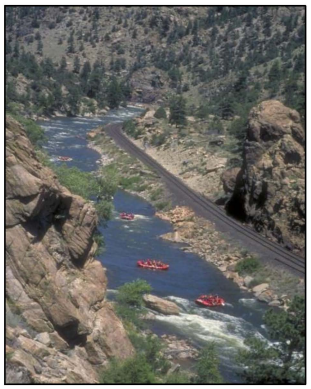
Tell Us What You Think!

Are there additional planning criteria the BLM should use to set the sideboards for focused decision-making and analysis in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**







Public Scoping for the Eastern Colorado RMP/EIS

BLM

Common BLM Acronyms and Abbreviations

	Full Phrase
ACEC	Area of Critical Environmental Concern
AMS	Analysis of the Management Situation
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
ECRMP	Eastern Colorado Resource Management Plan
EIS	environmental impact statement
ERMA	extensive recreation management area
LWC	Lands with Wilderness Characteristics
MLP	master leasing plan
NEPA	National Environmental Policy Act of 1969
NOA	Notice of Availability
NOI	Notice of Intent
OHV	off-highway vehicle
RGFO	Royal Gorge Field Office
RMP	resource management plan
ROD	Record of Decision
ROW	right-of-way
SRMA	special recreation management area
TMP	Travel Management Plan
US	United States
VRI	Visual Resource Inventory
VRM	Visual Resource Management
WSA	Wilderness Study Area
WSR	Wild and Scenic River

BLM ROYAL GORGE FIELD OFFICE

Providing Comments During Public Scoping

John Smeins, Project Lead
3028 East Main Street
Cañon City, CO 81212
Office hours are 8:00 am to 4:30 pm
Phone: (719) 269-8581
FAX: 719-269-8599

The United States Department of the Interior, Bureau of Land Management (BLM) Royal Gorge Field Office (RGFO) is seeking public input as it initiates a Resource Management Plan (RMP) Revision and Environmental Impact Statement (EIS) for modifying the 1996 and 1986 RMPs, as amended. The Eastern Colorado RMP/EIS will provide detailed information about the current state of resources on BLM-administered lands within the planning area and establish a plan for managing those resources for the next 20-plus years under the BLM's multiple use mandate.

PROVIDING EFFECTIVE COMMENTS

This is an opportunity for you to be involved in the BLM's decision-making process and to offer your thoughts on alternative ways for the agency to accomplish what it is proposing. Many public land users, organizations, and individuals want to provide comments to help in the Eastern Colorado RMP planning effort. Comments that provide relevant and new information with sufficient detail are most useful and are referred to as substantive comments. The BLM reviews all comments and identifies the topics that are substantive for consideration in the final published scoping report. Try not to provide comments that offer opinion only.

Substantive comments during scoping do one or more of the following:

- Raise issues the BLM has not considered or reinforce issues the BLM has already identified
- Identify additional planning criteria
- Present information that can be used when developing alternatives
- Present reasonable alternatives
- Present information that can be used when the BLM considers impacts of alternatives
- Raise concerns, with reasoning, regarding public land resources within the planning area
- Raise concerns, with reasoning, regarding uses of BLM-administered lands within the planning area
- Recommend specific changes to the landscape or management actions
- Question, with reasonable basis, the accuracy of information in an existing report

Comments that are not substantive include:

- Comments in favor of or against an action without any reasoning (such as "I don't like _____" without providing any rationale)
- Comments that only agree or disagree with BLM policy
- Comments without justification or supporting data (such as "allow more grazing")
- Comments that do not pertain to the planning area (such as "the government should eliminate all dams throughout the west")
- Comments that take the form of vague, open-ended questions

BLM

Providing Comments During

Public Scoping

Comments can be faxed to:
719-269-8599

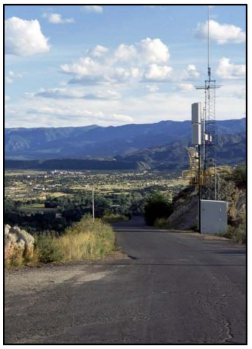
Comments can also be mailed to:
John Smeins
Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

Email address for public comments:
ECRMP.comments@blm.gov

Air Quality

BLM

Background Information



The overall health of any region's air quality is determined by monitoring for certain pollutants and gauging whether or not the measured concentrations exceed applicable standard limits. Air quality within the Royal Gorge Field Office is governed though federal, state, and local regulations and implementation plans. Areas where air quality concentrations are below the applicable standard limits are said to have attained the National Ambient Air Quality Standards, whereas areas that currently violate a standard or have violated one in the past are designated as nonattainment or maintenance areas.

One of the primary purposes for the Eastern Colorado RMP/EIS is to take a hard look at the impacts of BLM management actions on air quality.

Potential Decisions:

Air resources planning as part of the Eastern Colorado RMP/EIS may:

- Identify site-specific emission control strategies, processes, and actions to achieve desired air quality regulations, as required by the Clean Air Act, Executive Order 12088, and tribal, federal, or state implementation plans
- Identify site-specific emission-control strategies, processes, and actions to achieve desired air quality conditions from direct or authorized emission-generating activities

Planning Issues:

- What management actions within BLM jurisdiction are necessary to maintain and/or enhance air quality resources, including maintaining and/or improving air quality within state and federal air quality standards and addressing actions impacting Class I airsheds?
- What management actions and mitigation can the BLM use to help reduce greenhouse gas emissions?
- How can the BLM manage proposed activities in conformance with restrictions in place for nonattainment and maintenance areas?

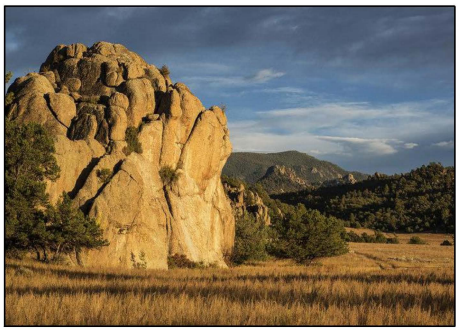
Public Scoping for the Eastern Colorado RMP/EIS

Cultural Resources and Tribal Concerns

Background Information

The BLM identifies cultural resources by performing inventory activities, including fieldwork, archival research and remote sensing, using GIS resources. After a cultural resource is identified, the BLM evaluates its integrity and its suitability for listing on the National Register of Historic Places, and whether it might be important to Native American or other traditional communities. Cultural resource integrity might be affected by physical destruction, damage, neglect, alteration, isolation, transfer, sale, or lease of a resource, or alteration of the resource setting. Loss of cultural resource integrity affects many aspects of a site, including the completeness and accuracy of the scientific information it contains, its aesthetic, historic, or interpretive value, and its importance for maintaining social and cultural traditions.

The Royal Gorge Field Office (RGFO) manages cultural resources that range from 50 to 12,000 years in age. Populations of both aboriginal and European ancestry occupied the eastern part of Colorado at different times in our history and left a diverse array of sites on BLM-administered land. Many of the sites possess rich cultural information and have the potential to greatly enhance our understanding of the past.



Two branches of a National Historic Trail (the Santa Fe Trail), pass through southeastern Colorado, and segments are present on BLM-administered land. The BLM manages the segments as historic properties with special emphasis on locating physical remains of the trail, thus refining the known corridor.

No Native American groups reside within the jurisdiction of the RGFO; however, 17 tribes have historic ties to the area. As part of both its Section 106 and Section 110 responsibilities under the National Historic Presrvation Act, the BLM manages sacred sites, possible traditional use areas and potential traditional cultural properties with the same high level of care that it affords all historic properties. In addition, the BLM evaluates every site for its possible importance to Native Americans, and if a need is identified through consultation, employs additional measures that emphasize security, protection, and access for interested tribes.

Potential Decisions:

Planning to address cultural resources and tribal concerns as part of the Eastern Colorado RMP/EIS might:

- Identify special cultural resource restrictions that may affect the location, timing, or method of development or use of other resources in the planning area
- Identify site-specific use restrictions for cultural resources currently being actively managed
- Identify area-wide criteria for recognizing potential cultural resource conflicts, such as geographic characteristics of sacred sites, historic properties, or cultural landscapes (e.g., springs, ridges, peaks, caves, and rock shelters)
- Identify measures to proactively manage, protect, and use cultural resources, including traditional cultural properties

Planning Issues:

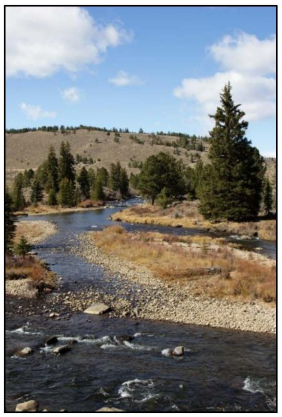
- How will cultural resources be managed?
- How will tribal concerns be addressed?

Fire and Fuels Management

BLM

Background Information

The Federal Wildland Fire Management Policy was developed by the secretaries of the departments of Interior and Agriculture in 1995 in response to the dramatic increases in the frequency, size, and catastrophic nature of wildfires in the United States. This policy requires land managers to have an approved Fire Management Plan for BLM-administered lands with burnable vegetation. The Fire Management Plan provides a foundation for integrating fire management with all other BLM resource management programs in the Royal Gorge Field Office (RGFO). The Fire Management Plan is a tool for planning and achieving resource management objectives on BLM-administered land as defined in the governing RMP. The first Fire Management Plan was developed in 2001 for the Front Range Interagency Fire Management Unit. Since then, several revisions, changes, and updates have been made to the Fire Management Plan to stay current and consistent with new guidance and policies.



Fuels within the RGFO planning area include grasslands, shrublands, pinyon-juniper, ponderosa pine, mixed conifer, and aspen. Wildland urban interface areas are areas in which undeveloped lands meet or intermix with human development. These developments can include communities and subdivisions, as well as isolated structures and infrastructure. Wildland urban interface areas have drastically increased over the last two decades and have become a major part of planning efforts in the BLM's fire and fuels programs. Prescribed fire and mechanical treatments are primary components of the hazardous fuels reduction program in the planning area.

Potential Decisions:

Fire and fuels management planning as part of the Eastern Colorado RMP/EIS may:

- Identify landscape-level fire management goals and objectives
- Identify allowable uses and management actions to achieve the fire management goals and objectives, and support the goals and objectives for vegetation, wildlife, and other resources
- Identify the geographic areas that are/are not suitable for management of natural ignitions to meet specific land management objectives (e.g., fire for resource benefit)

Planning Issues:

- How can fire and fuels management be implemented to return the landscape to more sustainable and resilient condition?
- With the uncertainty of future funding, how can the BLM maintain flexibility within the fire and fuels program so that resources can be shifted to emphasize areas that are being funded while maintaining the long-term capability to perform all aspects of the fire management job?
- What trends and likely future conditions are important to consider when planning prescribed fire and mechanical treatments in the planning area?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional fire and fuels management topics that should be covered in the EIS?
2. Under what conditions should fire suppression or fuel reduction activities occur?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Fluid Minerals

BLM

Background Information

Fluid Minerals include oil and gas, tar sands, and geothermal resources; however the RGFO does not have any areas with tar sands potential identified. Fluid minerals are typically offered via leases and lease sales. The RGFO is tasked with balancing the development of fluid minerals with all other resource areas as part of the BLM's multiple use mandate. The Mineral Leasing Act of 1920 as amended and the Act of May 21, 1930 govern the BLM's management of fluid mineral development. The BLM typically balances energy development with protection of other resources by applying stipulations at the leasing stage where high oil and gas potential areas overlap with other resources with high values. Examples of these resources include wildlife, sensitive soils, cultural resources, and recreation areas. However, the BLM is required by the Energy Policy Act of 2005 to use the least restrictive stipulations that effectively accomplish the resource objectives. Decisions to prohibit or restrict fluid mineral activities through closures and lease stipulations in this RMP will not affect existing leases. The BLM also applies conditions of approval to permits based on site-specific analysis to protect other resources. Conditions of approval are applied in accordance with lease terms and lessee rights.

The RGFO has sold one geothermal lease in Chaffee County and will be identifying additional areas of potential geothermal activity during this planning process. Oil and gas development is actively occurring in the RGFO. From 2007 to 2011, 2,056 oil and gas wells were drilled within the RGFO planning area, and in that timeframe, 1,810 were completed. Of those completed, 1,611 wells were completed to produce oil and or gas, and approximately 25 were used as gas storage or as observation wells. Many more oil and gas wells have been drilled and completed in the RGFO over the past four years. The majority of these new wells are in the Denver/Julesberg Basin within Weld County. Most of the oil and gas wells currently being drilled are horizontal wells in the Niobrara and Codell formations, primarily targeting oil and fluid rich gas. The majority of oil and gas wells in the RGFO are on surface lands not administered by the BLM.

Potential Decisions:

Fluid mineral management as part of the Eastern Colorado RMP/EIS may:

- Identify areas open to leasing subject to standard lease terms and conditions, open to leasing subject to moderate constraints such as season and controlled surface use stipulations, and areas open to leasing subject to major constraints such as no surface occupancy stipulations
- Identify areas closed to leasing
- Consider which, if any, additional mitigation measures or conditions of approval are necessary for protection of the environment and other resource values in accordance with the terms and conditions of leases

Planning Issues:

- What areas should be closed to leasing due to resource concerns that cannot be addressed with lease stipulations and conditions of approval allowed in the standard lease terms?
- How should the BLM manage water quality concerns related to oil and gas development?
- How should the BLM address visual resources and unique landscapes in relation to oil and gas development on BLM-administered surface land?
- What requirements or protections should be designed to address air quality concerns?
- What updated or new best management practices and mitigation measures are needed for fluid mineral decisions?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional fluid mineral topics that should be covered in the EIS?
2. Are there BLM-administered lands in the planning area that should be closed to fluid mineral leasing or subject to moderate or major constraints due to resource concerns?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Forestry

BLM

Background Information

The BLM administers forested lands in Colorado. The majority of forested acres in the Royal Gorge Field Office are considered woodlands dominated by pinyon, juniper, and oak. The remaining forested acres consist of traditional commercial tree species such as ponderosa pine, lodgepole pine, spruce, and Douglas fir. Forest lands in Colorado have low productivity rates due to harsh conditions such as short growing season or young soils in geological times. Some of the wood products harvested include sawtimber, firewood, Christmas trees, post and poles, transplants, pinyon nuts, craftwood, house logs, and biomass. The primary emphasis of the BLM's forests and woodlands program is offering a scientifically sound and environmentally responsible level of timber sales, as well as conducting forest and woodland health restoration treatments to reduce the risk of catastrophic wildfire and bark beetle epidemics while improving forest health.

The Mountain Pine Beetle, spruce beetle, and other variations of bark beetles are at epidemic levels throughout the western United States and have impacted more than 4 million acres in Colorado and southeastern Wyoming since the first signs of outbreak in 1996. The epidemic results in large stands of dead trees. Mitigation of outbreaks in these areas is critical because dead trees can add to wildfire intensity, severity and control efforts. Additionally, dead and dying trees can impact watershed resources, wildlife habitat, range infrastructure, recreation opportunities, human health and safety, and basic services such as travel, electricity, and water.

Potential Decisions:

Forestry management planning as part of the Eastern Colorado RMP/EIS may:

- Identify characteristics to describe healthy forest conditions for forest and woodland types in the planning area
- Identify a suite of possible management actions and associated best management practices that can be applied to forested areas to meet desired outcomes
- Identify areas that are available and have the capacity for planned, sustained-yield timber harvest or special forest product harvest
- Identify the number of forested acres at moderate to high risk of bark beetle attack and management actions specific for these areas
- Identify areas as moderate to high risk from catastrophic wildfire
- Identify areas of relative ecological importance to guide lands uses and management, including:
    - Areas of deforestation from recent large fires and changes in forest composition
    - Areas with loss of quaking aspen due to lack of disturbance, conifer encroachment, drought, and the number of ungulates on the landscape
    - Areas where the average number of trees is unsustainable at current levels
    - Areas lacking forest age class diversity

Planning Issues:

- How should the BLM manage forest health and diversity across the landscape?
- How should the BLM address demands for commercial/economic and personal use of forest products?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional forestry topics that should be covered in the EIS?
2. Are there BLM-administered lands in the planning area that require increased management actions to maintain or enhance forest diversity or improve forest health?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Lands and Realty

BLM

Background Information

The BLM lands and realty program includes several types of land use authorizations. Rights-of-way (ROWs) may be issued or granted for roads, pipelines, transmission lines, renewable and nonrenewable energy facilities, and such other systems or facilities that are in the public interest on BLM-administered public lands. Public land may be leased or conveyed under the Recreation and Public Purposes Act to States or their political subdivisions and to nonprofit corporations and associations for recreation and public purposes. The BLM may undertake land tenure adjustment actions through acquisition, exchange, or disposal (sale) of land when it is the public interest, provides resource protection, improves land management through consolidation, or provides access to public land or waters.

Future oil, gas, and geothermal development in the planning area is expected to result in the need for additional ROWs for roads, power lines, and pipelines to support new infrastructure. Rapidly changing telecommunications technology may result in expansion of telephone and fiber optic systems and wireless communication sites in the planning area to provide infrastructure for coverage in many areas previously inaccessible to these types of technology.

Potential Decisions:

Lands and realty management as part of the Eastern Colorado RMP/EIS may:

- Designate utility corridors across the planning area that will coincide with corridors in adjoining BLM field offices
- Identify areas where ROW development may be prohibited or restricted in order to protect resources
- Identify lands that are appropriate for disposal through sale or exchange.
- Address and incorporate recommended criteria for land tenure within the planning area

Planning Issues:

- How should the BLM manage lands for retention, disposal, or acquisition in order to meet resource goals and objectives?
- How should ROWs be managed in the planning area in order to provide for infrastructure and protect resources?
- What BLM-administered lands in the planning area are appropriate for disposal?
- How should the BLM address the land tenure of new and existing Recreation and Public Purposes Act leases?
- How should the BLM address the need for ROWs and easements in relation to resource protection and use and to improve the efficiencies of management?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

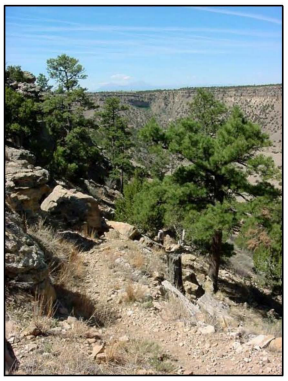
1. Are there additional lands and realty topics that should be covered in the RMP/EIS?
2. Are there BLM-administered lands in the planning area that should be disposed of or non-BLM-administered lands that should be acquired?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Lands with Wilderness Characteristics

BLM

Managing the wilderness resource is part of the BLM's multiple use mission. Consistent with the Federal Land Policy and Management Act of 1976 (FLPMA) and other applicable authorities, the BLM will consider the wilderness characteristics of public lands when undertaking land use planning. The BLM will use the land use planning process to determine how to manage lands with wilderness characteristics as part of the BLM's multiple-use mandate.



In 2013, the BLM completed a lands inventory to determine the presence or absence of lands with wilderness characteristics. Typically the inventory process documents existing conditions using available information (e.g., existing maps, photos, records related to range projects, monitoring data) with field checks of the information as necessary. The BLM may also evaluate new information regarding wilderness characteristics that is submitted by the public. In order for an area to qualify as a land with wilderness characteristics, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation.

The initial 2013 inventory identified 40 parcels comprising 77,756 acres that met the criteria for wilderness characteristics. Additional information has also been submitted to the BLM that has yet to be evaluated.

Potential Decisions:

Planning for lands with wilderness characteristics as part of the Eastern Colorado RMP/EIS may include:

- Identify lands where other uses are emphasized as a priority over protecting wilderness characteristics
- Identify lands where other uses are emphasized while applying management restrictions to reduce impacts to wilderness characteristics
- Identify lands where protection of wilderness characteristics is a priority over multiple uses and management restrictions are applied

Planning Issues:

- How should the BLM manage lands found to have wilderness characteristics?
- What management restrictions should be put in place to protect this resource if that is the desired management direction?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. How should lands with wilderness characteristics be managed in the future?
2. What management restrictions should/should not be applied to protect lands with wilderness characteristics?
3. Do you have additional information that would assist in the inventory of lands with wilderness characteristics?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Master Leasing Plans

BLM

In 2010, the BLM introduced leasing reform to manage oil and gas development on public lands. Leasing reform allows the BLM to conduct a more in-depth review of areas that are or may be opened to leasing at the planning level through the development of master leasing plans (MLPs). The purpose of an MLP is to plan for oil and gas development at the land-use plan level in a defined area containing a high level of potential resource concerns in an orderly, effective, timely, and environmentally responsible manner. MLPs create more certainty and predictability when leasing for oil and gas resources while protecting multiple-use values and providing consideration of natural and cultural resources. MLPs may apply to the leasing of federal minerals under BLM-administered surface estate and under state-owned or privately-owned surface (i.e., split estate). The two main components of an MLP are:

- Develop goals for maintaining or improving the condition of natural resource values in the area
- Identify resource protection measures and best management practices that may be adopted as lease stipulations in an RMP

The following are examples of planning decisions for the BLM to consider through the MLP process with appropriate supporting NEPA analysis:

- Phased leasing
- Phased development
- Requirements to reduce or capture emissions
- Multiple wells on a single pad
- Additional mitigation measures

The MLP process is conducted through the NEPA process using an interdisciplinary team that coordinates and/or consults with the public and other stakeholders that may be affected by the BLM's MLP decisions. The BLM has identified the South Park area for an MLP as part of this RMP revision. Park County and the Coalition for Upper South Platte have begun a separate preliminary effort to raise public awareness about the South Park MLP. The BLM will ultimately make the decisions related to the South Park MLP but will continue to engage the public and other stakeholders throughout the MLP process.

Recreation

BLM

Background Information

BLM-administered lands within the planning area support a variety of recreation activities. The fragmented public land ownership in the Royal Gorge Field Office (RGFO) planning area results in wide discrepancies in levels of use and activity. BLM-administered lands that are surrounded by private lands or have limited public access receive relatively low levels of use. In contrast, BLM-administered lands near communities experience much higher levels of use. Increasing interest in and demand for recreation-based economic development and associated facilities, awareness of public lands recreation attractions, and unanticipated use trends and activities are some of the factors requiring the BLM to revise the Eastern Colorado RMP.

Through the RMP process, the BLM may designate Recreation Management Areas (RMAs), Special or Extensive, where high quality recreation opportunities are recognized. Special Recreation Management Areas (SRMAs) are designated where recreation is the principal management focus and there is a need to protect and enhance a targeted set of recreation objectives. The RGFO currently has two SRMAs: the Gold Belt SRMA and the Arkansas River SRMA. Extensive Recreation Management Areas (ERMAs) are managed to support and sustain recreation objectives that are commensurate with other resources and resource uses. Lands that are not designated as a Recreation Management Area receive dispersed recreation management, which offers little in the way of visitor services or developed recreation facilities.

Potential Decisions:

Recreation management planning as part of the Eastern Colorado RMP/EIS may:

- Identify RMAs (Special and Extensive) and, where needed, delineate discrete recreation management zone (RMZ) boundaries for specific recreation opportunities
- Establish RMA and RMZ measureable recreation objectives. These objectives must define specific recreation opportunities that will become the focus of recreation and visitor services management
- Identify necessary management actions and allowable use decisions for recreation and other programs to achieve recreation objectives

Planning Issues:

- Are there areas that the BLM should identify for focused recreation management? What should the recreation objectives for these areas be? What settings are necessary to achieve these objectives?
- How can the BLM resolve conflicts between increasing demand for various recreation uses and protection of other resource values?
- Within other programs, what terms and conditions are necessary to achieve the RMA objectives?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional recreation management topics that should be covered in the EIS?
2. What areas should be designated and managed as RMAs (Special or Extensive) to achieve specific recreation objectives?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Socioeconomic Data

BLM

Sources and Types of Data

BLM will consider many aspects of the local economy and social/cultural systems in the data gathering phase. We will collect many types of data, from multiple sources. These include:

- BLM – Public input from the Envisioning Workshops and Scoping Process
- BLM – Resource use data such as:
  - Grazing permits (number of permits, animal unit months permitted and billed)
  - Oil and gas drilling
  - Other mineral permits
  - Recreation visitation
  - Renewable energy projects
- Dept. of Interior Office of Natural Resources Revenue – Mineral production volumes and values
- Economic Profile System – A data system sponsored by BLM and the U.S. Forest Service
- Existing research and literature on BLM stakeholders' interests, attitudes, values, and beliefs
- Local governments – Plans, reports, and other data
- Non-government organizations – Special studies and data
- State government – Population projections, resource use data, and economic data
- U.S. Bureau of Labor Statistics – Employment data
- U.S. Bureau of Economic Analysis – Industry data
- U.S. Census Bureau – Demographic and economic data

Selected Socioeconomic Indicators

The following pages present examples of data for various categories of socioeconomic indicators, including population indicators, demographic indictors, employment indicators, income indicators, and housing indicators.

Data Scale

The tables in this handout show indicators on a county basis. Socioeconomic analyses for the RMP/EIS will use data at a variety of geographic levels, potentially including:

- U.S. and Colorado
- Socioeconomic Study Area – May be larger than the planning area
- Study Area Regions – Sub-areas of the socioeconomic study area
- Counties
- Incorporated and Unincorporated Places
- Census Tracts and Census Block Groups – Smaller geographic areas

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Can you suggest or provide any data, reports, or other information on social and economic topics relevant to BLM public lands? Feel free to attach documents to your email or include web page references.
2. What are your thoughts on defining regions to facilitate analysis? For instance, what groups of counties share similar social and economic characteristics? What counties should not be grouped together?
3. What other thoughts do you have about socioeconomic data?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Population and Demographic Indicators

County	Population 2000	Population 2010	Population 2014	Population Change 2000-2014	Annual Growth Rate 2000-2014	Median Age 2011	Minority Population 2011
Adams	363,857	441,603	480,718	116,861	2.0%	32.6	47%
Arapahoe	487,967	572,003	618,821	130,854	1.7%	35.9	37%
Baca	4,517	3,788	3,645	-872	-1.5%	47.8	13%
Bent	5,998	6,499	5,630	-368	-0.5%	40.4	46%
Boulder	291,288	294,567	313,333	22,045	0.5%	35.7	21%
Broomfield	N/A	55,889	62,138	N/A	N/A	35.9	22%
Chaffee	16,242	17,809	18,363	2,121	0.9%	47.8	14%
Cheyenne	2,231	1,836	1,871	-360	-1.2%	38.6	15%
Clear Creek	9,322	9,088	9,187	-135	-0.1%	46.8	8%
Crowley	5,518	5,823	5,360	-158	-0.2%	38.9	41%
Custer	3,503	4,255	4,361	858	1.6%	54.6	6%
Denver	554,636	600,158	663,862	109,226	1.3%	33.8	47%
Douglas	175,766	285,465	314,638	138,872	4.2%	36.9	15%
El Paso	516,929	622,263	663,519	146,590	1.8%	33.8	29%
Elbert	19,872	23,086	24,195	4,323	1.4%	43.8	10%
Fremont	46,145	46,824	46,502	357	0.1%	43.4	24%
Gilpin	4,757	5,441	5,851	1,094	1.5%	44.8	11%
Huerfano	7,862	6,711	6,462	-1,400	-1.4%	52.6	42%
Jefferson	527,056	534,543	558,503	31,447	0.4%	40.4	21%
Kiowa	1,622	1,398	1,402	-220	-1.0%	40.9	7%
Kit Carson	8,011	8,270	8,072	61	0.1%	38.8	23%
Lake	7,812	7,310	7,357	-455	-0.4%	34.9	38%
Larimer	251,494	299,630	324,122	72,628	1.8%	35.5	16%
Las Animas	15,207	15,507	14,052	-1,155	-0.6%	44.4	46%
Lincoln	6,087	5,467	5,510	-577	-0.7%	39.3	26%
Logan	20,504	22,709	22,524	2,020	0.7%	37.2	19%
Morgan	27,171	28,159	28,328	1,157	0.3%	36	39%
Otero	20,311	18,831	18,488	-1,823	-0.7%	40.5	44%
Park	14,523	16,206	16,345	1,822	0.8%	47.5	9%
Phillips	4,480	4,442	4,363	-117	-0.2%	40.4	27%
Prowers	14,483	12,551	12,034	-2,449	-1.3%	37.1	38%
Pueblo	141,472	159,063	161,875	20,403	1.0%	38.9	46%
Saguache	5,917	6,108	6,196	279	0.3%	44.6	44%
Sedgwick	2,747	2,379	2,348	-399	-1.1%	47.2	20%
Teller	20,555	23,350	23,389	2,834	0.9%	48	10%
Washington	4,926	4,814	4,780	-146	-0.2%	44.2	11%
Weld	180,936	252,825	277,670	96,734	3.1%	33.5	33%
Yuma	9,841	10,043	10,202	361	0.3%	35.8	22%
TOTALS	3,791,724	4,436,713	4,756,016	964,292	1.6%	--	--

Source: U.S. Census Bureau

Employment Indicators

County	Unemployment Rate 2014	Management, Business, Science, and Arts Occupations 2011	Service Occupations 2011	Sales and Office Occupations 2011	Natural Resources, Construction, and Maintenance Occupations 2011	Production, Transportation, and Material Moving Occupations 2011
Adams	5.7%	29%	18%	26%	13%	14%
Arapahoe	4.9%	40%	17%	27%	8%	8%
Baca	2.8%	37%	18%	19%	16%	11%
Bent	5.3%	35%	27%	13%	16%	10%
Boulder	4.1%	53%	15%	20%	5%	7%
Broomfield	4.3%	49%	12%	27%	5%	7%
Chaffee	4.4%	37%	19%	26%	12%	7%
Cheyenne	2.9%	42%	14%	17%	20%	8%
Clear Creek	4.7%	34%	15%	28%	12%	12%
Crowley	6.1%	27%	30%	18%	13%	12%
Custer	4.7%	27%	22%	19%	26%	6%
Denver	4.9%	43%	18%	24%	7%	8%
Douglas	4.0%	54%	11%	26%	4%	5%
El Paso	6.0%	40%	18%	24%	8%	9%
Elbert	4.3%	41%	14%	24%	13%	9%
Fremont	8.1%	27%	31%	22%	13%	8%
Gilpin	4.4%	35%	22%	24%	13%	7%
Huerfano	10.1%	38%	19%	20%	13%	10%
Jefferson	4.6%	44%	15%	26%	8%	8%
Kiowa	3.4%	41%	17%	22%	14%	7%
Kit Carson	3.1%	28%	22%	21%	18%	12%
Lake	4.8%	32%	21%	18%	23%	6%
Larimer	4.3%	43%	18%	23%	8%	8%
Las Animas	7.6%	26%	20%	22%	21%	11%
Lincoln	4.1%	33%	26%	23%	12%	7%
Logan	3.8%	23%	22%	26%	13%	16%
Morgan	4.6%	26%	16%	20%	15%	23%
Otero	7.6%	32%	21%	26%	12%	10%
Park	4.6%	32%	19%	25%	16%	9%
Phillips	3.3%	35%	16%	19%	22%	8%
Prowers	4.8%	31%	21%	22%	14%	13%
Pueblo	7.3%	29%	23%	26%	10%	12%
Saguache	8.6%	29%	16%	18%	24%	13%
Sedgwick	4.6%	28%	24%	20%	14%	13%
Teller	5.9%	38%	23%	22%	9%	8%
Washington	3.2%	40%	13%	20%	15%	13%
Weld	4.5%	33%	17%	24%	13%	13%
Yuma	3.3%	25%	15%	25%	27%	8%

Sources: Unemployment rate from U.S. Bureau of Labor Statistics; all other data from U.S. Census Bureau

Income and Housing Indicators

County	Per Capita Income 2011	Median Family Income 2011	Population in Poverty 2011	Occupied Housing Units 2011	Occupied Units That Are Owner-Occupied 2011	Median Value of Owner-Occupied Units 2011	Median Gross Rent of Rental Units 2011
Adams	$24,195	$64,611	14%	94%	66%	$186,600	$967
Arapahoe	$32,595	$73,649	12%	94%	63%	$230,700	$981
Baca	$22,318	$48,080	15%	74%	74%	$73,500	$508
Bent	$15,081	$42,598	19%	84%	64%	$75,500	$635
Boulder	$38,011	$92,667	14%	94%	63%	$350,900	$1,113
Broomfield	$37,442	$96,787	7%	95%	68%	$275,900	$1,165
Chaffee	$27,182	$59,631	8%	78%	76%	$262,300	$818
Cheyenne	$23,647	$63,938	7%	80%	77%	$81,700	$508
Clear Creek	$41,716	$89,583	10%	71%	81%	$268,500	$803
Crowley	$17,187	$41,270	29%	76%	80%	$78,800	$583
Custer	$25,761	$50,000	15%	49%	81%	$216,200	$685
Denver	$33,251	$63,705	19%	93%	50%	$249,100	$883
Douglas	$43,634	$112,930	4%	96%	81%	$335,600	$1,273
El Paso	$28,867	$70,728	12%	93%	64%	$213,500	$910
Elbert	$36,077	$89,653	7%	92%	90%	$333,600	$1,085
Fremont	$18,954	$48,623	18%	88%	71%	$159,500	$713
Gilpin	$38,022	$87,639	11%	71%	76%	$281,700	$1,029
Huerfano	$24,058	$41,862	21%	60%	73%	$152,400	$744
Jefferson	$36,087	$84,957	9%	95%	71%	$262,400	$979
Kiowa	$22,482	$55,938	17%	72%	73%	$79,400	$661
Kit Carson	$21,850	$57,538	14%	87%	66%	$121,600	$612
Lake	$25,029	$57,267	14%	70%	66%	$164,400	$858
Larimer	$30,740	$76,194	14%	91%	66%	$247,100	$973
Las Animas	$22,180	$53,089	18%	73%	69%	$151,500	$711
Lincoln	$19,703	$51,875	14%	80%	68%	$115,000	$647
Logan	$22,581	$50,000	18%	90%	69%	$119,800	$617
Morgan	$20,680	$50,202	13%	91%	64%	$137,000	$695
Otero	$19,078	$41,943	25%	83%	65%	$91,800	$630
Park	$31,504	$76,104	9%	50%	89%	$247,300	$1,180
Phillips	$20,720	$54,583	20%	88%	69%	$132,700	$595
Prowers	$18,941	$44,481	23%	84%	66%	$86,100	$541
Pueblo	$21,940	$52,705	19%	90%	66%	$138,700	$736
Saguache	$20,726	$41,154	25%	70%	67%	$135,400	$626
Sedgwick	$21,536	$53,500	19%	72%	69%	$81,400	$514
Teller	$31,075	$73,379	7%	75%	81%	$226,900	$868
Washington	$24,977	$55,606	13%	84%	73%	$110,500	$575
Weld	$25,468	$66,840	15%	93%	70%	$191,500	$835
Yuma	$22,498	$53,502	8%	86%	67%	$136,600	$562

Source: U.S. Census Bureau

Environmental Justice

BLM

Concept and Approach

The concept of environmental justice first became a required consideration for federal agencies with the publication of Executive Order (EO) 12898 on February 11, 1994. Environmental justice concerns:

> *Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (BLM Land Use Planning Handbook).*

The EO requires each federal agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations" (EO 12898, §59 *Federal Register* 7629, 1994). Environmental effects include economic, social, and cultural effects (i.e., socioeconomic effects), as well as impacts on the biological or physical environment that affect people.

BLM will conduct a screening analysis of the study area for the Eastern Colorado Resource Management Plan (RMP) to identify if any potential environmental justice populations are present. The study area for socioeconomic analysis will include all counties that are wholly or partially within the RMP planning area. Subsequently, BLM will determine if the RMP management alternatives have disproportionately high and adverse effects on those populations.

Definitions

After publication of the EO, the Council on Environmental Quality (CEQ), part of the Executive Office of the President, issued guidance for considering environmental justice within the National Environmental Policy Act process (CEQ, 1997). This guidance defines minorities as individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic. The guidance further defines a minority population as follows:

> *Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.*

The guidance also makes clear that Indian Tribes in the affected area should also be considered in the environmental justice analysis.

The CEQ guidance states that low-income populations should be determined using the annual statistical poverty thresholds from the Bureau of the Census. That is, persons living under the poverty income threshold are potentially of concern. The guidance does not specify how to identify a low-income population, but in practice the same approach used for minority populations is often used: where the percentage in poverty is meaningfully greater that the percentage in the general population or an appropriate comparison area.

The CEQ guidance does not define what constitutes "meaningfully greater." This is determined based on the nature of the study area and best practices followed by agencies and socioeconomic analysts.

The EO requires agencies to address "disproportionately high and adverse human health or environmental effects." The terms adverse and disproportionate are key to an environmental justice impacts analysis. An environmental justice impact occurs only if the impact on a minority or low-income population is harmful,

and "appreciably exceeds or is likely to appreciably exceed" the impact to the general population or other appropriate comparison group (CEQ, 1997).

Methodology

BLM will use demographic and economic data from the U.S. Census Bureau to identify communities within the study area that have high levels of minority and/or low-income populations compared to the total population of Colorado. We will use the most recent data available at a sub-county geographic level. BLM will flag the identified communities for further consideration in the impact analysis phase. In this phase, BLM will assess whether and how each management alternative may adversely and disproportionately affect the identified communities. This involves assessing the types of human health and environmental effects, their significance, and the proximity of identified communities to the effects of the management actions. As an example, if BLM finds that oil and gas development would be disproportionately located near minority or low-income communities, and would adversely and significantly affect those communities, BLM would identify this as an environmental justice impact.

If BLM identifies environmental justice impacts from proposed management actions, it would then develop measures to eliminate or mitigate those impacts. Such measures might include changing the location of certain activities or regulating the activities to reduce their impact.

Public Involvement

The CEQ guidance and the presidential memo that accompanied the Executive Order emphasize that agencies should provide opportunities for effective participation by minority and low-income communities in the NEPA process. This includes identifying potential effects and mitigation measures in consultation with affected communities.

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. What BLM management actions might have disproportionately high and adverse human health or environmental effects on minority or low-income populations?
2. Where are these communities located?
3. How can BLM best involve these communities in the planning process?
4. What specific organizations represent minority or low-income populations in the planning area?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

References

CEQ (Council on Environmental Quality). 1997. Environmental Justice: Guidance Under the National Environmental Policy Act. http://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ-EJGuidance.pdf.

Solid Minerals

BLM

Background Information

The Royal Gorge Field Office (RGFO) contains many different types of solid minerals that are used in energy, manufacturing, and construction sectors to meet regional, national, and even worldwide demands. Resource management objectives are centered on the promotion of an adequate and stable supply of materials necessary to maintain national security, economic well-being, and industrial production with appropriate attention to a long-term balance between resource production, energy use, a healthy environment, natural resources conservation, and social needs.

Solid mineral resources are broken down into mineral materials, solid leasable minerals, and locatable minerals. Mineral materials include common variety sand, stone, gravel, pumice, pumicite, clay, rock, and petrified wood. Mineral materials are available through a series of competitive and noncompetitive sales and by free use permits to government agencies and nonprofit organizations in limited quantities. Current operations mostly consist of construction aggregate, decorative stone, building stone, and clay.

Solid leasable minerals include coal, phosphate, and sodium resources as designated by the Mineral Leasing Act of 1920. Solid leasable minerals within the RGFO include coal resources managed in the Denver and Raton Basin Coal regions. Additionally, the RGFO is processing a lease by application for coal resources and an application for exploration for coal resources, both located west of Trinidad, Colorado.

Locatable mineral development on public lands is authorized under the General Mining Law of 1872, as amended, and regulated under 43 CFR 3809. Locatable mineral activity within the RGFO is broken down into casual use, notice level, and plan level operations. Exploration and mining operations currently conducted within RGFO involve gold, uranium, and amethyst.

Potential Decisions:

Solid mineral planning as part of the Eastern Colorado RMP/EIS may:

- Examine Areas of Critical Environmental Concern to understand mineral potential throughout these areas and determine where or if locatable mineral withdrawals are needed
- Identify lands to be open or closed to solid mineral development based on mineral potential and other resource needs
- Update the coal screening process used to determine areas to be further considered for leasing based on changes in land tenure and mineral potential

Planning Issues:

- Which parts of the planning area are appropriate for locatable mineral entry and locatable mineral exploration and/or development? Which are not? Why?
- Which areas in the planning area are appropriate for mineral material disposal? Which are not? Why?
- Which areas in the planning area are appropriate for coal and non-energy leasable mineral exploration and/or development? Which are not? Why?
- What considerations should BLM address in management of new technology, such as solution mining?
- How can the BLM better coordinate with other entities such as the Colorado Division of Reclamation, Mining, and Safety on mineral exploration or development projects to determine mitigation and reclamation requirements and increase efficiency when administering multiple sets of regulations?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. How can the BLM balance extraction of solid mineral resource supplies to meet current and future needs with protection of other resources?
2. What best management practices and mitigation measures may be needed for solid mineral decisions?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Special Designations

BLM

Special designation decisions may be made by the Royal Gorge Field Office (RGFO) during the land use planning process. Special designations include Areas of Critical Environmental Concern (ACECs), Wilderness Study Areas (WSAs), Instant Study Areas (ISAs), and Wild and Scenic Rivers (WSRs).

Areas of Critical Environmental Concern

ACECs are BLM-administered lands where special management is required in order to protect identified values. To be eligible for designation as an ACEC, an area must meet criteria for relevance and importance. ACECs possess significant cultural or scenic values, fish or wildlife resources (including threatened and endangered species), or natural hazards. This generally requires substantial qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. The following nine ACECs were designated in the 1996 Royal Gorge RMP.

- Arkansas Canyonlands – 23,921 acres
- Beaver Creek – 12,081 acres
- Browns Canyon – 11,697 acres
- Cucharas Canyon – 1,866 acres
- Droney Gulch – 705 acres
- Garden Park – 2,728 acres
- Grape Creek – 15,978 acres
- Mosquito Pass – 4,036 acres
- Phantom Canyon – 6,096 acres

Potential Decisions:
The BLM could make the following decisions for ACECs as part of the Eastern Colorado RMP/EIS:

- The BLM could change the status of current ACECs within the RGFO. The BLM will review ACECs to ensure their designations are still relevant and to determine whether they should continue to be managed as ACECs.
- Additional ACECs and the special resources associated with them may be identified.

Planning Issues:

- Given the current condition of resources and resource values, are current ACECs appropriate?
- Are there additional areas that should be considered as ACECs?

Wilderness Study Areas, Instant Study Areas

Preservation of Wilderness characteristics is part of the BLM's multiple use mandate, and wilderness is recognized as a resource value to be considered during land use planning. ISAs and WSAs are generally natural, undeveloped, and untrammeled; have outstanding opportunities for solitude or primitive and unconfined recreation; and may contain ecological, geological, or other features of scientific, scenic, or historical value. There are no designated wilderness areas in the RGFO. There are five WSAs and one ISA in the planning area:

- Beaver Creek WSA – 25,150 acres
- Browns Canyon WSA – 6,614 acres
- Upper Grape Creek WSA – 10,200 acres
- Lower Grape Creek WSA – 11,220 acres
- McIntyre Hills WSA – 16,800 acres
- High Mesa Grassland ISA – 690 acres

Potential Decisions:

- The BLM will consider management actions for existing WSAs and ISAs in the event that they area released from wilderness consideration.

Planning Issues:

- How should the BLM manage existing WSAs and ISAs in the event they are released from wilderness consideration?

Under the wilderness review program, designated WSAs are managed in accordance with the BLM's Interim Management Plan. This management will continue until Congress either designates the WSAs as wilderness or releases the lands from further wilderness consideration. The BLM cannot designate new WSAs or wilderness areas.

BLM

Wild and Scenic Rivers

A WSR is a national designation for a river and its immediate environment with outstanding scenic, recreational, geologic, fish and wildlife, cultural, and other similar values. To be eligible for WSR designation, a river must be preserved in a free-flowing condition. There are no designated segments of the National Wild and Scenic Rivers System within the RGFO. The BLM will conduct further WSR studies as part of this RMP planning process.

Potential Decisions:

- The BLM will identify eligible WSRs and will consider their suitability for inclusion in the National Wild and Scenic Rivers System.

Planning Issues:

- Given the current condition of rivers, are there any wild and scenic recommendations?

Split Estate

BLM

Background Information

The BLM manages 700 million acres of subsurface mineral estate nationwide, including areas where the surface estates are owned or administered by different entities. These areas are called split estate. The BLM manages approximately 58 million acres of split estate where federal mineral estate lies beneath surface that is privately owned. The majority of federal oil and gas wells in the RGFO are on surface lands not managed by the federal government. In many cases, the surface rights and mineral rights were severed under the terms of United States homesteading laws. These and other federal laws, regulations, and BLM policy directives give BLM managers the authority and direction for administering the development of federal mineral resources beneath privately owned surface. These laws, regulations, and policies include:

- Coal Lands Acts of 1909 and 1910
- Agricultural Entry Act of 1914
- Stock Raising Homestead Act of 1916, as amended
- Mineral Leasing Act of 1920, as amended
- Act of May 21, 1930
- Energy Policy Act of 2005
- Federal Land Policy and Management Act of 1976
- Onshore Oil and Gas Orders
- BLM and Forest Service Oil and Gas Gold Book
- BLM Instruction Memorandums

Oil and Gas

Mineral rights are considered dominant, meaning that they take precedence over the other property rights, including those associated with surface ownership. However, the mineral owner must show due regard for the interests of the surface estate owner and occupy only those portions of the surface that are reasonably necessary to develop the mineral estate. Under the laws, regulations, and procedures listed above, the leasing and development of federal mineral resources occur in four phases:

- Planning and leasing
- Permitting
- Drilling and production
- Well Plugging and Surface reclamation

The BLM's split estate policy only applies to situations where the surface rights are owned by someone other than the federal government and the mineral resources development rights are publically held and managed by the federal government. The State of Colorado also has some authority over oil and gas operations on privately owned surface estate. The BLM administers public lands, including the federal mineral estate, to enhance the quality of life for present and future generations of Americans, under a mandate of multiple use as described in the Federal Land Policy and Management Act of 1976. In the Energy Policy Act of 2005, Congress ordered a report reviewing current policies and practices that the BLM uses in managing oil and natural gas resources in split estate situations in order to more clearly identify the rights of the surface owner in split estate mineral situations. Congress directed the BLM to consult with affected property owners, representatives of the oil and gas industry, and other interested parties while completing the review to consider how best to facilitate reasonable access for federal oil and gas activities and minimize impacts on non-federal surface. In response, the BLM revised the Onshore Oil and Gas Order Number 1 and issued the Oil and Gas Gold Book in 2007.

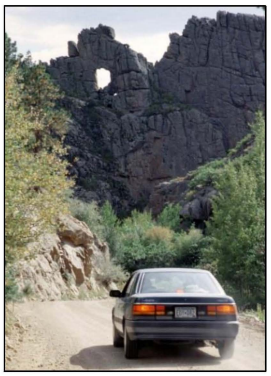
Parcels of mineral estate open for leasing under the terms of the RMP may be nominated for leasing by interested parties. The BLM reviews every nomination to ensure that leasing the parcel would conform to the terms of the RMP. The Eastern Colorado RMP/EIS process will determine areas of federal mineral estate, including split estate that may be available for leasing. The public is encouraged to participate and comment on the preparation of the RMP in reference to split estate land use.

Public Scoping for the Eastern Colorado RMP/EIS

Travel Management

BLM

Background Information



Travel and transportation are an integral part of virtually every activity that occurs on BLM-administered lands. Recreation, livestock grazing, wildlife, commodity resources, rights-of-way, access to private inholdings, electronic sites maintenance, and the day-to-day management and monitoring of the Royal Gorge Field Office (RGFO) all rely on effective travel management planning.

The BLM's land use planning policies require all BLM-administered lands to have off-highway vehicle (OHV) area designations. The BLM must designate areas as open, limited, or closed to motorized travel activities. The previous Royal Gorge RMP limited travel to existing routes, with direction to move to a designated route network. Designations were established through the 1986 Northeast RMP and the 1996 Royal Gorge RMP along with subsequent plan amendments. Four travel management plans have been developed and implemented within the RGFO: Box Creek, Arkansas River, Gold Belt, and Fourmile. It is not anticipated that this revision process will modify or overwrite these existing travel management plans.

The BLM doesn't envision a comprehensive travel management plan as part of the RMP revision process that will designate specific routes as open or closed. However, the RMP will provide the basis for future travel management planning and help set guidelines for making road and trail network adjustments throughout the life of the RMP. This may include changes in OHV area designations.

Potential Decisions:

Travel management planning as part of the Eastern Colorado RMP/EIS may:

- Produce a map of the existing road and trail network
- Define short-term management guidance for road and trail access and activities in areas or sub-areas not subject to an existing travel management plan
- Outline additional data needs and a strategy to collect needed information
- Provide a clear planning sequence, including public collaboration, criteria, and constraints for subsequent road and trail selection and identification
- Identify any easements and rights-of-way needed (by the BLM or others) to maintain the existing road and trail network

Planning Issues:

- How can the BLM manage the travel network to reduce conflicts among resources and resource uses and to provide access where needed?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional travel management topics that should be covered in the EIS?
2. Where and how should the BLM plan for motorized and/or non-motorized vehicle use on public lands?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

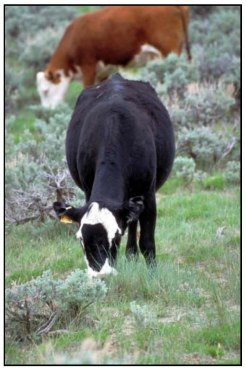
Public Scoping for the Eastern Colorado RMP/EIS

Vegetation and Livestock Grazing

BLM

Background Information

Vegetative communities are complex and interdependent groups of plant species that capture energy, cycle nutrients, fix carbon, and influence the atmosphere, water, and soil. They are a critical component of, and contribute valuable services to, a healthy ecosystem. The BLM Land Health Standards require the BLM to manage public lands for healthy plant communities. Health is measured by a community's productivity, diversity, number of native and desirable species, absence of weeds, functional use of sunlight and water, and nutrient cycling.



Healthy plant communities provide forage for livestock grazing. Grazing is a widespread year-round resource use activity within the planning area. Currently, there are approximately 602,000 acres of BLM-administered land allocated towards livestock use within the Royal Gorge Field Office (RGFO). This includes many small isolated tracts of BLM-administered lands surrounded by private lands. These inholdings present livestock grazing management challenges, such as lack of access and difficulties controlling livestock due to inadequate fencing.

Potential Decisions:

Vegetation and livestock grazing management as part of the Eastern Colorado RMP/EIS may:

- Identify desired outcomes for vegetation resources
- Identify site-specific vegetation management practices
- Identify lands available or not available for livestock grazing
- Identify the amount of existing forage available for livestock (expressed in animal unit months) and the future anticipated amount of forage available for livestock
- Identify guidelines and criteria for future allotment-specific adjustments in the amount of forage available for livestock, season of use, or other grazing management practices

Planning Issues:

- How should the BLM resolve potential conflicts between livestock grazing and other resources and uses?
- How will the BLM manage toward meeting land health standards?
- How should the BLM manage noxious weeds and aquatic nuisance species in the planning area?
- How should the BLM address changing vegetation composition, such as pinyon-juniper woodlands encroachment on native grassland communities?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional vegetation and livestock grazing topics that should be covered in the EIS?
2. Vegetation treatments can be expensive and do not always respond in the desired way. Where in the planning area should the BLM focus vegetation treatments? What areas should be left to function naturally?
3. Can you recommend sources of information that can be used?

Please submit your comments or information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Visual Resources

BLM

Background Information

The BLM visual resource management (VRM) system provides a way to inventory and analyze scenic values in order to determine appropriate levels of management. VRM serves as a tool to identify and map essential landscape settings in line with public preferences and recreation-related experiences now and in the future. The VRM system helps ensure that actions taking place today will benefit the visual qualities associated with BLM landscapes while protecting those visual resources for the future. For large portions of the Royal Gorge Field Office (RGFO), scenic quality is of national significance and an important part of the local and state economy.

Management classes are assigned based upon the visual resource inventory, as well as consideration of other land uses. The visual resource inventory was completed in 2015, and management class designations are needed for the RGFO. In assigning management classes, fragmented ownership will be an important consideration to avoid managing scenic values on small land parcels where BLM land management is too limited to affect the overall landscape. The RMP revision will evaluate the planning area's scenic resources along with the demand for other resources to provide a balanced approach to meeting the BLM's multiple use mandates.

Potential Decisions:

VRM planning as part of the Eastern Colorado RMP/EIS may:

- Designate VRM management classes for all areas of BLM-administered land based on an inventory of visual resources and management considerations for other land uses

Planning Issues

- What are the critical viewshed areas and how should they be managed?
- What are the potential effects of large-scale projects on the area's visual resources?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional visual resource topics that should be covered in the EIS?
2. How should the BLM manage sensitive viewsheds and corridors?
3. Can you recommend sources of information that should be used in the RMP/EIS?

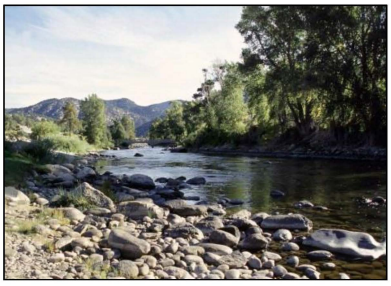
Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

Public Scoping for the Eastern Colorado RMP/EIS

Water and Riparian Resources

BLM

Background Information



Water and riparian areas are some of the most productive and important ecosystems found on BLM-administered lands. These areas play an integral role in restoring and maintaining the chemical, physical, and biological integrity of the nation's water resources. They stabilize water supplies, thus ameliorating both floods and droughts. Functioning streams and riparian areas provide many values for other resources such as fish, wildlife, and recreation.

Water and riparian resources are diverse throughout the planning area, and management is complicated by noncontiguous ownership patterns. The BLM rarely manages entire watersheds; therefore, cooperation with various groups, adjacent landowners, and other agencies is critical. The planning area covers parts of three major sub-basins: the Upper Arkansas, Upper South Platte, and Republican Rivers. Agricultural activities account for the largest amount of water used within these sub-basins, and runoff also serves as a critical municipal water source to Front Range cities and towns.

Potential Decisions:

Water and riparian management planning as part of the Eastern Colorado RMP/EIS may:

- Identify area-wide use restrictions or other protective measures to meet tribal, state, and local water quality requirements
- Identify measures to ensure water availability for multiple use management and functioning and healthy riparian and upland systems
- Identify desired outcomes (including standards or goals under the Clean Water Act)

Planning Issues:

- What efficiencies need to be employed to manage riparian area grazing with aging infrastructure (e.g., fences and water developments) and a changing landscape that has seen rapid subdivision of adjacent ranch lands?
- What water flow and water right protection strategies need to be incorporated into the planning process to protect flows of BLM-administered water-dependent resources? What anticipated future water-development needs to be evaluated for large rivers, creeks, small seeps, springs, and fens?
- How should the BLM manage resource uses that cause impairment (e.g., weed invasion) to riparian resources?
- How should the BLM prepare and manage for drought conditions?

Wildlife, Fisheries, and Special Status Species

BLM

Background Information

The Royal Gorge Field Office (RGFO) supports a variety of plants, fish, and wildlife, including birds, small mammals, big game, carnivores, and reptiles. Dominant vegetation types in the planning area include tall and low shrublands, grassland, woodland, forest, and riparian/aquatic. High-priority wildlife species (due to their economic value, regulatory status, high public interest, or other qualities) within the RGFO are upland game birds, migratory birds, raptors, bighorn sheep, black bear, elk, mountain lion, pronghorn, and bats.

According to the US Fish and Wildlife Service, there are 20 federally listed threatened, endangered or proposed wildlife and plant species potentially occurring in or affected by actions within the planning area:

- Black-footed ferret, Endangered
- Canada lynx, Threatened
- Colorado butterfly plant, Threatened
- Greenback cutthroat trout, Threatened
- Least Tern (interior population), Endangered
- Lesser prairie-chicken, Threatened
- Mexican spotted owl, Threatened
- New Mexico meadow jumping mouse, Endangered
- North Park phacelia, Endangered
- Pallid sturgeon, Endangered
- Pawnee montane skipper, Threatened
- Penland alpine fen mustard, Threatened
- Piping plover, Threatened
- Preble's meadow jumping mouse, Threatened
- Southwestern willow flycatcher, Endangered
- Uncompahgre fritillary butterfly, Endangered
- Ute ladies'-tresses orchid, Threatened
- Western prairie fringed orchid, Threatened
- Whooping crane, Endangered
- Yellow-billed cuckoo, Threatened

The BLM identified 37 Sensitive Species that are known to occur or potentially occur in the planning area. This list considered State of Colorado endangered, threatened, and special status species and plant species ranked as critically imperiled or imperiled by the Colorado Natural Heritage Program. It includes all delisted and candidates for listing under the Endangered Species Act for a 5 year period.

Declining populations, the quality and quantity of reproductive, winter and foraging habitats and associated changes in composition and size of plant and animal assemblages are concerns for future management of wildlife, fisheries, and special status species. Small populations or rare species and their associated habitats are at higher risk for declines. As demand for use of public lands increases, these trends are likely to continue into the future. Oil, gas, coal, and solar resources, along with energy-related projects, have the potential to impact the species' reproductive, foraging, or winter habitats and populations. Other uses such as livestock grazing, water use, realty actions, and recreation could also have impacts. Streams could potentially be affected by development activities, resulting in increased sedimentation and changes in water quality and aquatic habitat.

BLM

Potential Decisions:

Wildlife, fisheries, and special species status management planning as part of the Eastern Colorado RMP/EIS may:

- Identify priority fish, wildlife, and plant species and habitats, in addition to special status species, that would be recognized as important indicators or representative species for specific habitat types and considered as part of management decisions
- Identify key habitats and actions needed that would improve viability of special status species and fish, wildlife, and plant species of interest
- Identify desired future conditions, goals and objectives for wildlife, fisheries, and/or special status species, including the quality and quantity of habitat, population sizes and other factors that allow fish, wildlife and plants of interest to persist and thrive in the planning area
- Identify actions and area-wide use restrictions needed to achieve desired population and habitat conditions in certain locations, under certain circumstances, and based on management actions and proposals, while also maintaining a natural ecological balance and allowing for multiple uses
- Identify specific measures to conserve and enhance essential fish, wildlife, and plant populations, as well as their key habitats
- Identify ecological factors that support healthy fish, wildlife and plant populations, such as plant diversity, a wide array of flowering plants, insect and pollinator diversity, and vegetation structure

Planning Issues:

- How can the BLM eliminate or mitigate threats to fisheries, wildlife, and special status species?
- Where and what kind of restoration actions are needed to maintain fish, wildlife and plant populations and their key habitats?
- What additional information should be acquired, and what population monitoring efforts should be implemented in order to improve conservation efforts?
- What trends and likely future conditions are important to consider when discussing future aquatic habitat, plant, and wildlife management considerations?
- What management actions are needed to protect fish, plant and wildlife populations from diseases, drought, large scale severe fires, other natural events, or loss of key habitats?

Tell Us What You Think!

If you have input on these topics, please share it with us in a scoping comment.

1. Are there additional fish, plant or wildlife ideas or concerns that should be covered in the EIS?
2. Are there BLM-administered lands in the planning area that require management actions to conserve or enhance fish, plant and wildlife diversity or improve their key habitats?
3. Can you recommend sources of information that should be used in the RMP/EIS?

Please submit your comments and other information via email to **ECRMP.comments@blm.gov**

BLM Eastern Colorado Resource Management Plan

Scoping Meetings

June 2015

Who is the BLM?

- Federal land managing agency for more than 245 million surface acres across the US.
- The BLM's multiple-use mission mandates managing public land resources for a variety of uses, such as energy development, livestock grazing, recreation, and timber harvest, while protecting a wide array of natural, cultural, and historical resources.

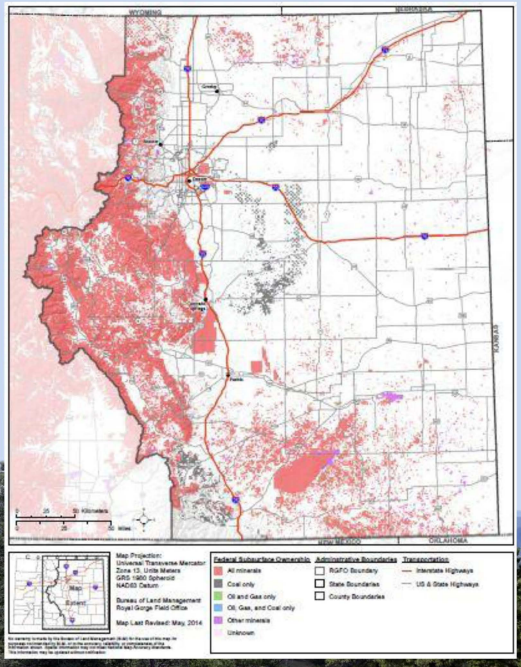
June 2015

What is a Resource Management Plan?
Is the primary tool guiding BLM management activities in support of the dual mandate of multiple use and sustained yield.
Establishes goals and objectives for resource management and the measures needed to achieve them.
June 2015

What is a Resource Management Plan? *(continued)*

- Identifies lands that are open and available for certain uses, including any restrictions, and lands that are closed to certain uses.
- Provides comprehensive management direction for and/or allocates use of all resources.

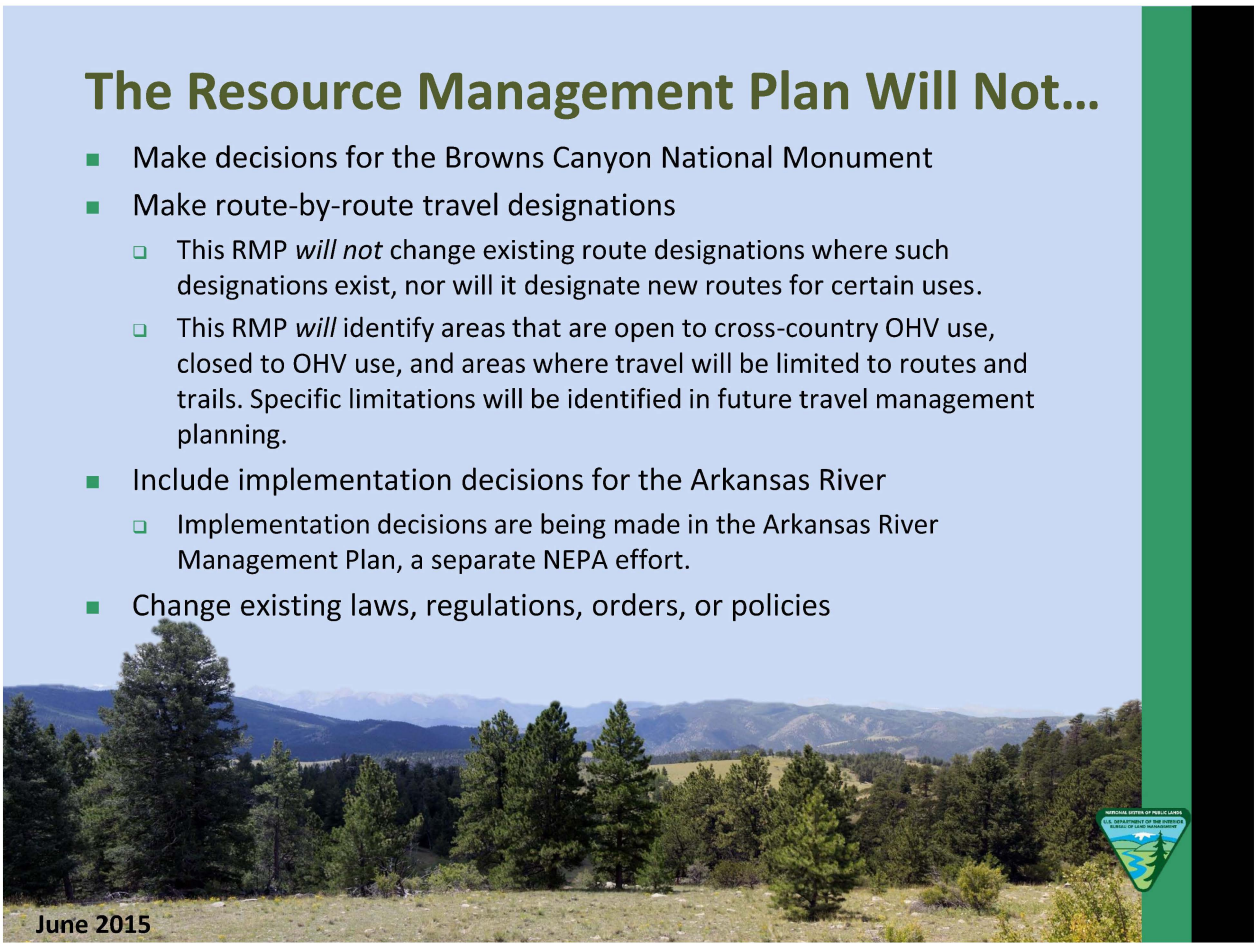
Eastern Colorado RMP Decision Area



- Approximately 668,000 acres of BLM-administered surface lands
- Plus 6,574,000 acres of federal mineral estate beneath non-BLM administered lands*
- BLM planning decisions apply to the decision area

**Some of the minerals shown on the map are beneath National Forest System Lands; decisions for such minerals are included in the applicable Forest Service land use plan.*

June 2015


The Resource Management Plan Will Not…
Make decisions for the Browns Canyon National Monument
Make route-by-route travel designations
This RMP *will not* change existing route designations where such designations exist, nor will it designate new routes for certain uses.
This RMP *will* identify areas that are open to cross-country OHV use, closed to OHV use, and areas where travel will be limited to routes and trails. Specific limitations will be identified in future travel management planning.
Include implementation decisions for the Arkansas River
Implementation decisions are being made in the Arkansas River Management Plan, a separate NEPA effort.
Change existing laws, regulations, orders, or policies
June 2015

Existing Laws, Regulations, and Orders

All decisions will comply with existing laws, regulations, and policies, including, but not limited to:

- Federal Land Policy and Management Act
- Clean Water Act
- Clean Air Act
- General Mining Law of 1872
- Taylor Grazing Act
- Antiquities Act
- Endangered Species Act
- Colorado Basin Salinity Control Act
- Public Rangelands Improvement Act
- Healthy Forests Restoration Act
- National Historic Preservation Act
- Migratory Bird Treaty Act
- Oil and gas onshore orders
- Onshore Oil and Gas Leasing Reform Act
- Paleontological Resources Preservation Act
- Mineral Leasing Act
- Common Varieties of Mineral Materials Act
- Multiple Use Mining Act
- 43 CFR Subtitle B, Chapter II

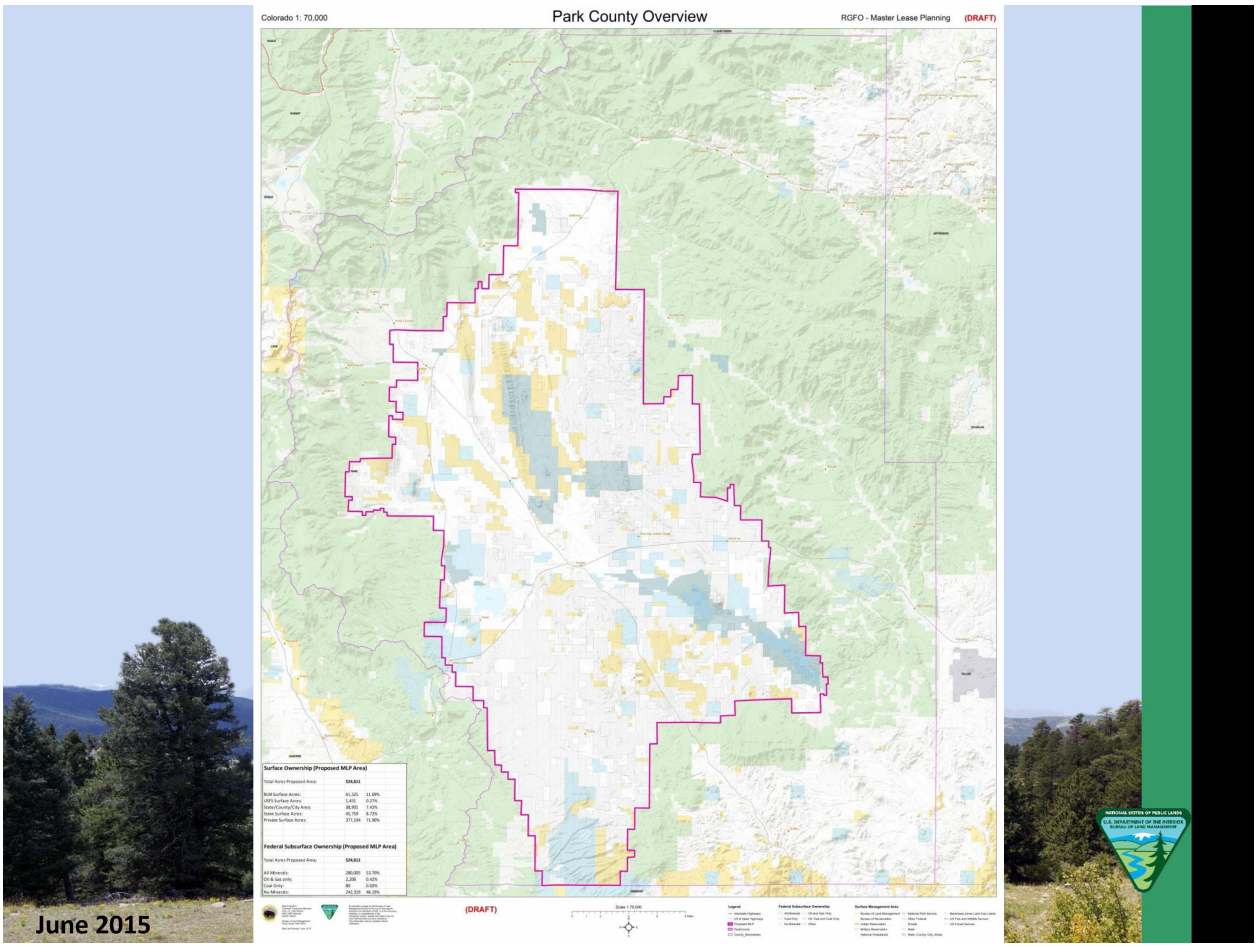
June 2015

Issues to be Addressed

- Restoring Ecological Health
- Air and Atmospheric Values
- Water
- Cultural Resources, Tribal Concerns, and Paleontology
- Visual Resource Management
- Vegetation
- Special Status Species (included Threatened, Endangered, and Sensitive Species)
- Fish and Wildlife
- Fire Management
- Livestock Grazing
- Recreation and Visitor Services
- Lands and Realty
- Mineral Resources
- Master Leasing Plan
- Hazardous Materials
- Special Designations
- Renewable Energy
- Socioeconomics
- Environmental Justice
- Comprehensive Travel and Transportation Management
- Urban Growth
- Forest/Woodland Management

June 2015

What is the South Park Master Leasing Plan?
Plan for oil and gas development at the land-use plan level in a defined area containing a high-level of potential resource concerns
Develop goals for maintaining or improving the condition of natural resource values in the area
Identify resource protection measures and best management practices that may be adopted as lease stipulations in an RMP
June 2015

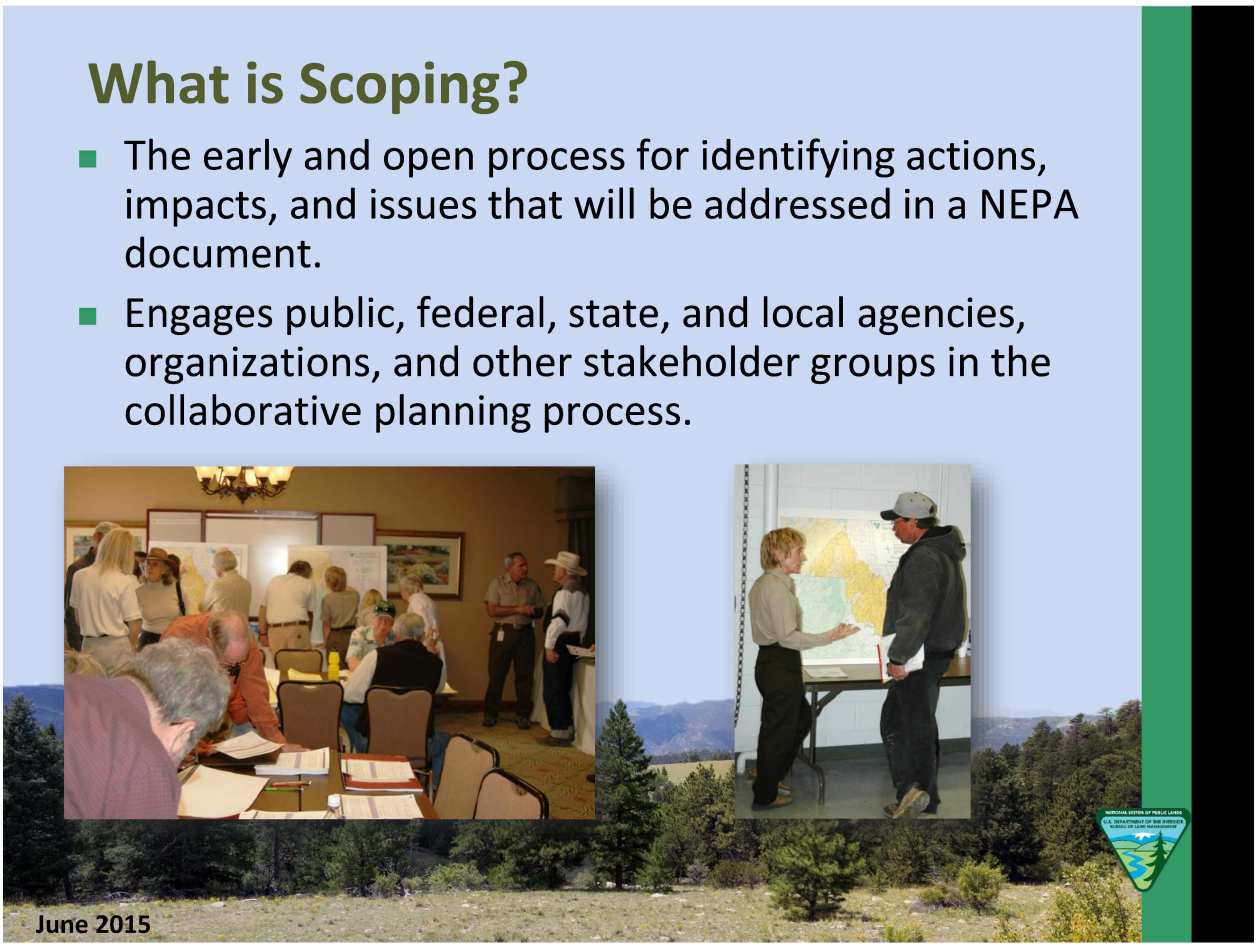

Colorado 1: 70,000
Park County Overview
RGFO - Master Lease Planning
(DRAFT)
Surface Ownership (Proposed MLP Area)
Federal Subsurface Ownership (Proposed MLP Area)
(DRAFT)
June 2015

Example Master Leasing Plan Decisions
Phased leasing
Phased development
Requirements to reduce or capture emissions
Multiple wells on a single pad
Additional mitigation stipulations
June 2015

Who is Involved in the South Park Master Leasing Plan?

- The BLM will ultimately make the decisions related to the South Park Master Leasing Plan
- Park County and the Coalition for Upper South Platte have begun a separate preliminary effort to raise public awareness about the process
- The BLM will seek to engage the public throughout the Master Leasing Plan process

June 2015


What is Scoping?
The early and open process for identifying actions, impacts, and issues that will be addressed in a NEPA document.
Engages public, federal, state, and local agencies, organizations, and other stakeholder groups in the collaborative planning process.
June 2015

What is Scoping? (continued)
Helps the BLM identify planning issues through input received from you.
Identifies related plans, documents, and studies.
June 2015

Envisioning and Scoping

Envisioning

- Public engagement to help the BLM establish a vision for the Eastern Colorado decision area
- Vision to serve as the foundation for the RMP revision and help refine the purpose and need and preliminary planning criteria
- Identify priorities for the planning area at multiple scales, including national, regional, local, and community-based priorities

Scoping

- Public engagement required by the NEPA
- Identify issues to be addressed
- Receive feedback on preliminary planning criteria
- Gather data
- Further refine purpose and need and planning criteria

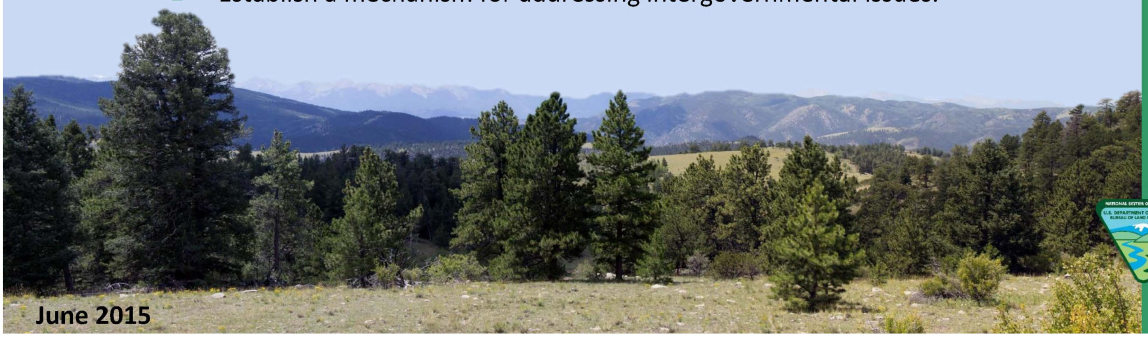
June 2015

Planning Process Activities & Special Studies
Envisioning meetings
Scoping meetings
Tribal consultation
Endangered Species Act Section 7 consultation
Visual resource inventory
Socioeconomic baseline report
Class I paleontological resources overview
Class I cultural resources overview
Air quality report
Reasonably foreseeable development scenario for oil and gas
Federal coal lands review report
Mineral potential report
Renewable energy potential report
Wild and Scenic Rivers eligibility and suitability evaluations
Areas of Critical Environmental Concern evaluation
Lands with wilderness characteristics assessment
June 2015

Who is Helping the BLM with the RMP Revision?
Public/Stakeholder Groups
Participate in envisioning and scoping
Review draft and final documents
Resource Advisory Council
Ensures adequate range of alternatives
June 2015

Who is Helping the BLM with the RMP Revision? *(continued)*

- **Cooperating Agencies**
  - Federal, state, or local government agencies or Indian tribes that work with the BLM, sharing knowledge and resources, to achieve desired outcomes for public lands and communities within statutory and regulatory frameworks.
  - Disclose relevant information early in the analytical process.
    - Ensure consistency between agencies and tribes.
    - Apply available technical expertise and staff support.
    - Avoid duplication with other federal, state, tribal, and local procedures.
    - Establish a mechanism for addressing intergovernmental issues.



June 2015

Who is Helping the BLM with the RMP Revision? *(continued)*

- **Cooperating Agencies *(continued)***
  - Federal Agencies
  - State Agencies
  - Counties

June 2015

Who is Helping the BLM with the RMP Revision? (continued)
Contractors
Facilitate RMP process
Conduct environmental analysis
Prepare supporting environmental studies
Assemble Draft and Final documents
June 2015

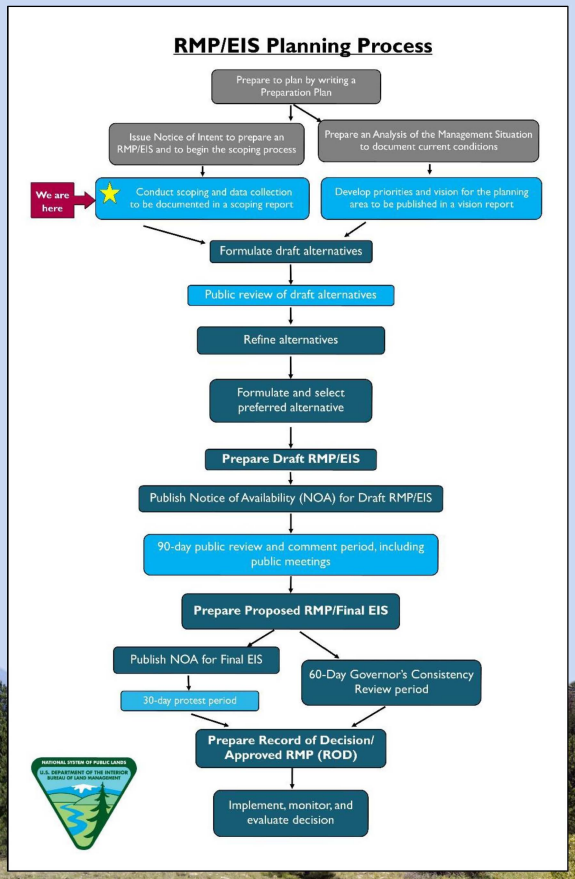
BLM Planning 2.0

- Emphasizes early and continuous public involvement and transparency as well as landscape-level planning.
- This revision will incorporate preliminary concepts from Planning 2.0 and will help inform future Planning 2.0 guidance.
- We welcome suggestions for improving Planning 2.0!
- For more information, visit http://www.blm.gov/wo/st/en/prog/planning/planning_overview/planning_2_0.html

June 2015

Next Steps

- Public comments due to BLM *(July 31, 2015)*
- Scoping report available *(Fall 2015)*
- Develop draft alternatives *(Fall 2015 – Winter 2016)*



June 2015

How to Get Involved

- **Submit comments during scoping** *(June 1 – July 31, 2015)*
  - E-mail: ecrmp.comments@blm.gov
  - Mail to: Bureau of Land Management
    3028 East Main Street
    Cañon City, CO 81212
  - Project Website:
    http://www.blm.gov/co/st/en/fo/rgfo.html

June 2015

Questions?

Project Website: http://www.blm.gov/co/st/en/fo/rgfo.html

Project E-mail Address: ecrmp.comments@blm.gov

John Smeins, RMP Project Manager
Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212
719-269-8581

June 2015

Bureau of Land Management **Eastern Colorado RMP/EIS**

Written submissions are required for the BLM to formally consider your comments regarding the Notice of Intent for the Royal Gorge Field Office to prepare a Resource Management Plan/Environmental Impact Statement. To assure consideration you should provide your comments by **July 31, 2015**. Please fax this completed form to **719-269-8599** (Attention: Eastern Colorado RMP) or mail it to the following address:

Attention: Eastern Colorado RMP
Bureau of Land Management
3028 East Main Street
Cañon City, CO 81212

You may also email comments to **ECRMP.comments@blm.gov** or submit comments through ePlanning at **http://on.doi.gov/1HVULcA**.

* Denotes required fields.

Your Name* _____ Today's Date* _____

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

☐ Individual (no affiliation) ☐ Citizen's Group
☐ Private Industry ☐ Federal, state, tribal, or local government
☐ Regulatory Agency ☐ Elected Representative

Confidentiality Request:

Please indicate if you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act. This request does not preclude the need to complete the required information below.

A request for confidentiality will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

No selection indicates you do not wish to withhold your information.

☐ Please withhold my name only ☐ Please withhold my address only
☐ Please withhold my name and address

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

Mailing Address* _____

City*_____ State*_____ Zip Code*_____

Telephone (optional) _____ Email Address (optional) _____

Would you like to be added to or remain on the Eastern Colorado RMP/EIS mailing list to receive future project-related information?

Yes ☐ No ☐

Continued on next page >>>

Bureau of Land Management **Eastern Colorado RMP/EIS**

Please mark the appropriate category below and write your comments on the lines provided. Feel free to attach additional pages if necessary.

- ☐ Air / Climate / Noise / Visual Resources
- ☐ Cultural and Paleontological Resources
- ☐ Fluid Minerals (Oil and Gas)
- ☐ Forestry / Wildland Fire Management
- ☐ Land Use Authorizations / Utility Corridors / Land Tenure Adjustments / Renewable Energy Development Areas / Withdrawals
- ☐ Lands with Wilderness Characteristics
- ☐ Planning/RMP Amendment Process
- ☐ Recreation/OHV (e.g., Hunting, Fishing, Hiking, or Biking)
- ☐ Socio-economic Concerns / Public Safety / Tribal Interests
- ☐ Solid Minerals (Mining, Coal, Sand and Gravel)
- ☐ Trails and Travel Management
- ☐ Vegetation / Riparian / Noxious Weeds / Livestock Grazing
- ☐ Water / Soils / Geology
- ☐ Wilderness, Wilderness Study Areas and Other Special Designations
- ☐ Wildlife / Fish / Special Status Species
- ☐ Other Concerns (please define)

Public comments submitted for this planning review, including names and street addresses of respondents, will be available for public review at the Royal Gorge Field Office, 3028 East Main Street, Cañon City, CO 81212 during regular business hours (8:00 AM to 4:30 PM), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently in your written comments. Such requests will be honored to the extent allowed by law. Anonymity is not allowable for submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses.

This page intentionally
left blank

Appendix B. Scoping Comments and Summaries

The 60-day formal public scoping period began on June 1, 2015, with the publication of the NOI in the *Federal Register* (Vol. 80, No. 104, page 31063), and ended on July 31, 2015. Comments received until August 3, 2015, are considered in this Scoping Summary Report.

The BLM received 1,626 discrete comments. These comments were classified into one of two process categories: topics that will be addressed in the RMP, and topics that will not be addressed in the RMP. Comments related to topics that will not be addressed in the RMP are not included in this appendix.

Of the 1,626 total comments received, 1,486 (91.4 percent) were classified in the process category of topics that will be addressed in the RMP; all comments in this appendix are within this process category. These comments fall within three subcategories:

1. **Comments related to planning issues.** Comments related to planning issues are those that fall within the planning issue categories identified in Section 2.2.4, Number of Comments by Planning Issue Category (1,287 comments total). See Section B.1, Planning Issues.

2. **Comments related to the planning process.** Planning process comments include comments received on the following subjects (162 comments total): the BLM's Planning 2.0 process; planning criteria; scoping process; consistency with State, local, tribal plans and policies; cooperating agencies; general NEPA requirements; laws and regulations; and monitoring. See Section B.2, Planning Process.

3. **Other general RMP comments.** General RMP comments include those that list multiple resources to be included in the RMP (37 comments total). See Section B.3, Other General RMP Comments.

The 1,486 comments within the process category of topics to be addressed in the RMP are labeled as "comment excerpts" in this appendix. Each comment excerpt was categorized into one of the three subcategories discussed above. Comments in the planning issue subcategory and the planning process subcategory were further divided by the planning issue topic (e.g., air or livestock grazing; see Section B.1, Planning Issues) or planning process topic (e.g., planning criteria or scoping process; see Section B.2, Planning Process), respectively. Each topic includes the number of comments received in that topic, followed by a summary of those comments. Following the summary is each comment excerpt, which includes the commenter name and organization (if applicable and available).

Comment excerpts are included verbatim from the submissions, regardless of typographical or other errors, to maintain the comment's originality and integrity. Comments that were not considered substantive comments (e.g., opinions, personal stories, and general approval or disapproval of present or future management actions) are not included.

The planning process subcategory of topics to be addressed in the RMP (Section B.2, Planning Process) also includes literature cited by commenters and suggested for consideration during RMP development. These literature references will be considered by the BLM during RMP development but are not included in this appendix because they are bibliography lists.

B.1. Planning Issues

B.1.1. Air

Total Number of Comments: 2

Summary

The BLM must work within the Air Quality MOU as part of the RMP process. The signatories include the US Environmental Protection Agency, US Forest Service, National Park Service, US Fish and Wildlife Service, and BLM.

See Section 2.3.1.1, Air (p. 19)

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA, U.S. Department of Agriculture and U.S. Department of Interior entered into a "Memorandum of Understanding (MOU) Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the National Environmental Policy Act Process" on June 11 , 201 1. The parties to the MOU committed to using this tool to ensure effective and efficient NEPA air quality evaluations. We are eager to work with the BUM using this tool,

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

It will be appropriate to utilize the MOU's agency stakeholder process to share reasonably foreseeable development (RFD) and emissions inventory information and to determine appropriate steps for the air quality analysis, such as quantitative air quality modeling.

B.1.1.1. Air - Alternatives

Total Number of Comments: 3

Summary

The BLM should include a baseline air quality monitoring program that measures Hazardous Air Pollutants (such as acetaldehyde, benzene, ethyl benzene, ethylene glycol, and others), and includes selection of monitoring locations, a sampling schedule, and a definition of which constituents would be measured.

See Section 2.3.1.1, Air (p. 19)

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Baseline monitoring should also include measurement of Hazardous Air Pollutants typically associated with oil and gas operations. At a minimum, these include Acetaldehyde, Benzene, Ethyl benzene, Ethylene glycol, n-Hexane, Toluene, Xylenes (isomers and mixtures), o-Xylene, m-Xylene, p-Xylene. There may be other compounds depending on the types of activities that are anticipated under the future leases. These air pollutants have been found near communities and have been linked to oil and gas development as described in "Highly Elevated Atmospheric Levels of Volatile Organic Compounds in the Uintah Basin, Utah", EST, Helmig et al, 2014". ? The design of a sufficient monitoring program will require selection of the monitoring locations, the number of times samples will be collected, what constituents will be measured and other details. Park County requests the opportunity to provide input into the design of the baseline program and to review all drafts of the baseline air monitoring plan(s).

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

EPA recommends identifying and implementing an oil and gas surface occupancy buffer from occupied structures such as homes, schools and office buildings. The buffer or "setback" distance should be sufficient to minimize the potential for public health impacts associated with exposure to the following: near-field criteria pollutants and HAPs emissions; any other potential toxic emissions such as hydrogen sulfide releases; and emissions associated with well blowout or other explosive events. Setbacks can be an effective health protection tool because they provide an opportunity for emitted air pollutants to disperse before entering an area where they could be respired. They also provide extra time to warn residents of any unintended releases or emissions. We recommend the setback distances be informed by the following factors:1 . The relevant near-field modeling results for this RMP/EIS. We recommend the setback buffer ensures that people are not exposed to air pollution levels exceeding the NAAQS or other health based thresholds.2. Whether mitigation measures and BMPs are being required to reduce risks to nearby residents and other building occupants. Examples of risk reduction mitigation may include: requiring closed-loop drilling and completion; prohibiting reserve pits or produced water ponds; using lower emitting engine technology; capturing emissions from tanks, separators, and glycol dehydrators; and implementing stringent fugitive vapor controls.3. The composition of the planning area's oil and gas resource. For example, certain resource conditions may indicate the need for a larger setback buffer, including those with high HAPs content, higher explosive potential, or high sulfur or hydrogen sulfide content.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We understand the State of Colorado requires a minimum setback distance from residences of 500 feet. It is not clear whether the statewide minimum setback distance applies the factors above, or whether there are site specific factors that are relevant to this planning area. We therefore recommend this Draft RMP/EIS document whether the minimum setback distance is likely to be protective of residents in the planning area from an air quality perspective, and discuss the

factors (e.g., model results, required mitigation measures, resource composition) leading to that conclusion

B.1.1.2. Air - Baseline Affected Environment

Total Number of Comments: 7

Summary

The BLM should use the CARMMS analysis, rely on the most up-to-date air quality and meteorological data (including data on hazardous air pollutants, nitrous oxides, and volatile organic compounds) as the baseline information in the RMP/EIS. The BLM should complete a General Conformity report for nonattainment areas.

See Section 2.3.1.1, Air (p. 19)

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

We believe that the analyses completed in the Colorado Air Resources Management Modeling Study (CARMMS) will provide the basis for achieving the air analysis objectives of the MOU. We would like to work with BLM to discuss how these results are incorporated into the RMP, and in turn, how they will be used to make management decisions, including those related to air resource mitigation, within the scope of the RMP assessment. We would also like to discuss how the reasonably foreseeable development (RFD) scenarios developed for the RGFO fall within the scope of the development scenarios (high, medium, and low) incorporated into the CARMMS.The CARMMS assessment provides an opportunity for implementing principles outlined in Secretarial Order 3330 for Improving the Mitigation Policies and Practices of the Department of the Interior (October 31, 2013). Secretarial Order 3330 provides guiding principles for advancing a landscape level approach to improve mitigation associated with land use planning and permitting decisions governing energy infrastructure projects on the federal lands, including the impacts of adjacent special status areas like units of the National Park System impacts on ecosystem resources.

Organization1:Center for Biological

DiversityCommenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should rely on the most up-to-date information regarding the contribution of oil and gas operations to VOC and air toxics levels.Recent studies in Weld County show that existing emissions inventories likely underestimate the contribution of oil and gas operations to VOC levels by a factor of two.102 Further, researchers have found that existing emissions inventories vastly underestimate the contribution of oil and gas operations to hazardous air pollution concentrations in Weld County, suggesting that the health risk assessments conducted using these inventories are similarly inaccurate and therefore underestimate exposures and health risks.103 This study estimated benzene emission rates and other VOCs using air quality measurements taken from an airplane over Weld County. Current inventories estimating benzene emissions from oil and gas operators in the study area underestimated emissions by four to nine times. The study suggests that other hazardous air pollutants (such as toluene, ethylbenzene, ect.) could similarly be underestimated and that oil and gas sites could be a bigger source of benzene than vehicle emissions, previously thought to be the largest source in the area.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

As the General Conformity requirements apply in designated nonattainment areas, and maintenance areas, of which there are currently several in the planning area, the provisions of section 176(c)(4) of the CAA and 40 CFR part 93, Subpart B will apply. For example, we note that a portion of the Eastern Colorado RMP planning area includes the Metro-Denver/North Front Range 2008 8-hour Ozone NAAQS Nonattainment Area boundary.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

While not a part of the NEPA requirements that must be addressed in the Eastern Colorado RMP/EIS, please be advised that before a BLM approved or authorized "Federal action" can be conducted under the RMP/EIS, the CAA and EPA's General Conformity regulation require that the BLM conduct a general conformity analysis, and conformity determination as appropriate, for any project emissions from the activities in the planning area that will occur within the boundary of the Metro-Denver/North Front Range 8-hour Ozone Nonattainment Area and any other nonattainment or maintenance area. This requirement currently applies for the nonattainment area and will continue to apply should the State submit, and EPA approves, a redesignation request to attainment and maintenance plan for this area.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

we recommend that the Draft RMP/EIS include a discussion regarding the BLM'S plans to address the CAA Section 176(c)(4) and 40 CFR 93, Subpart B General Conformity requirements for emissions from BLM authorized activities that will occur within the boundary of the

Metro-Denver/North Front Range 8-hour Ozone Nonattainment Area. The discussion in the Draft RMP/EIS should present information regarding the applicable sections in 40 CFR 93 Subpart B. A key point of the discussion should present how an analysis would be conducted to evaluate if emissions from a Federal action will or will not exceed an applicable de minimis threshold level for the criteria pollutant of concern or its precursors: for example, this would be 100 tons per year for NOx or VOCs in the Metro-Denver/North Front Range 8-hour Ozone Nonattainment Area (see 40 CFR 93.153). This discussion should further note that if emissions from BLM-authorized activities in the MetroDenver/North Front Range 8 hour Ozone Nonattainment Area will exceed the 100 tons per year ozone precursor emissions de minimis threshold level for NOx or VOCs, then a full general conformity determination is required. In addition, we suggest noting that a federal agency may use a combination of the criteria listed in section 40 CFR 93.158 in order to demonstrate conformity to the SIP. We encourage the BLM to review EPA's General Conformity regulation, guidance documents, and training materials found at: http://www.epa.gov/air/genconform/index.html.The EPA has assisted other federal agencies in exploring options to address conformity and is available to discuss conformity options with you if that would be useful.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

we commend the BLM Colorado office for the current statewide air quality analysis collaboration underway on the Colorado Air Resources Management Modeling Study (CARMMS). We are interested in how the CARMMS information specific to the planning area will be presented in the Draft RMP/EIS

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

recent studies have increased awareness of concerns with the potential health impacts associated with HAPs emitted during oil and gas activities [1,2,3,4]. [1] McKenzie et al., Birth Outcomes and Maternal Residential Proximity to Natural Gas Development in Rural Colorado,Environmental Health Perspectives, April 2014.[2] Adgate et al., Potential Public Health Hazards, Exposures and Health Effects from Unconventional Natural GasDevelopment. EnvironmentalScience and Technology, 2014.[3] McKenzie et al., Human Health Risk Assessment of Air Emissions from Development of Unconventional Natural GasResources. Sci Total Environ 424:79-87.[4] Paulik et al., Impact of Natural Gas Extraction on PAH Levels in Ambient Air, EnvironmentalScience and Technology, 2015

B.1.1.3. Air - Impacts

Total Number of Comments: 11

Summary

The BLM should address all impacts of oil and gas development on air resources, including impacts related to development activities and continued use of fossil fuels. The BLM should

study the effects specifically caused by hydraulic fracturing (fracking) actions, releasing methane emissions, and generating volatile organic compounds, and ozone. The EIS should also study the effects on air quality related values from oil/gas development. The BLM should include in the analysis a discussion of a comprehensive air resources protection plan and how it could protect air resources.

See Section 2.3.1.1, Air (p. 19)

Commenter1:Fisher

Comment Excerpt Text:

Several weeks ago I met with a team of atmospheric scientists studying the emission of air pollutants from fracking sites North of Denver. Their conclusions imply that thousands of households are living with levels of carcinogenic pollutants many times higher than the legal limits at ALL times, as the result of oil extraction activities in this suburban area. How anyone can consider that this is a price worth paying I am not sure. Imagine knowing that simply by choosing to live in your hometown, that you were elevating your risks of cancer and neural defects every day that you chose to stay.

Commenter1:Constance Steeples

Comment Excerpt Text:

I have seen the air pollution caused by fracking- please keep fracking away from our public lands.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Oil and gas exploration and full scale production has potential to negatively impact air quality through escaping gases, including methane. This potential should be defined in the BLM study plan along with monitoring requirements.

Commenter1:Ruth Leuchte

Comment Excerpt Text:

Fracking creates continuous escaping methane from the ground near their sites, creating VOCs and an increase in ozone and all the associated health consequences that go along with increased air pollution.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

BLM should use air modeling to understand what areas and communities will most likely be affected by air pollution. It is crucial to gather independent data rather than relying on industry estimates, which may be inaccurate or biased. Wind and weather patterns, and atmospheric chemistry, determine the fate and transport of air pollution over a region, over time. The EIS should be informed by air modeling to show where the air pollution will flow.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Air quality monitoring is needed to support such an analysis and to identify and evaluate mitigation alternatives in the RMP. The scope of the air quality assessment should include the Clean Air Act criteria pollutants, hazardous air pollutants associated with any potential projects and greenhouse gases. Park County recommends baseline air quality monitoring to characterize the current levels of the Clean Air Act "criteria pollutants" including ozone, particulate matter (PM 10 and PM 2.5), carbon monoxide, nitrogen oxides, sulfur oxides, and lead. The measured levels should be compared to the National Ambient Air Quality Standards to assess the current baseline air quality

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We recommend that the Draft RMP/EIS consider and disclose the potential environmental effects of oil and gas development on air quality in the planning area, and determine whether there is a need to revise management actions or develop stipulations to minimize the potential air quality impact of oil and gas development.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

It also will be helpful to understand whether other modeling platforms, such as the 3-State Air Quality Study, will be utilized in this effort.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

the EPA recommends that the Draft RMP/EIS include an evaluation of the current air quality conditions and trends as well as the direct, indirect, and cumulative impacts from potential activities for:

Each of the criteria pollutants and their appropriate National Ambient Air Quality Standards (NAAQS), i.e., ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead;

AQRVs in potentially impacted Class I areas and sensitive Class IIareas;

Prevention of Significant Deterioration increment at potentially impacted Class I and Sensitive Class IIAreas; and

HAPs and relevant health-based risk thresholds for HAPs including acetaldehyde, benzene, ethyl benzene, ethylene glycol, formaldehyde, methanol, n-hexane, toluene, xylene (mixture), and any other compounds that the BLM identifies as potential hazardous air pollutants in the planning area.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

the planning area encompasses a region that has experienced extensive human settlement -- as well as industrial agricultural and energy development -- over the last century, all of which have contributed to diminished air quality, and risks to human and ecosystem health, water quality and wildlife. Within this context, the RMP should carefully and conservatively account for the additional potential impacts to air quality and air quality related values (AQRVs) presented by any level of expanded oil and gas development in the region, but especially in the absence of appropriate associated monitoring and mitigation measures.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

NPCA strongly encourages RGFO not to rely exclusively on the guidance put forth in the CARPP in protecting air quality and AQRVs, especially considering that the planning area encompasses several areas already or endangered of being in exceedance of NAAQS standards, including Rocky Mountain National Park, which falls within the Denver-Boulder-Greeley ozone non-attainment area. (Ozone levels at Rocky Mountain frequently register above the federal recommended eight-hour maximum level of 75 ppb.) Numerous studies have linked oil and gas drilling and production to volatile organic compound pollution and nitrogen oxides, which combine in the presence of sunshine to produce ozone, which is harmful to human health.

AQRVs are also impacted by activities within the planning area. Atmospheric deposition of nitrogen and sulfur have also been shown to impact sensitive terrestrial and aquatic ecosystems and vegetation within Rocky Mountain National Park as well as Great Sand Dunes National Park & Preserve, adjacent to the planning area.4 An NPCA report based on NPS and EPA data recently gave both of these parks “D” grades in the healthy air quality, which evaluated dangerous pollutant levels from the EPA’s Air Quality Index from 2008-2012.5 Ultimately, the BLM bears responsibility for ensuring that air pollutant are not further deteriorated by federal

oil and gas decisions, which implies that air quality targets and mitigation measures need to be defined in advance.

B.1.1.4. Air - Mitigation Measures

Total Number of Comments: 5

Summary

The BLM should include mitigation measures that would require fugitive dust control during oil and gas construction and operations, vapor recovery requirements to prevent methane emissions releases, and ongoing air quality monitoring after oil/gas operations begin in an area.

See Section 2.3.1.1, Air (p. 19)

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Fugitive Dust control is critical in the semi-arid South Park environment. Fine-grained sedimentary formations within the basin can be a serious source of dust if proper BMPs are not implemented. Require dust mitigation during construction, for vehicle traffic on unpaved roads, and ongoing operations.

Park County will require the use of speed restrictions and road maintenance in compliance with the Park County Standard Specifications for Road and Bridge Construction at:

http://www.parkco.us/DocumentCenter/Home/View/544

Vapor Recovery Units should be required on oil, condensate, and produced water storage tanks to reduce fugitive VOCs and recovery of BTU-rich vapors. Vapor recovery can capture up to 95% of hydrocarbon vapors from tanks, these vapors may be more valuable than natural gas and may offset the cost of installation.2

Glycol tanks should be evaluated for optimized circulation and flash tank separators should be installed to capture methane emissions.

Park County recommends proper installation and maintenance of valves and vent seals as well as replacement of wet seals with dry seals in centrifugal compressors where applicable.

During all phases of drilling, construction, and development Park County recommends a direct inspection and maintenance program that can identify and cost-effectively fix fugitive gas leaks.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County recommends that the Draft EIS include a commitment to continue monitoring air quality as future operations begin and expand in order to evaluate cumulative impacts. The

purpose of this additional monitoring will be to identify likely sources in the event that adverse impacts to air quality are measured during operations. Funding options should be explored.

Air quality mitigation required by Park County regulations includes: a requirement for closed loop systems, enclosed tanks, no open pits, and green completions. Well effluent must be directed to tanks, no pits will be permitted. Per the COGCC definition, green completion practices are those intended to reduce emissions of salable gas and condensate vapors during cleanout and flowback operations prior to the well being placed on production.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The design of a sufficient monitoring program will require selection of the monitoring locations, the number of times samples will be collected, what constituents will be measured and other details. Park County requests the opportunity to provide input into the design of the baseline program and to review all drafts of the baseline air monitoring plan(s).

Park County recommends that the Draft EIS include a commitment to continue monitoring air quality as future projects begin and expand in order to evaluate cumulative impacts. The purpose of this additional monitoring will be to identify likely sources in the event that adverse impacts to air quality are measured during operations.Funding options should be explored.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Fugitive Dust control is critical in the semi-arid South Park environment. Fine-grained sedimentary formations within the basin can be a significant source of dust if proper BMPs are not implemented. Require dust mitigation during construction, for vehicle traffic on unpaved roads, and ongoing operations.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA recommends that the BLM identify in the Draft RMP/EIS the mitigation measures (including control measures and design features) it would apply at the project level in the event that potential adverse impacts to air quality or AQRVs on affected lands are predicted. These measures could include equipment type or design requirements, emission standards or limitations, best management practices (BMPs), dust suppression measures for unpaved roads and construction areas, add on control technologies, and limitations on the density and/or pace of development. The EPA also recommends that the BLM identify the regulatory mechanisms it will use to ensure implementation of these measures including lease stipulations, conditions of approval, and notices to lessees.

B.1.2. Climate Change

B.1.2.1. Climate Change - Alternatives

Total Number of Comments: 13

Summary

The RMP alternatives should include measures, actions, and strategies that incorporate climate change resiliency and adaptation, including actions that avoid, reduce, and ameliorate the direct, indirect, and cumulative effects of climate change on resources and transformation-oriented strategies that aim to increase adaptive capacity of the ecosystems (e.g., modeling to predict future occurrences of target species and/or habitat, restoring wetland habitats, and moving species outside of their historic range). Other measures could include measuring and monitoring for land health and resiliency, such as applying Fundamentals of Rangeland Health to all programs and activities to evaluate the effectiveness of management actions and identify climate-related stressors such as drought, flood, fire, and weed infestations. The BLM should not include actions in the RMP alternatives that result in negative aspects of climate change.

See Section 2.3.1.2, Climate Change (p. 19)

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

We recommend that BLM include the latest literature review and actual project implementation activities that are being implemented for increased protection measures against the various elements of climate change. It is important to consider the larger landscape approach in discussing the cumulative effect of climate change and the need to reduce other stressors – like impacts from land use allocations – that contribute to immediate and long-term impacts.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

BLM should incorporate climate change resiliency and adaptation into the following elements of the management planning process:

- Pre-planning assessments, including the projected effects of climate change on the conservation of ecosystems and special status species
- Goals and objectives for ecosystem and wildlife conservation within the planning area.
- A range of management alternatives that consider actions to avoid, reduce, and/or otherwise ameliorate the direct, indirect, and cumulative effects of climate change.
- Management prescriptions and mitigation measures that are durable and resilient to the impacts of climate change.

- Analysis of environmental consequences of planned decisions.
- Monitoring.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The BLM can bolster its approach to planning for climate change by adopting standards for managing, measuring and monitoring for land health and resiliency. For example, the agency should apply BLM Fundamentals of Rangeland Health (43 C.F.R. § 4180.1) to all programs and activities in order to evaluate the effectiveness of management actions to sustain and restore ecological processes, including soil, hydrologic and biotic processes. Integrating land health fundamentals into planning will help the BLM to better understand and respond to the effects of multiple landscape-scale change agents, including climate-related stressors such as drought, flood, fire, and pest and weed infestations, as well as factors related to changing development patterns and disturbance due to a wide array of land uses.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Resistance-oriented strategies that aim to reduce the exposure of the species or habitat to climate-related stresses. For instance, in the face of higher temperatures it may possible to reduce the exposure experienced by the target, by restoring riparian cover to minimize changes in stream temperatures or shading sea turtle nests to reduce incubation temperatures. This might also involve giving extra conservation attention to likely climate "refugia," or areas likely to experience less change than the surrounding landscape (springs fed by cold groundwater, north-facing slopes, etc.) It may also be possible to reduce the exposure experienced by the species or habitat, by ameliorating a non-climate threat that generates the same ecological consequence as a climate factor. The adaptation strategy should specify how it will address the ecological consequence generated by the climate factor. For example, in a stream system, both dams and decreased snow pack might alter the hydrology of the system and decrease stream flow. An adaptation strategy could include timed releases during the low flow periods caused by decreased snow pack and early melting.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Resilience-oriented strategies that aim to reduce the sensitivity of the species or habitat, improving its ability to "bounce back" from a climate-related stress. Many of these strategies will include habitat protection, restoration, management and other activities that improve the overall health of the system, for instance to reduce the likelihood of catastrophic fire, improve wetland function, alleviate competition from invasive species, add artificial nest boxes to boost reproductive activity, etc. Resilience-oriented strategies may also aim to reduce the conservation

target's sensitivity to the climate factor, by including more climate-tolerant ecotypes or species in habitat restoration efforts

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Transformation-oriented strategies that aim to increase the adaptive capacity of the system by allowing it to respond in new ways. These might include increasing connectivity to allow species to shift their ranges, or proactively conserving areas that are modeled to be likely future occurrences of the target species or habitat. Facilitating the transition of a freshwater wetland to a saltmarsh, while restoring additional freshwater wetland farther inland, is an example of a transformation strategy for sea level rise. More aggressive transformation strategies, like actually moving species to areas outside of their historic range, are considered more controversial and require careful consideration

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

The BLM must address the impacts of climate change in the RMP. Climate change must be considered as part of every decision, and the agency should not approve decisions that contribute to the negative aspects of climate change.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Another source of information for impacts from climate change is BLM's rapid ecoregional assessment (REA) for the Southern Great Plains, which covers part of the planning area.[41] Even if only partially complete, BLM should be using the information it does have from the REA to inform the RMP/EIS and to address management issues at the landscape-scale, such as climate change. See, BLM IM 2014-125, Attachment 1.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should analyze impacts to climate change from fugitive dust emissions that would result from recreation activities authorized under this RMP and adopt a final RMP that minimizes and/or mitigates those impacts.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The impacts of climate change should be a major factor in every alternative that is created since it is an undeniable reality that will drive all land use planning decisions.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The RMP provides BLM with an excellent opportunity to analyze the impacts from climate change to the planning area over the next two decades, as well as the contribution to climate change from management decisions made in the plan. This analysis should lead to the development of thoughtful management prescriptions and alternatives in the land use plan that will address how BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Although there is no widely-accepted method of assessing and managing risk, we recommend breaking risk down into its component parts—vulnerability, exposure, and uncertainty—as a useful way to think about risk to biodiversity and productive potential. In the TWS report, "Recommended Risk Assessment and Management Approach for Addressing Climate Change in BLM Land Use Planning" (included as Attachment A.16), we recommend an approach for assessing risk in the planning area as well as an approach for management of that risk for BLM to comply with its legal obligations under NEPA and FLPMA as set out above.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

As discussed previously in our comments on Planning 2.0, we recommend using an experimental, adaptive design known as the "portfolio approach" of management strategies (as set forth in Belote et al. 2014) in the RMP. As stated by Belote et al., "[u]ncertainty about how ecosystems and species will respond to co-occurring, interactive, and synergistic impacts of the Anthropocene precludes our ability to know which strategy will best sustain wildland values in to the future." Thus, Belote et al. concludes that land managers should use an experimental zoning approach for managing certain lands that include the following zones as management strategies:

- Restoration Zones: areas that are devoted to forestalling change through the process of ecological restoration;
- Innovation Zones: areas that are devoted to innovative management that anticipates climate change and guides ecological change to prepare for it; and
- Observation Zones: areas that are left to change on their own time to serve as scientific "controls" and to hedge against the unintended consequences of active management elsewhere.

These strategies should be used in conjunction with each other in order to spread the risk among the different strategies and to allow for diverse outcomes to inform rapid learning about management strategies in the future. This is the kind of deliberate yet dynamic planning process that BLM should be fostering in RMPs.

B.1.2.2. Climate Change - Baseline Affected Environment

Total Number of Comments: 3

Summary

The BLM should use available climate data to get a more detailed picture of climate change vulnerability in species and habitats. Tools suggested include the Climate Change Vulnerability Index and System for Assessing Vulnerability of Species, both of which can inform the design and implementation of adaptive strategies.

See Section 2.3.1.2, Climate Change (p. 19)

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Available climate data can also be utilized in conjunction with species and habitat information in order to get a more detailed picture of climate change vulnerability. "Vulnerability" is a function of exposure to climate change – the magnitude, intensity and duration of the climate changes experienced, the sensitivity of the species or community to these changes, and the capacity of the system to adapt to these change. Multiple tools are available for assessing vulnerability, including the Climate Change Vulnerability Index (CCVI) and the System for Assessing Vulnerability of

Species (SAVS). These results can then inform the design and implementation of adaptation strategies to help conserve the resources in question over the long term.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Include in the "Affected Environment" section of the Draft RMP/EIS a summary discussion of climate change and ongoing and reasonably foreseeable climate change impacts relevant to the planning area, based on U.S. Global Change Research Program7 [[7] http://www.globalchange.gov/] assessments, to assist with identification of potential impacts that may be exacerbated by climate change and to inform consideration of measures to adapt to climate change impacts. Among other things, this will assist in identifying resilience-related changes to the proposal that should be considered.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

A hard look at impacts from fugitive dust is necessary in order to understand and disclose to the public the likely contributions to regional climate change caused by this plan. In September 2009, Dr. Jayne Belnap of the United States Geological Survey gave a presentation to the Colorado Water Conservancy District (included as Attachment A.14). Dr. Belnap's presentation addressed the connection between increased temperature, disturbance, invasive species and dust. This presentation focused much attention on the impacts from OHVs and noted the cycle of increasing temperatures, which increases dust, which is exacerbated by OHV use, which increases the effects of climate change (temperature increases), with the key indicator of these problems being earlier snowmelts. Of particular concern is the amount of dust that results from motorized routes, which settles upon snow pack and alters the melt rate which, in turn, alters the availability of warm season infusion of water into streams and lakes, when such water is critical to wildlife. For example, in 2005 and 2006, disturbed desert dust melted snow cover 18 to 35 days earlier in the San Juan Mountains. Painter et al. 2007. In 2009, disturbed desert dust melted snow cover 48 days earlier in the San Juans. Painter 2009.

Neff et al. (2008) found that "dust deposition onto snow cover in the western United States has recently been shown to accelerate melt and reduce snow-cover duration by approximately one month, a finding that has broad implications for water resources in mountainous regions of the United States" (citing Painter, T. H. et al. The impact of disturbed desert soils on duration of mountain snow cover. Geophys. Res. Lett. 24 (2007), included as Attachment A.15).

B.1.2.3. Climate Change - Impacts

Total Number of Comments: 6

Summary

Commenters were divided on whether the BLM should analyze climate change in the EIS. Some commenters suggested that the BLM consider the effects of continued fossil fuels use on climate change, as well as all effects that would result from climate changes, such as higher ambient temperatures, floods, fires, and ecosystem loss. Other commenters suggested that climate change is too speculative and the BLM should not analyze it.

See Section 2.3.1.2, Climate Change (p. 19)

Commenter1:Dorothea Leicher

Comment Excerpt Text:

Climate change is causing enough stresses on our ecosystems. We need to safeguard biodiversity when and where we can

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The combustion of extracted oil, gas, and coal will add vast amounts of carbon dioxide to the atmosphere, further heating the climate and moving the Earth closer to catastrophic and irreversible climate change. Though much of the oil is used as gasoline to fuel the transportation sector, the produced oil may also be used in other types of products. The EIS should study all end-uses as contributors to climate change.

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

c. CICA strongly discourages BLM from considering so-called “climate change” in its environmental analysis for the Eastern Colorado RMP. The idea that the climate has changed and is changing as the result of human actions is not by any means a proven fact. Accordingly, even considering it as part of the environmental analysis would be disingenuous.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We believe the Council on Environmental Quality's December 2014 revised draft guidance for Federal agencies' consideration of GHG emissions and climate change impacts in NEPA outlines a reasonable approach, and we recommend that the BLM use that draft guidance to help outline the framework for its analysis of these issues in the RMP/EIS.Accordingly, we recommend the Draft RMP/EIS include an estimate of the GHG emissions associated with reasonably foreseeable development in the planning area, qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce GHG emissions. More specifics on those elements are provided below. In addition, we recommend that the NEPA analysis address the appropriateness of considering changes to the design of the proposal to incorporate GHG reduction measures and resilience to foreseeable climate change. The Draft RMP/EIS should make clear whether commitments have been made to ensure implementation of design or other measures to reduce GHG emissions or to adapt to climate change impacts.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

"Environmental Consequences" Section

Estimate the GHG emissions associated with the proposal and its alternatives. Example tools for estimating and quantifying GHG emissions can be found on CEQ's NEPA.gov website8 [[8] https://ceq.doe.gov/current_developments/GHG_accounting_methods_7Jan2015.html]. For actions which are likely to have less than 25,000 metric tons of C02-e emissions/year, provide a qualitative estimate unless quantification is easily accomplished.

The estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the action area, as discussed in the "affected environment" section.

Recognizing that climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, we do not recommend comparing GHG emissions from a proposed action to global emissions. As noted by the CEQ revised draft guidance, "[t]his approach does not reveal anything beyond the nature of the climate change challenge itself: [t]he fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact." We also recommend that you do not compare GHG emissions to total U.S. emissions, as this approach does not provide meaningful information for a planning level analysis. Consider providing a frame of reference, such as an applicable Federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

Describe measures to reduce GHG emissions in the planning area, including reasonable alternatives or other practicable mitigation opportunities and disclose the estimated GHG reductions associated with such measures. The Draft RMP/EIS alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change

Organization1:

Commenter1:Evi Klett

Comment Excerpt Text:

Climate scientists tell us that 80% of fossil fuel reserves need to

stay in the ground in order to avoid catastrophic climate change. That

means that 4/5 of oil, gas, and coal reserves need to be left,

untouched, in the ground if we are going to have a biosphere that can

support life for our species and many others. To ignore those physical

and chemical limitations of our atmosphere is to condemn us to climate

disruption misery in the form of drought, fires, flooding,

environmental degradation, high temperatures, bad air quality, mass

human migration and ultimately extinction.

B.1.2.4. Climate Change - Mitigation Measures

Total Number of Comments: 1

Summary

The BLM should consider actions that would mitigate climate changes, such as identifying and conserving ecologically intact areas, conserving and restoring priority habitats, and maintaining and improving connectivity between these areas.

See Section 2.3.1.2, Climate Change (p. 19)

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The BLM should also mitigate for climate change impacts by identifying and conserving ecologically intact areas, conserving and restoring priority habitats (including the existing network of protected lands), and maintaining and improving connectivity between these areas. The new planning process represents a unique opportunity to prioritize the conservation of areas that currently sustain high levels of biological diversity, have been identified as potential climate change refugia, to connect these important habitats to allow for species movement, and to guide land use and development decisions away from these priority areas. Such a prioritization process would also support regional restoration strategies, including siting for off-site mitigation projects to support climate change objectives.

B.1.3. Noise

B.1.3.1. Noise - Alternatives

Total Number of Comments: 5

Summary

The BLM should designate areas for quiet use and should restrict motorized use to preserve quiet.

See Section 2.3.3.1, Noise (p. 30)

Commenter1:345263

Comment Excerpt Text:

Designate Quiet Use Areas. Preserve natural soundscapes, views, and quiet use/recreation. People, their pets, and communities benefit from these settings.

Identify priority areas for wildlife, natural resources, including natural quiet (as recognized and defined by NPS), ecological processes and restoration. This should be done prior to developing new areas.

Organization1:

Commenter1:Douglas Walter

Comment Excerpt Text:

Allterrain vehicles should not be permitted within earshot of population centers, existing homes or trails used by hikers, horseback riders and bicycle riders.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

We have proposed “Quiet Use Areas” or “Quiet Use Zone” designations to public land management agencies for the last 16 years. These are places on public lands valued and favored by quiet recreationists, with restrictions on noise producing activities that would result in conflict.

We are proposing two such area designations in this plan. Please see the Quiet Use Zones attachment. One adjacent to the City of Salida and another adjacent to the City of Buena Vista.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should utilize acoustic modeling to analyze and preserve natural soundscapes, especially in special management areas managed for quiet use recreation. The Wilderness Society has developed a GISbased model based on The System for the Prediction of Acoustic Detectability (SPreAD; Harrison et al. 1980), which is a tool that was developed nearly 30 years ago by the USFS and EPA to predict the acoustic impacts of recreational activity in wildland settings. SPreAD was originally developed as a system of worksheets and tables, where the user could enter information about the sound source and environment and manually calculate noise propagation from a single point source to a single point receiver. TWS adapted the SPreAD model to ArcGIS, automating the hand calculation method to predict the propagation of noise for all directions throughout the area of interest.

SPreAD-GIS can be used to 1) determine the areas within a planning unit where the natural soundscape is predominant and protect that setting through recreation planning; and 2) model sound propagation from uses such as motorized vehicles in a proposed quiet-use recreation area to determine what planning decisions, such as route closures, could restore and enhance the natural soundscape. In this way, BLM could ensure that travel and recreation planning decisions provide opportunities for experiencing naturalness and solitude. There are other models and methodologies available, but we highlight SPreAD-GIS because it is available by request from TWS.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We recommend BLM manage sound resources on the public lands similar to visual resources, with a classification gradient ranging from most protective of natural soundscapes to allowing significant impacts to the soundscape. This would provide for areas where maintaining the natural soundscape is prioritized to benefit recreation, wildlife, wilderness and other natural values on the public lands. It would also assist the agency with managing activities that impact sound resources by clearly defining where and how those impacts may occur.

The following classes provide an example of a possible approach for inventorying and managing sound resources in landscape-level planning:

- Class I Objective: The objective of this class is to preserve the natural soundscape. This class would be appropriate for lands managed to preserve wilderness characteristics, promote primitive recreation experiences, and protect wildlife habitat and ecological systems. The level of change to the characteristic soundscape should be very low and must not attract attention.

- Class II Objective: The objective of this class is to retain the natural soundscape such that noticeable impacts are infrequent and isolated instances. The level of change to the natural soundscape should be low. Management activities may be heard on occasion, such as a passing motorized vehicle, but should not detract from the experience of the natural landscape.

- Class III Objective: The objective of this class is to partially retain the natural soundscape where practicable. Management activities may attract attention but should not dominate the auditory experience of the casual observer. This class would be appropriate for front country recreation areas or other areas where natural soundscapes are not critical to the experience being sought out by visitors.

- Class IV Objective: The objective of this class is to provide for management activities which require significant impacts to the natural soundscape, including highly impactful events or impacts sustained over the long term. These management activities may dominate the sound of the landscape and may be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating basic elements.

These potential management objectives for sound resource classes are similar to the BLM Manual for Visual Resource Classes (BLM Manual 8400). Likewise, planning areas could be delineated into sound quality rating units for management purposes. Considerations on rating sound resources, such as landform, vegetation, and scarcity, are among the factors that could logically be incorporated into baseline data and management objectives for auditory resources. Acoustic modeling would be an important component of assessing sound quality rating units.

B.1.3.2. Noise - Baseline Affected Environment

Total Number of Comments: 6

Summary

Commenters emphasized that natural quiet is highly valued. Quantification should be used to analyze the natural soundscape noise levels. OHV traffic volume should be considered in the analysis.

See Section 2.3.3.1, Noise (p. 30)

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Natural Soundscapes. Natural soundscape is a defining element of the NPS units and related areas, and an intrinsic natural resource. The low ambient sound level in these areas is something visitors value highly as part of their recreational experience .

Organization1:

Commenter1:Heike Momiyama

Comment Excerpt Text:

Less impact on noise – noise studies should be carried out for either scenario similar to what has been done by the BLM in other states.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Noise has been shown to be a significant stressor to wildlife and people and noise negatively impacts fitness and health. Noise originating from public lands decreases nearby property values according to one study conducted within the overall RMP area (see Noise file which is attached).

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Like viewsheds and air quality, sound is one of the resources on the public lands that is affected by agency-authorized uses and can impact other resources as well, such as recreation and wildlife. BLM has a statutory obligation to manage the public lands "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition." 43 U.S.C. § 1701(8). To fulfill this mandate, it is important for BLM to consider natural soundscapes in order to give meaningful effect to this provision, especially on those lands which are to be managed in their "natural condition," including Wilderness Study Areas and Lands with Wilderness Characteristics.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Furthermore, the authors of the CSU study note that "tranquility" and "solitude" are explicitly addressed in the Wilderness Act as values that must be preserved by land management agencies. BLM guidance directs the preservation of "naturalness" in Wilderness Study Areas, Visual Resource Management I zones, and other areas managed to protect wilderness qualities. All of these values are negatively impacted when the natural soundscape is impacted; therefore, BLM must retain the natural soundscape in wilderness-quality lands and primitive recreation areas. As supported by the U.S. Geological Survey, dissatisfaction with recreational opportunities can "diminish public support for land-management programs." Ouren 2007.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Soundscapes are also important to managing wildlife resources. Environmental noise can affect the physiology, behavior, and spatial distribution of wildlife. While the particular impacts vary by species and habitat, studies have shown that transportation-based and other human-caused noise can impact species in ways crucial to survival and reproductive success. Havlick 2002; Ouren et al. 2007; Knight and Gutwiller 1995.

B.1.3.3. Noise - Impacts

Total Number of Comments: 10

Summary

Noise from OHVs is an issue and should be monitored. Noise should be considered a distinct resource. Noise from adjacent uses should be limited.

See Section 2.3.3.1, Noise (p. 30)

Commenter1:Douglas Walter

Comment Excerpt Text:

allterrain vehicles have two major effects. They are extremely noisy and they drastically damage the land. The noise is abusive, and is unfair to other quiet users of the land, such as hikers and horse riders

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

The BLM should acknowledge the sound resource on the public lands and address the soundscape as a separate resource that must be analyzed. It is very important for the BLM to consider natural soundscapes on lands such as Wilderness Study Areas of Lands with Wilderness Characteristics.

BLM should commit to monitoring the WSAs for unauthorized recreation access and adopt appropriate enforcement measures as necessary.

Commenter1:Tim Kelly

Comment Excerpt Text:

6) Noise from OHVs is already an issue to residences located near to the roads (FR367A) in the planning area.

Commenter1:Heike Momiyama

Comment Excerpt Text:

I am surprised that there is no mention of noise issues relating to OHV. Perhaps this comes at a later stage in the process. There have been many studies including some commissioned by the BLM to measure and understand OHV noise. Obviously some land characteristics dampen noise and others amplify noise. We have many BLM areas that consist of beautiful/tranquil canyon terrain. Studies in other areas have shown that canyons significantly amplify noise. Any proposed

new trails for OHV use should undergo a noise study and particularly for areas that are prime examples of noise amplification such as canyons. This sort of noise will have a severe negative impact on wildlife, other recreational users and nearby land owner. This is a critical issue and needs to be supported through scientific study/measurement/analysis.

Organization1:

Commenter1:John O'Toole

Comment Excerpt Text:

As part of effectively preserving the natural soundscape in quiet recreation areas, the BLM should quantitatively measure both: (1) the decibel (dB) levels of the natural soundscape; and (2) ORV dB levels on the natural soundscape. Quantification of anticipated ORV traffic volume, duration, and frequency are thus necessary components of soundscape analysis.

There are many tools available to the BLM to adequately measure noise impacts and set prescriptions to prevent negative impacts. An example is a GIS model based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to "evaluate potential... acoustic impacts when planning the multiple uses of an area. " The SPreAD model has been adapted to GIS environment so that potential noise impacts could be integrated with other variables being considered in the planning process (SPreADGIS). The SPreADGIS model was developed for the Forest Service, but its applicability extends seamlessly to BLM lands, as the inputs include vegetation and topography.

Commenter1:John O'Toole

Comment Excerpt Text:

My family's enjoyment of BLM lands is incompatible with ORV noise. We hike and camp for the natural environment. The sound of motorcycles or ATVs markedly diminishes our experience of nature.

In our experience, the sound of ORVs penetrates for miles. We therefore think it is essential that planning for possible expansion of ORV use include a comprehensive soundscape analysis.

Commenter1:John O'Toole

Comment Excerpt Text:

The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The USGS finds that dissatisfaction with recreational opportunities can "diminish public support for land management programs" (Douglas xiii). We encourage BLM to utilize conduct rigorous evaluation of the impact of OHV noise using tools such as SPreADGIS model as part of its overall planning when considering expansion of OHV access.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

There are many activities that occur on BLM land that create noise and negatively impact the natural soundscape. Recreational shooting, OHV use, and the operation of chainsaws or other machinery for fuelwood gathering or fuel treatments have and can caused conflicts with desired experiences of quiet recreationists, adjacent land owners and other forest visitors. The BLM must consider and addressthese conflicts in this plan.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Unregulated and unmanaged dispersed motorized camping is having significant negative impacts on soils, resources, wildlife, vegetation and forage for wildlife and cattle and travel/trans portation networks.

Campers are pioneering new routes and expanding/extending new routes in certain areas. The BLM must consider the impacts of allowing dispersed motorized camping to occur off designated and existing routes in this RMP, and develop recommendations for managing this use.

Commenter1:Kristin Skoog

Comment Excerpt Text:

Sound pollution from commercial and military uses of BLM land and nearby airspace should be strictly limited

B.1.4. Water

B.1.4.1. Water - Alternatives

Total Number of Comments: 19

Summary

Comprehensive background water quality data and effective monitoring are imperative to analyzing impacts on water quality. The RMP should analyze impacts on water quality and describe mitigation measures and BMPs that would protect water quality and habitat, particularly from mining, energy development, and oil and gas extraction. BMPs should include requiring a monitoring plan for surface-disturbing activities. Commenters recommended setbacks (NSOs) from important water resources, including wetlands, fens, playas, riparian areas, streams, impaired waters, and designated source water protection zones, and for ACECs with important water resources. Commenters provided specific setback distances for different types of water resources and asked that the BLM consider the direction provided in local and regional water plans.

See Section 2.3.1.3, Water (p. 20)

Commenter1:Eddie Kockman

Comment Excerpt Text:

However, it has become clear that with both oil/gas production, as well as uranium mining, background water quality data and effective monitoring is imperative.

Commenter1:Verne Huser

Comment Excerpt Text:

As a longtime river runner who has run the Arkansas, I would like to see the river corridor protected, not only for the freeflowing river itself but for the fauna and flora along its banks and its value as a wildlife corridor.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends that existing water quality within the boundaries of the ECRMP should be preserved or improved wherever possible and to the extent possible, particularly as it relates to energy development leaks, spills, and t racking.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Development of site-specific Best Management Practices (BMP) to ensure nondegradation of habitat and water quality.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Implement a half-mile NSO buffer stipulation from the Water Influence Zone (WIZ) around any existing or potential (expansion) cutthroat trout streams, lakes and reservoirs.

Organization1:City of Aurora

Commenter1:Marshall Brown

Comment Excerpt Text:

Aurora Water encourages the use of setbacks from waterways and riparian areas and the use of "No Surface Occupancy" designations in sensitive areas.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Additional conservation practices that BLM could include in the RMP are:

- Assistance with funding for lessees to apply the BMPs below
- Encourage installation of alternative drinking water sources to reduce impacts to riparian areas;
- Use of exclusionary practices to protect sensitive source water areas
- Monitoring to assess effectiveness of range improvements in protecting aquaticresources; and
- Enhanced monitoring of resource conditions adjacent to high value water resources.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The RMP should analyze potential impacts to surface water and groundwater quality from proposed projects. Mitigation to minimize impacts should be required.

The RMP should require that future projects such as uranium mining that could impact water include a water resource monitoring plan for surface water and ground water (water levels and water quality, before, during and after any project). This should include baseline and long-term monitoring for private wells.

The RMP should require a water management plan that details the sources and quantities of fresh water required for any projects. This should include:

- Anticipated water demand for the project.
- Sources of water for the project (surface water or ground water).
- Potential impacts of water withdrawals (e.g., drawdown of aquifer water levels, impact on water supply wells, reductions to instream flow, impacts on aquatic life, wetlands and other aquatic resources).

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

To protect these rare resources, Park County recommends a general 500-footsetback (NSO stipulation) for wetlands in addition to mineral withdrawal for rare fens noted in the withdrawal section of this document. Park County recommends that the RMP present inventories and maps of existing wetlands and waters of the U.S. The inventory should include information on acreages and channel lengths, habitat types, conditions and functions of these waters. Recent Colorado Natural Heritage Program (CNHP) mapping will be an important part of this inventory. Contact CNHP for the most up to date maps.

Park County recommends updating existing stipulation CO-28. This is a CSU stipulation to protect perennial water impoundments and streams, and/or riparian/wetland vegetation by moving oil and gas exploration and development beyond the riparian vegetation zone. This stipulation should be applicable to all projects, not only oil and gas, and updated to the 500-foot NSO recommended previously in this letter for protection of streams, riparian and wetland areas.

Park County supports the use of existing stipulation RG-18 (NSO to protect fen resources, South Park Plan amendment), with potential modifications based on cooperating agency discussions. This stipulation should be applicable to allprojects, not only oil and gas drilling

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

As presented previously, a ½-mile NSO stipulation should be used (with no waivers, exceptions or modifications) for Gold Medal rivers/streams and reservoirs, including Spinney Mountain Reservoir.

As presented previously a 500-foot NSO stipulation with no waivers, exceptions or modifications should be used for all water bodies

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

BLM has participated in multiple local planning efforts based on the Colorado Department of Public Health and Environment assessment and protection planning for source water areas. The overlay of source water areas should be used to establish BLM statewide policy for identifying lands that are open or administratively unavailable for certain uses, establish restrictions, and provide comprehensive management direction that protects watershed health and water supplies.

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

The protection of water rights in the Arkansas River Basin is essential for meeting the water supply needs of municipalities, industries, farmers and ranchers within this over appropriated basin. The BLM should avoid changes to its management policies and practices that could interrupt water rights operations, and to the extentpractical, the RMP should be consistent with water plans of State and local governments, including the 2015 Colorado Water Plan that is to be submitted to the Governor by December 10th, 2015 and the Arkansas River Basin Implementation Plan.

Organization1:Denver City Council

Commenter1:Jack Paterson

Comment Excerpt Text:

Any South Park Master Leasing Plan must protect waters through tools such as clear and strong setbacks from rivers and drinking water reservoirs, best management practices and strong surface and groundwater protections for the watershed.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Where a Total Maximum Daily Load (TMDL) exists for impaired waters in the area of potential impacts, we recommend that pollutant loads comply with the TMDL allocations for point and nonpoint sources. Where new loads or changes in the relationships between point and nonpoint source loads are created, we recommend that the BLM work with CDPHE to revise TMDL documents and develop new allocation scenarios that ensure attainment of water quality standards.

Where TMDL analyses for impaired water bodies within, or downstream of, the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Contaminants from surface events such as spills, pit and pipeline leaks, and nonpoint source runoff from surface disturbance have the potential to enter and impact surface water resources if these events occur in close proximity to water bodies. If surface activities are set back from the immediate vicinity of surface water, wetlands, and designated source water protection zones, this provides an opportunity for accidental releases to be detected and remediated before impacts reach water resources. If accidental releases are not detected, the setback provides a safety factor and some possibility of natural attenuation occurring. Setbacks also help prevent nonpoint source pollutants such as sediments from impacting surface waters.

Accordingly, the EPA recommends that the BUM evaluate setback distances identified through leasing stipulations such as NSO for perennial waters including lakes and reservoirs, intermittent and ephemeral streams, steep slopes, and impaired waters within the planning area. The EPA recommends the following minimum NSO setbacks:

Minimum 100 foot NSO setback from slopes greater than 30%;

Minimum 500 foot NSO setback for flowing waters (rivers and streams) or 100-year floodplain, whichever is greater;

Minimum 500 foot NSO setback for lakes, ponds and reservoirs, wetland and riparian areas and springs;

Minimum 750 foot NSO setback for 303(d) Impaired waters;

Minimum 1,000 foot NSO setback for special or significant waters; and

Minimum 100 foot NSO setback for intermittent and ephemeral streams.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

In addition, we recommend the BLM consider a designation of NSO within Areas of Critical Environmental Concern (ACEC), or other valued areas where important water resources may be impacted, for example the exceptional fisheries and gold medal waters present in the Upper South Platte Watershed.

Organization1:

Commenter1:Emil McCain

Comment Excerpt Text:

Dike walls scattered throughout Huerfano County should be Allocated as offlimits to gas and oil drilling. The unique dikes in the La Veta area and the Spanish Peaks Wilderness are not the only dikes in the county. They are scattered all over the Huerfano Valley to the north as well. Volcanic cones are visible in numerous places. In addition there are dikes and cones underground. Huerfano County has been suffering from a drought, and it is an area that values its water above all. These dikes and cones are all places that can permit fracking fluids to be transmitted into the nearby water table when oil and gas or hard rock mineral mining development occurs.

Commenter1:Deb Overn

Comment Excerpt Text:

I am a Denver resident, so some of my drinking water comes from the South Platte River in South Park. I ask the BLM to protect my drinking water through common-sense management and regulation through the MLP.

Organization1:GPAA/Public Lands for the People

Commenter1:Garry Vaughn

Comment Excerpt Text:

Water- Allow dredging to clean up creeks

B.1.4.2. Water - Baseline Affected Environment

Total Number of Comments: 30

Summary

Data from the 2011 Park County Groundwater and Surface Water Monitoring Project, the USGS, and the water quality study for the South Park will be important for the RMP. A comprehensive inventory of all water resources and aquifers within and adjacent to BLM lands and each one's water quality must be used to thoroughly classify existing and potential drinking water resources in the planning area. Many commenters provided lists of topics that should be covered in the inventory. Protecting water resources in South Park and the South Platte Watershed is important because it is the source of most of the drinking water in the Denver Metro Area; provides unique wildlife habitat, minerals, and rare plants; provides for tourism, agriculture, air quality, and fisheries; and supports the economy. The RMP should describe how water demand from extraction operations depletes and can damage groundwater and surface water.

See Section 2.3.1.3, Water (p. 20)

Commenter1:Eddie Kockman

Comment Excerpt Text:

Certain BLM lands are in close proximity to surface waters including flowing rivers, springs and reservoirs including Antero, Spinney and 11-Mile Reservoir, all of which are sources of water for the Metro area. In addition there are thousands of wells used for household and domestic use, which are also in proximity to BLM, as well as lands administered by the Colorado State Board of Land Commissioners. Riparian areas, wetlands, and lakes are also sensitive areas.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Data contained in the 2011 Park County Groundwater and Surface Water Monitoring Project will be important in completion of both a revised RMP and MLP for Park County. Data also exists from past analysis of the U.S. Geological Survey that should be summarized.

Commenter1:Eddie Kockman

Comment Excerpt Text:

A summary of the current data is available related to water quality (surface, shallow and deep aquifers) throughout Park County. The data is not conclusive, but does indicate areas of concern. One example is the levels of radioactivity in waters that originates from the extensive levels of uranium in portions of Park County.

Commenter1:Eddie Kockman

Comment Excerpt Text:

The 2011 Groundwater and Surface Water Monitoring Report funded by Park County and completed by the Coalition for the Upper South Platte (CUSP) provides important data for including into both a MLP and RMP. In the future additional levels of such analysis need to be completed, especially in relation to deep level aquifers and potential for contamination.

Commenter1:Eddie Kockman

Comment Excerpt Text:

The ongoing Water Assessment and Water Protection Plan project being undertaken by Denver Water and supported with funding from the Colorado Department of Public Health and Environment is an outstanding effort to protect water quality in the upper South Platte watershed.Park County supports this effort and CUSP is responsible for implementing the stakeholder input. Data and public input from this process should be of value in completion of both a MLP revision of the RMP.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Recent efforts to complete an updated map of water resources in Park County, which will be used in the Colorado Water Plan, will also provide important data for used in a RMP revision and completion of a MLP.

Commenter1:Eddie Kockman

Comment Excerpt Text:

To further support the importance of protecting surface waters and aquifers the Colorado Oil & Gas Conservation Commission has recently started requiring monitoring of adjacent private water wells to oil/gas production operations. This action would be included in any analysis undertaken through a MLP.

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

b) The BLM should have a representative at the table to negotiate minimum instream water flows for all aquatic life! I assume BLM is available for comment on the state's water plan due for final approval in Dec 2015.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

Thousand Peaks Ranch is crisscrossed by several streams and wetlands, which serve as the primary water source for the cattle. The homeowners association allows a non-resident rancher to graze his cattle in return for a cattle lease. Without that income, the ranch would not be financially able to maintain its approximately 50 miles of internal unpaved roads, and particularly to use its snowblower to remove the deep, drifted snows from those unpaved roads. Some lot owners themselves have livestock, primarily cattle and horses, on their own lots. Thousand Peaks Ranch also serves, with its water resources, as home for migratory and native birds, antelope, and other wildlife. Three state wildlife areas are in close proximity: Tomahawk, 63 Ranch, and Knight-Imler

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Drinking Water Resources. First and foremost, the MLP must protect the important drinking water resources in the planning area, as South Park provides drinking water to more than two million Denver and Aurora residents. To protect this critical water supply, we recommend that the MLP:

Expressly aim to: (1) protect the supply of drinking water resources in the planning area; and (2) maintain and preserve the condition and quality of this supply;

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Include an inventory of all of the water resources in the planning area, with a description of their associated values and uses

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

South Park contains the headwaters of the South Platte River and is the source of drinking water for at least a third of the Denver area's residents; since almost all of our ASGD members live in the Denver metro area we are concerned about impacts on water quality from leasing in South Park. We also note that about 85 percent of Colorado's population lives in the South Platte basin.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

A water quality study of the South Park region provides useful information about existing hydrology and water quality in South Park as of 2012 (for both groundwater and surface waters). BLM should consider this analysis in the EIS.

Organization1:City of Aurora

Commenter1:Marshall Brown

Comment Excerpt Text:

Aurora Water supplies drinking water to over 348,000 residential, commercial and industrial customers in our community. Nearly 50 percent of Aurora's water supplies originate from the South Park watershed and the other 50 percent are introduced into the watershed via a trans-mountain diversion to Spinney Mountain Reservoir.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The RMP should include the following:

- Description of the current water quality condition for each surface water body within the proposed boundary including intermittent, perennial, and ephemeral streams, lakes, rivers, reservoirs, and surface water sources.

- A map and list of Clean Water Act impaired or threatened water body segments, including designated uses and specific pollutants.
- A map of municipal watersheds and designated source water protection zones.
- Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent or ephemeral channels.
- Consider a sediment load analysis if projects are to implemented, since impaired streams in South Park are impacted by sediment.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The RMP should include the following:

- A description of all aquifers in the RMP area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof:
  - Which supplies any public water system
  - Which contains a sufficient quantity of groundwater to supply a public water system
  - Currently supplies drinking water for human consumption
  - Contains fewer than 10,000 mg/l total dissolved solids
  - Which is not an exempted aquifer (see CFR Section 144.3)
- A summary of available water quality and water yield information for each aquifer and any trends. Specific attention shall be made with respect to naturally occurring radioactive materials (NORM) such as uranium and radon.
- Maps depicting the locations of sensitive groundwater resources such as municipal watersheds, source water protection zones, sensitive aquifers, recharge areas, and important groundwater surface water interaction zones such as fensand other types of wetlands.
- Description and map of faults within the RMP boundary.
- Description of and locations of groundwater use including public water supply wells, domestic wells, springs, and agricultural and stock wells.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The wetlands of South Park are comparable to few others found in the world.

The geologic and hydrologic setting found in South Park combines to create wetlands known as “extreme rich fens,” so named because of their high concentrations of minerals. These fens provide habitat for 14 state-rare plant species, two of which are BLM Sensitive and globally rare: Porter feathergrass (Ptilagrostis porteri) and Greenland primrose (Primula egaliksensis). They also provide habitat for 11 state- and globally-rare invertebrate species. Other wetland types located in Park County include playa lakes, wet meadows, springs, alkaline wet meadows and springs, and riparian wetlands.

From 2001-2004, BLM also contracted ecological mapping of unique mire and fen wetlands in South Park (Johnson and Gerhardt, 2002; Culver, 2004). Survey, characterization, and evaluation of the condition of these and other wetlands resulted in 31 BLM parcels with wetland/riparian habitat totaling 781 acres in the South Park study area. Three globally vulnerable plant associations and six common plant associations were documented on public lands. (EA 2005)

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

The Arkansas River itself is an important vehicle for the diversion, storage, transportation, and general management of water in the basin, including the implementation of exchanges.

Organization1:Denver City Council

Commenter1:Jack Paterson

Comment Excerpt Text:

The importance of the South Park and Upper South Platte watershed cannot be overstated as to its water infrastructure, agriculture, recreation, fisheries and wildlife and its economic impacts. The reservoirs of the Upper South Platte watershed supply drinking water to approximately one third of Colorado's residents. Almost half of Denver Water's 4,000 square mile collection system is within Park County. Nearly one-fourth of all Coloradans, living in Denver and numerous other communities, depend on the Denver Water system.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

The Upper South Platte watershed is a 2,600 square-mile area which lies within the RMP planning area, extending from the Continental Divide to Strontia Springs Reservoir, southwest of Denver. The Upper South Platte watershed supports many uses and resources, including: headwater streams and sources of public drinking water, wildlife habitat, tourism, agricultural tradition, air quality, gold medal fisheries, and the economies of many communities. The headwaters of the Upper South Platte watershed contain five major municipal water supply reservoirs (four of which are owned/operated by Denver Water): Antero, Spinney Mountain, Eleven Mile Canyon, Cheesman and Strontia Springs, as well as several smaller reservoirs.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Denver Water is responsible for the collection, storage, quality control and distribution of drinking water to 1.3 million people in the city of Denver and surrounding suburbs comprising nearly one quarter of the population of Colorado. The primary water sources for our collection system include: the South Platte River, Blue River, Williams Fork River and Fraser River watersheds. However, the South Platte River (including the South, Middle and North forks) provides approximately fifty percent of our water supply.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

It is important to characterize both the existing and potential ground water drinking water resources in the planning area. We recommend the Draft RMP/EIS include the following information:

A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system; or (2) which contains a sufficient quantity of ground water to supply a public water system; and (i) currently supplies drinking water for human consumption; or (ii) contains fewer than 10,000 mg/1total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3);

Available water quality and water yield information from each aquifer;

Maps depicting the location of sensitive groundwater resources such as municipal watersheds, source water protection zones (available from the Colorado Department of Public Health and the Environment [CDPHE] and see comment #4 below), sensitive aquifers, and recharge areas;

Descriptions and locations of ground water use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells); and

A map and discussion of proposed wells, existing producing wells, and nonproducing wells in the area including their status (e.g., idle, shut-in, plugged, and abandoned), if available. Please refer to the Colorado Oil and Gas Conservation Commission (COGCC) for location and abandonment information.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA recommends the Draft RMP/EIS describe the current water quality conditions for surface water bodies within the planning area, including intermittent, perennial, and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water resources. We recommend comparing existing conditions to existing water quality standards or other reference conditions and presenting associated water quality status and trends.

The EPA also recommends the Draft RMP/EIS include the following information:

A map of water bodies within and/or downstream of the planning area that includes perennial, intermittent and ephemeral water bodies; water body segments classified by the CDPHE as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by CDPHE, and water bodies that have not yet been assessed by the CDPHE for impairment status. We also recommend that a table be provided to identify the designated uses of water bodies and the specific pollutants of concern, where applicable; and

Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent/ephemeral channels.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Increased sediment from surface disturbance may degrade water quality. Because sediment loading has already caused impairment of water bodies in the planning area, and future activities (including livestock grazing, oil and gas development, and use of off-highway vehicles) that may be authorized under this RMP would result in new surface disturbance that may enable erosion, it is important the Draft RMP/EIS include information about this concern. Erodible soils may represent a significant source of pollutants in the planning area. Depending on a host of variables including soil characteristics, industrial operations and topography, associated runoff could introduce sediments as well as salts, heavy metals, nutrients and other pollutants into surface waters.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with BLM-authorized activities in the planning area, the EPA recommends that groundwater and surface water sources of public drinking water supplies, and the associated source water assessments and source water protection zones, be identified in the Draft RMP/EIS. To assist you with this effort, the EPA and the CDPHE can develop a map showing the generalized areas of the source water assessments and protection zones in/near the planning area. Such a map may be used in public documents; therefore, we recommend including it in the Draft RMP/EIS. However, more specific maps, available from CDPHE, can be utilized by the BLM when locating activities on the leased parcels. Please contact John Duggan, CDPHE, via the contact information below for a map of the Public Water Supply Inventory Regions in the planning area. We also recommend identifying reservoirs that are drinking water sources and disclosing potential impacts to these sources.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Water demand associated with mining or the drilling and completion of new wells in the planning area is an important consideration that will benefit from analysis and disclosure. Depletion of surface water in the planning area watersheds may affect major rivers and produced water from oil and gas development may affect groundwater. We recommend that the Draft RMP/EIS include a general discussion of the following:

- A range of estimated water demand per well developed in the planning area (based on predicted well depths, formation characteristics, and well designs, as well as hydraulic fracturing operations, if used);
- Possible sources of water needed for oil and gas development; and
- Potential impacts of the water withdrawals (e.g., drawdown of aquifer water levels, reductions in stream flow, impacts on aquatic life, wetlands, and other aquatic resources). In addition, the EPA recommends the Draft RMP/EIS include a general discussion of how flow back and produced water will be managed including:
- Estimated volume of produced water per well;
- Options and potential locations for managing the produced water (i.e., UIC wells, evaporation ponds, and surface discharges);
- Possible target injection formations, formation characteristics and depth of any UIC wells; and
- Potential impacts of produced water management.

The EPA also recommends the BLM encourage operators to consider recycling produced water for use in well drilling and stimulation, thereby decreasing the need for water withdrawals and for produced water management/disposal facilities and minimizing the associated impacts

Commenter1:Emil McCain

Comment Excerpt Text:

In his 1966 USGS water supply paper on Huerfano County, Colorado, McLaughlin stated that "the altered zones of shale associated with dikes and sills can be looked upon as conduits through which water can move readily." In a recent case here in Huerfano County, Petroglyph Energy, Inc. was found to have tapped into tributary water during coalbed methane extraction, contaminating several water wells in the River Ridge Community west of Walsenburg, Colorado. The Colorado Oil and Gas Conservation Commission (COGCC) determined the contamination of tributary water had most likely been caused by vertical water movement along dikes. This is a recent local case of igneous dikes allowing tributary water to move across sedimentary strata, during which process it was contaminated by Oil and Gas exploitation processes and subsequently polluted domestic drinking water wells of local residents. This is pertinent current local information on how Huerfano County dikes likely facilitate vertical movement of tributary water.

Commenter1:Gene R. Reetz

Comment Excerpt Text:

WATER RESOURCES Clearly water issues are a major concern and especiallyimportant in the semiarid environment of the RMP.

The draft RMP/EIS should include a thorough and complete inventory of ALL the water/aquatic resources within the RMP area.

Information on both water quantity and water quality should be included in the inventory.

The inventory should include all surface water, rivers and streams, lakes, ponds and reservoirs, wetlands, springs and seeps, riparian areas, ground water/aquifers, etc.

The inventory should be based on the many available resources (USGS, State Engineer, Colorado Natural Heritage Program, etc.).

The above information should be included in the Draft RMP/EIS in narrative fashion as well as maps.

All proposed activities/management plans (i.e. oil/gas/mineral leasing, travel plans, grazing, recreation, etc.) should be evaluated in terms of their impacts on the water/aquatic resources.

The Draft RMP/EIS should maximize protection (and restoration if applicable) to the area's water/aquatic resources.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

B. Watershed, Wetlands, Riparian Corridors and Aquatic Species

This area contains numerous headwater tributaries, seeps and springs that keep the water cycle intact,(see p. 42 of the 2004 Gold Belt TMP as well as water resources GIS maps in RGFO office) Fourmile Creek and other streams harbor important fisheries, amphibians and other populations of aquatic species that are vulnerable to trails, sedimentation, soil compaction and human disturbance introduced by trails. The RMP needs to analyze these potential impacts of trail development.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Denver Water is responsible for the collection, storage, quality control and distribution of drinking water to 1.3 million people in the city of Denver and surrounding suburbs comprising nearly one quarter of the population of Colorado. The primary water sources for our collection system include: the South Platte River, Blue River, Williams Fork River and Fraser River watersheds. However, the South Platte River (including the South, Middle and North forks) provides approximately fifty percent of our water supply.

The Upper South Platte watershed is a 2,600 square-mile area which lies within the RMP planning area, extending from the Continental Divide to Strontia Springs Reservoir, southwest of Denver. The Upper South Platte watershed supports many uses and resources, including:

headwater streams and sources of public drinking water, wildlife habitat, tourism, agricultural tradition, air quality, gold medal fisheries, and the economies of many communities. The headwaters of the Upper South Platte watershed contain five major municipal water supply

reservoirs (four of which are owned/operated by Denver Water): Antero, Spinney Mountain, Eleven Mile Canyon, Cheesman and Strontia Springs, as well as several smaller reservoirs.

B.1.4.3. Water - Impacts

Total Number of Comments: 32

Summary

Research has shown that hydraulic fracturing (fracking) and wastewater injection is damaging to the environment, including drinking water, and is too risky to allow. With the increasing population in Colorado and its consequent increase in the demand for water, the risk of using water for hydraulic fracturing is not worth the risk of water contamination. Most commenters were against hydraulic fracturing. There were several recommendations that the RMP analyze potential impacts of resource extraction and erosion and sedimentation from surface-disturbing projects, grazing, and trail development to groundwater and surface water quality and quantity. Methods and topics to be covered in the analysis also were suggested. The RMP should disclose and mitigate potential impacts of soil disturbance. The negative effects of water discharge from oil and gas drilling on the chemical composition of soils and fisheries, increasing flow in intermittent streams, and the costs of retaining-pond failures and blowout effects on aquifers were described. The BLM should account for the full social costs of oil and gas drilling.

See Section 2.3.1.3, Water (p. 20)

Commenter1:Evi Bunker

Comment Excerpt Text:

As a citizen of the United States I feel very strongly that ourgovernment should be listening more to our concerns about our futureresources, and I hope that our concerns in the regard to fracking willbe listened to. More and more research shows how damaging fracking hasbeen to our environment, our clean air and water - resources we need for the survival of our species. Recent research has also shown that (especially tar sand) fracking is not that profitable! the damage to the surrounding land is not worth the permission to proceed!

Commenter1:Susan Price

Comment Excerpt Text:

I live next to 8 wells w/11 more on the way! It's HORRIBLE! I don't drink my tap water at all. And the noise was hardly bearable! It's a nasty business that wastes our precious resources, poisons the Earth & is dangerous to ALL!!!!!

Commenter1:Carolyn Taylor

Comment Excerpt Text:

hope that fracking is taking its last breath. The public knows too much about the dangerous effects of this process. I believe that methane cannot be trapped and kept in the ground forever. Give it 20 - 40 years to surface out of rusting steel and crumbling cement. The poisoning of our limited resource, water, is insane.

Commenter1:David Williams

Comment Excerpt Text:

Fracking and fossil fuel extraction threaten to degrade our landscapes, air and water irreparably. Once despoiled by development, the land will likely not regain its original state. And while the EPA says that fracking rarely affects water supplies, I am not willing to take any risk whatsoever. Fracking has and does pollute ground water with toxic chemicals

Commenter1:Skip Edwards

Comment Excerpt Text:

Fracking Colorado's public lands will also risk the quality of drinking water for millions of Coloradans now and far into the future

Commenter1:Nicholas DiOrio

Comment Excerpt Text:

Oil and gas extraction also requires extremely large amounts of water, which will have to come from already burdened high country resources. Sensitive existing water resources may be contaminated by chemicals, further burdening Colorado's already dwindling water supply. Assurances from oil and gas developers regarding the safety of the extraction process have too often failed to mitigate the very real dangers to people, wildlife, and water.

Commenter1:Claudia Ryan

Comment Excerpt Text:

Parts of Colorado have already experienced extensive land and water damage due to the oil industry's use of fracking. I sincerely hope that we will not see Colorado systematically destroyed by industrial use.

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Prohibit drilling within the immediate vicinity of all surface waters in the planning area, including ephemeral and intermittent waters

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Prohibit drilling within one-half mile of Gold Medal trout fishing waters and within one-quarter mile of other trout fishing waters.

Commenter1:Steven Horneffer

Comment Excerpt Text:

Fracking Colorado's public lands will also risk the quality of drinking water for millions of Coloradans, as well as all those downriver in Utah, Arizona, etc., - a risk that is unnecessary, irresponsible and far too great.

Commenter1:Jim Engelking

Comment Excerpt Text:

Fracking Colorado's public lands will also risk the quality of drinking water for millions of Coloradans - a risk that is unnecessary, irresponsible and far too great. Water is our most precious resource. We can live without oil and gas, but die without water. All exemptions from the Clean Water Act and Underground Injection Control Act must be removed first.

Commenter1:Angela Miller

Comment Excerpt Text:

Colorado is such a beautiful place to live, PLEASE do not allowing fracking. Yes it would be money into Colorado, but it is NOT worth the risk. We still do not know what happened to fracking holding tanks that floated away in the floods of 2014. The chemicals used in fracking will not be filtered out with a water filter. Please do not allow fracking.

Commenter1:Lyn Miller

Comment Excerpt Text:

We already need water from the Colorado and other rivers to sustain us in the large municipalities along the Front Range; in the future, with our populations increasing, we will need every single drop available to us to sustain us. That won't be possible if millions of gallons of water have been used to frack wells and that polluted water then contaminates our aquafers.

Commenter1:Lynn Welch

Comment Excerpt Text:

A state ordered review , last week in California, revealed that fracking poses a threat to public health. Fracking waste water is a serious problem. There are no good solutions for reclamation or storage of waste water. We do not know how waste water storage will ultimately effects our environment as it dissipates into the ground. There are so many long term adverse effects from fracking to produce a product that is immediately consumed.

Commenter1:Mary Ewing

Comment Excerpt Text:

We can learn from the east USA experience re. some of the dangers of fracking, or wecan wait for legitimate studies to determine the potential dangers. Fracking Colorado's public lands puts the quality of drinking water for millions of Coloradans at risk - a risk that is unnecessary.

Commenter1:Kathy Peterman

Comment Excerpt Text:

I am writing to express concern about BLM land that is slated for disposal in the Gillett and Bernard Creek East area. As a visitor to the Cripple Creek area, we love catching glimpses of wildlife, and seeing the grazing of cattle on the land. It is such a contrast from the city.

If BLM parcels were sold to the public, development and high density would inevitably occur. Water wells would be drilled, septic systems installed, causing stress to the water table.

Commenter1:Ruth Leuchte

Comment Excerpt Text:

It has just recently been scientifically studied and proven in Oklahoma that the wastewater from fracking which is injected back into the ground has caused numerous newly occurring earthquakes.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Further environmental analysis be conducted on those areas containing important Gold Medal waters along the Middle Fork of the South Platte River and the Arkansas River (which includes a new stretch of additional 102 miles of Gold Medal waters along the Upper Arkansas River, designated in 2014).

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

BLM should consider implementing baseline water sampling requirements where development occurs in sensitive and unstable water tables. Water quality and quantity is increasingly becoming a topic of environmental concern due to drought and climate change. Water tables in South Park are generally shallow and are susceptible to contamination associated with oil and gas development. Consequently, requiring that water wells be drilled and monitored from the beginning of drilling operations to the time of abandonment and reclamation is a reasonable, cost effective requirement that will ensure the health and vitality of water supplies and prevent harmful chemicals from contaminating water supplies. If monitoring wells detect the presence of harmful chemicals, it should trigger an emergency response that requires immediate mitigation and remediation.

Commenter1:Misi Ballard

Comment Excerpt Text:

With the creation of the South Park Master Leasing Plan, we have the opportunity to set in place the highest standards of environmental protection for the headwaters of the South Platte River, the main source of drinking water for the residents of Park County and Colorado's Front Range communities. I strongly urge BLM to incorporate the environmental protections and detailed technical recommendations included in the Park County MLP Comments as they develop the South Park Master Leasing Plan and to carefully consider the irreplaceable nature of all South Park's natural resources.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Because a National Pollutant Discharge Elimination System permit is not required for oil and gas operations, it is particularly important that the impact of runoff is considered as part of the NEPA process. The RFD for the Royal Gorge Field Office estimates average surface disturbance per well, the total number of wells to be developed through 2030, and predicts the likely distribution of new oil and gas development, all of which should inform the EIS's analysis of storm water runoff impacts within local watersheds.

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

Many communities, including Colorado Springs, depend on watershed lands managed by BLM for high quality water supplies. Impacts to the lands either as a result ofnatural disaster, over-grazing, poor travel management, or inadequate oil and gas regulation/oversight can potentially cause significant degradation to water quality. As the RMP process moves forward, Utilities would recommend the BLM considers the impacts of each alternative to the source water protection areas of local and regional water suppliers.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA recommends that the Draft RMP/EIS analyze potential impacts to ground water quality and quantity related to resource extraction such as mining and oil and gas production. Potential impacts include those associated with the following: leaks and spills; production and disposal of produced water or processing waters; use of pits, underground injection control (UIC) wells, infiltration basins and evaporation ponds; production wellbore integrity; closure requirements; pipeline use; and impacts associated with restimulation and abandonment of existing wells

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We recommend that the Draft RMP/EIS analyze potential impacts to surface waters related to erosion and sedimentation from land disturbance and stream crossings, as well as potential impacts associated with oil and gas well development, including drilling and production and potential spills and leaks from pits, evaporation ponds, and pipelines. We also recommend that the BLM analyze potential impacts to impaired water bodies within and/or downstream of the planning area, including water bodies listed on the most recent EPA-approved CWA § 303(d) list and coordinate with CDPHE if there are identified potential impacts to impaired water bodies (in order to avoid causing or contributing to the exceedance of water quality standards).

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

To fully disclose and, if necessary, mitigate the potential impacts of soil disturbance, we recommend that the Draft RMP/EIS include an estimate of erosion rates and resulting impacts to water quality for each alternative. For example, the Wyoming BLM's Bighorn Basin Draft RMP/EIS estimated erosion rates based on projected amount of surface disturbance, types of surface disturbance and general characteristics of the basin (erodible soils, slopes, etc.). Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a webbased interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://www.ars.usda.gov/Research/ docs.htm?docid=l 8084&pf=l . We recommend that the BLM consider using this model or another appropriate model that would be applicable to this planning area.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA recommends that the Draft RMP/EIS include a summary description of the types of impacts that may result from grazing to wetlands and associated springs. Such impacts may include functional conversion of wetlands (e.g., forested to shrub-scrub); changes to supporting wetland hydrology (e.g., snow melt patterns, sheet flow, and groundwater hydrology); and wetland disturbance. With respect to grazing, we also recommend that the Draft RMP/EIS describe how the BLM intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands" as described in Executive Order (EO) 11990, Protection of Wetlands.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The potential environmental impacts of grazing may stem from vegetation loss, accelerated soil loss, bank erosion, soil compaction, increased surface storm flow, reduced stream base flows

from decreased infiltration to groundwater, and changes in water temperature associated with shade loss or channel widening. Based on the BLM's experience with grazing in the planning area, we recommend the Draft RMP/EIS include an assessment of each alternative's potential impacts and benefits to aquatic resources, including impacts to water quality, stream and wetland processes, and fish populations/habitat.

Commenter1:Evi Klett

Comment Excerpt Text:

Furthermore, extraction in the headwaters of the South Platte watershed is outrageous. Millions of people will be using that water downstream. Pumping toxic chemicals deep into the rock to extract a toxic substance that needs to stay in the ground anyway is way too risky! Headwaters are much too important a resource to risk poisoning!

Commenter1:Emil McCain

Comment Excerpt Text:

The complexity of the area's extremely complicated and widespread igneous intrusions and extensive faults that dissect the Huerfano Valley and the areas to the south towards the Spanish Peaks must be considered when permitting projects that can damage water supplies in Huerfano County

Commenter1:Daniel Griffith

Comment Excerpt Text:

Even if fracking was safe, it would still use an immense amount of water.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

e Booger Red/Bare Hills/Four Mile, the area contains numerous headwater tributaries, seeps and springs that keep the water cycle intact,(see p. 42 of the 2004 Gold Belt TMP as well as water resources GIS maps in RGFO office)

Fourmile Creek and other streams harbor important fisheries, amphibians and other populations of aquatic species that are vulnerable to trails, sedimentation, soil compaction and human disturbance introduced by trails. The RMP needs to analyze these potential impacts of trail development.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Costs: Water Pollution

One of the major environmental costs associated with oil and gas drilling is increased water pollution. The discharge of ground water can deplete freshwater aquifers, lower the water table, and dry up the drinking water wells of homeowners and agricultural users. The short-term economic costs include drilling new, deeper wells for current and future homeowners, ranchers and farmers, (assuming successful wells can be found) and/or the costs of relocating families to new homesites. If the freshwater aquifers do not fully re-charge, the long-term economic costs to affected landowners, homeowners, communities, and states across the west could be severe, including the foregone opportunity (option value) to use aquifer water in the future. BLM must fully examine and account for these risks and costs associated with water pollution from drilling.

The water discharged from oil and gas wells can be highly saline with a very high sodium absorption ratio (SAR) – a ratio that affects how water interacts with soil. Water with a high SAR can permanently change chemical composition of soils, reducing soil, air and water permeability and thereby decreasing native plant and irrigated crop productivity. We recommend that the BLM analyze the costs due to the loss of productivity and include these in the socio-economic impacts of alternatives that call for increased oil and gas drilling.

The discharge of tens of thousands of gallons of ground water transforms many streams that normally flow intermittently only during spring runoff or after storms into all-season streams. The influx of water has resulted in deep channel scouring, erosion, and increased sedimentation. Increased sedimentation in streams can negatively impact native fisheries found in mainstream drainages with increased likelihood and financial costs from fishery restoration projects. BLM should analyze the additional costs for fisheries restoration due to increased oil and gas drilling.

The discharge of water into intermittent stream channels damages native flora and fauna not adapted to year-round water and promotes the spread of noxious weeds. The change in native vegetation composition, combined with the increase in noxious weeds, negatively impacts threatened and endangered species and other wildlife, as well as cattle. The loss of native species and the spread of noxious weeds across the west has enormous economic costs to the public and private interests. BLM should analyze the additional costs from noxious weed mitigation from increased oil and gas drilling.

Trout Unlimited contracted for a literature review of the impacts of oil and gas development and exploration on coldwater fisheries. The report concludes that many of the studies reviewed "point towards confirmed deleterious effects caused by gas and oil exploration and development." Confluence Consulting 2005. The authors also identify a study, investigating the accumulations and sublethal effects of Wyoming crude oil on cutthroat trout, which found that the allowable discharge level in most states of 10 mg/L were far too high, 400 times that recommended by the EPA, and produced significant physical and toxic effects on the trout. While also pointing out the need for further studies, the Trout Unlimited report highlights the growing body of evidence that oil and gas development results in substantial negative effects on water and the wildlife that depends on it for survival. BLM should analyze the impacts on fish habitat from increased oil and gas drilling, and include mitigation costs in the analysis of the socio-economic impacts.

The landscape is also impacted from the retaining ponds or reservoirs constructed to store the water discharged from the drilling operation. The constructed earthen dams and retaining ponds destroy additional habitat and introduce artificial structures to the landscape. Habitat and homes on property nearby reservoirs also have potential flood risk from structural failure of the poorly designed, quickly built retaining ponds and reservoirs during storm events, for example. BLM should estimate the risk of flooding due to retention pond failure and include these costs in the estimation of the socio-economic impacts.

And finally, drilling for oil involves ecological risks and potential economic costs associated with blowouts -- the catastrophic surge of the highly pressurized fluid from the drill hole that can cause fires, loss of life and property, and the potential contamination of surface drinking water sources. To reduce the number of blowouts, rotary drilling operations typically inject a fluid of drilling muds into the drill hole in order to lubricate and cool the drill bit. While reducing the number of blowouts, the drilling fluids themselves create a risk of contamination of adjacent freshwater aquifers. Gauthier-Warinner 2000. BLM needs to include an analysis of the probability of these types of accidents, along with their associated costs in the socio-economic impacts of oil and gas drilling.

In developing a new RMP for the Royal Gorge Field Office, BLM must account for the full impacts of oil and gas drilling on water quality and include those impacts in the analysis of the economic and social impacts of the RMP alternatives.

B.1.4.4. Water - Mitigation Measures

Total Number of Comments: 15

Summary

Many commenters suggested requiring setbacks (NSOs), withdrawals, and no leasing stipulations, preferably with no waivers, for oil and gas operations near wetlands, fens, playas, riparian areas, surface water, and source water protection zones to provide an opportunity for remediation in

the event of accidental spills and attenuation if remediation is not immediate. Commenters provided distances from each water resource type that should be considered for these restrictions. It was suggested that setbacks should be based on the agreement in the MLP stakeholder process and that many of the BMPs be based on the CPW 2012 BMPs. Well casing measures were recommended to protect groundwater from drinking water sources. BMPs for protecting water resources from livestock grazing, such as exclusions, upland water developments, pasture rotation, controlled timing of grazing, and allotment boundary modifications, should be described in the RMP. A commitment to BMPs and mitigation measures should be required for each project prior to its authorization.

See Section 2.3.1.3, Water (p. 20)

Commenter1:Eddie Kockman

Comment Excerpt Text:

Extensive purchase of water used for hydraulic fracturing that comes from existing agricultural rights could have negative impacts in the long-term both to agriculture and the economy of Park County. Should there be documented contamination of water supplies from shallow, or deep water sources, there should be a commitment to clean up the contamination as a first priority. If this is not possible long-term water supplies must be replaced, or a financial reimbursement made to the parties impacted that is equal to the long-term value of the contaminated water.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Mitigation Strategies for Water Resources (Stipulations and BMPs)

Contaminants from oil and gas surface events such as spills, pit and pipeline leks, and nonpoint source runoff from surface disturbance have the potential to enter and impact surface water resources as well as environmental and recreational beneficial uses if these events occur in close proximity to water bodies. If oil and gas surface activities are set back from the immediate vicinity of surface water, wetlands, and designated source water protection zones, this provides an opportunity for accidental releases of pollutants to be detected and remediated before they reach water resources. If accidental releases are not detected, the setback provides a safety factor and some possibility of natural attenuation to occur. Setbacks also help prevent nonpoint source pollutants such as sediment from impacting surface waters and degrading ambient water quality throughout the watershed.

Park County recommends the following for surface water:

- Based on discussions and general agreement during the MLP Stakeholder process, oil and gas setbacks (or no surface occupancy (NSO) stipulations) should be 500 feet from the ordinary high-water mark from streams (both perennial and intermittent), lakes, reservoirs, springs, wetlands, other riparian areas; and 100 feet from ephemeral drainages (see Attachment 1 for comparable setback requirements). For all NSO stipulations mentioned in this letter, the County prefers that there are no Waivers, Exceptions or Modifications to the NSO stipulation.

- NSO within 100-year floodplains, or 500 feet from the stream, whichever is greater.

Park County Regulations regarding Water Body Setbacks require the following: (http://parkco.us/DocumentCenter/Home/View/264 (Division 10)

- "Activities associated with the Oil and Gas Operation shall be located a minimum of 500 feet from any Water Body unless such a setback would interfere with spacing requirements established by the Colorado Oil and Gas Conservation Commission.
- Water Body: A perennial or intermittent river, stream, lake, reservoir, pond, spring or wetland, but does not include irrigation ditches or roadway drainage ditches or artificial lakes or ponds or wetlands that are created and used for the primary purpose of agricultural operations. A Water Body may be described as one of the following:
- Intermittent River, Stream, Lake, Reservoir, Pond, Spring or Wetland.
- A Water Body that normally holds water or flows at least 60 days a year as a result of ground water discharge or surface runoff.
- Natural Water Body. A Water Body not created for the purpose of a land use change.
- Perennial River, Stream, Lake, Reservoir, Pond, Spring or Wetland. A Water Body that normally holds water or flows continuously during all of the year as a result of ground water discharge or surface runoff.
- Consider a designation of NSO within and/or setback from Areas of Critical Environmental Concern (ACECs) or other valued areas to preserve and protect significant resources and sensitive habitats. For example, one of the unique resources in the Upper South Platte Watershed is the exceptional fisheries and Gold Medal waters. Park County recommends a NSO stipulation within stream channels, stream banks, and an area 2,640 horizontal feet (0.5 miles) either side of the ordinary high water mark (bank-full stage) of Gold Medal rivers/streams and Gold Medal reservoirs including Spinney Mountain Reservoir. This proposed NSO area is consistent with BLM visual resource management guidelines to protect exceptional fisheries, scenic values, visual impacts and riparian management based on impact analysis. The areas that this protection would apply to are defined on Figure 1.
- Prohibit evaporation ponds within the MLP area
- Pipelines that cross perennial streams are required to be bored or other BMPs used to minimize damage.
- Use the minimum right of way width where pipelines cross riparian areas and streams.
- Prohibit pipelines through wetlands and fens.
- Construct all crossings at right angles to the stream to reduce stream bank erosion.
- No direct discharge of pipeline hydrostatic test water to any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river
- Avoid dust suppression activities (other than water with no additives) within 500 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river to ensure any magnesium chloride or similar dust control compound does not come in contact with live water.7

- Disinfect and clean heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond or wetland prior to moving the equipment to another water body.

*note that many of the recommendations in this section are derived from the CPW 2012 BMP document referenced at the end of this comment letter.

5 The Example Fluid Mineral Setback, Buffer Stipulations for Surface Waters on Federal Lands/Minerals document provides existing setback requirement examples from around Colorado and the Western US. This document provides the references that establish the need for a 500-foot NSO setback. Please see these references in Attachment 1.

6 A compiled list of existing RGFO stipulations are in Attachment 2.

7 CPW (2012), Colorado Parks and Wildlife BMPs

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County recommends the following for ground water:

Consider using well casing design measures such as:

Surface casing and cement or a combination of surface and intermediate casing and cement, through the bottom of the lowermost USDW to prevent shallow non-commercial gas or poorer quality groundwater from moving into and impacting a USDW.

Formation pressure integrity testing of the surface casing shoe and cement to ensure the surface casing, cement and shoe have integrity.

Placement of cement above the production formation perforation, as needed, to provide zonal isolation between the producing zone and all other subsurface formations. This would protect ground water resources above the production formation from potential impacts associated with injection of hydraulic fracturing fluids and other stimulation techniques and from hydrocarbon production.

Completion of cement bond logs (or other logs that would assess cement integrity) on production, surface and intermediate casing cement to verify that good cement bond is present.

These measures are consistent with the American Petroleum Institute's guidance (APE Guidance Document HF 1: Well Construction and Integrity Guidelines, First Edition, October 2009).

A minimum setback of 500 feet for private wells and homes. State law requires a 500-foot setback from occupied dwellings.

Consider a mitigation plan for remediation of future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impact through treatment, replacement, or other appropriate means

Public drinking water sources should be protected using NSO stipulations for:

Local Source Water Protection Planning areas where delineated in a Source Water Protection Plan

Drinking water protection areas as defined by Source Water Assessment areas evaluated by the State of CO

For groundwater sources, a ½-mile NSO or CSU concentric buffer

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County has proposed minerals withdrawal, No Leasing, and No Surface Occupancy stipulations to protect drinking water resources within Park County

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Mitigation Strategies for Water Resources (Stipulations and BMPs)

Contaminants from mining, alternative energy or other projects on BLM land have the potential to enter and impact surface water resources as well as environmental and recreational beneficial uses if these events occur in close proximity to water bodies. If projects are set back from the immediate vicinity of surface water, wetlands, and designated source water protection zones, this provides an opportunity for accidental releases of pollutants to be detected and remediated before they reach water resources. If accidental releases are not detected, the setback provides a safety factor and some possibility of natural attenuation to occur. Setbacks also help prevent nonpoint source pollutants such as sediment from impacting surface waters and degrading ambient water quality throughout the watershed.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County recommends the following for surface water for all projects including mining and renewable energy:

- Setbacks, or No Surface Occupancy (NSO) stipulations, should be 500 feet from the ordinary high-water mark from streams (both perennial and intermittent), lakes, reservoirs, springs, wetlands, other riparian areas; and 100 feet from ephemeral drainages (see Attachment 2 for comparable setback requirements). For all NSO stipulations mentioned in this letter, the County prefers that there are no Waivers, Exceptions or Modifications to the NSO stipulation.

- For uranium mining, a setback from selected water bodies (including all reservoirs) in order to prevent the migration of mining-related contamination into the drinking water supply for 1.5 million people. The distance from the water bodies would be determined by calculation of ground water velocity, but a minimum of 1,000 feet is proposed. In-situ uranium mining should

be restricted due to the complex geology of these aquifers and the potential for unintended migration of uranium or other radionuclides.

- NSO within 100-year floodplains, or 500 feet from the stream, whichever is greater.
- Consider a designation of NSO within and/or setback from Areas of Critical Environmental Concern (ACECs) or other valued areas to preserve and protect significant resources and sensitive habitats. For example, one of the unique resources in the Upper South Platte Watershed is the exceptional fisheries and Gold Medal waters. Park County recommends a NSO stipulation within stream channels, stream banks, and an area 2,640 horizontal feet (0.5 miles) either side of the ordinary high water mark (bank-full stage) of Gold Medal rivers/streams and Gold Medal reservoirs including Spinney Mountain Reservoir. This proposed NSO area is consistent with BLM visual resource management guidelines to protect exceptional fisheries, scenic values, visual impacts and riparian management based on impact analysis. The areas that this protection would apply to are defined on Figure 1.
- Avoid dust suppression activities (other than water with no additives) within 500 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river to ensure any magnesium chloride or similar dust control compound does not come in contact with live water.
- Disinfect and clean heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond or wetland prior to moving the equipment to another water body.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County recommends the following as related to mining, renewable energy, or other projects on BLM land that could impact ground water:

-A minimum setback of 500 feet (1,000 ft for uranium activities) for private wells and homes

-Consider a mitigation plan for remediation of future unanticipated impacts to drinking water wells, such as requiring the project to remedy those impactsthrough treatment, replacement, or other appropriate means

-Public drinking water sources should be protected using NSO stipulations for:

Local Source Water Protection Planning areas where delineated in a Source Water Protection Plan

Drinking water protection areas as defined by Source Water Assessment areas evaluated by the State of Colorado

For groundwater sources, a ½-mile NSO or CSU concentric buffer

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA also recommends that the Draft RMP/EIS discuss measures the BLM will require at the leasing, field-wide plan of development, or APD stage to minimize the potential for these impacts to occur and how the operations will be monitored to determine if the mitigation measures are effective. Appropriate groundwater protection measures can vary depending on hydrologic conditions and the presence of drinking water resources. We recognize that regulations and guidance documents exist to guide BLM and the operator in protecting water resources during oil and gas development and production operations (e.g., BLM Gold Book, Onshore Order #2, State regulations, etc.). We recommend that the Draft RMP/EIS discuss how groundwater will be protected according to these existing regulations and guidances.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

In addition, we note that, in many cases, the existing regulations and guidances leave much of the decision-making regarding water resource protection to determinations by the authorized officer on a well-by-well basis. We recommend that the BLM utilize the NEPA analysis and RMP revision process to streamline or add consistency to these decisions where possible. For example, an understanding of hydro-geological features can help to identify critical elements of well design that will likely be necessary to achieve effective protection of USDWs at the APD stage. In other cases, adequate information may exist at the RMP stage to identify stipulations that will apply to future leases, such as for protection of existing public and private drinking water supply wells.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Specifically, the EPA recommends that the BLM analyze and disclose potential groundwater protection, monitoring and mitigation measures, including:

- BMPs and measures such as water reuse, closed loop drilling, lining of evaporation ponds, monitoring of water quality and water levels, closure and monitoring of tailings ponds, reserve pits and evaporation ponds;

- Setback stipulations, such as No Surface Occupancy (NSO), to minimize the potential for impacts to potential drinking water resources, including domestic water wells and public water supply wells. Setbacks are effective health and environmental protection tools because they provide an opportunity for released contaminants to attenuate before reaching a water supply well. They may also afford an opportunity for a release to be remediated before it can impact a well, or for an alternate water supply to be secured. For these reasons, we recommend that the BLM require a minimum 500 foot NSO setback from private wells. We note that a number of states including Colorado and North Dakota have adopted a 500 foot setback from occupied dwellings (and by default, the associated domestic well). The EPA also encourages the BLM to consider source water protection zones delineated by the CDPHE when evaluating the basis and need for setbacks from public water supply wells (see comment #4 below);

- A mitigation plan for remediating future unanticipated impacts to drinking water wells, such as requiring the operator to remedy those impacts through treatment, replacement or other appropriate means;
- A general production well schematic that depicts the following: casing strings; cement outside and between the various casing strings; and the relationship of the well casing design to potentially important hydro-geological features such as confining zones and aquifers or aquifer systems that meet the definition of a USDW. Discuss how the generalized design will achieve effective isolation of USDWs from production activities and prevent migration of fluids of poorer quality into zones with better water quality; and
- Abandonment procedures for sealing wells no longer in use in order to reduce the potential for inactive wells to serve as the conduits for fluid movement between production zone(s) and aquifer(s). This is particularly important where existing wells do not have surface casing set into the base of USDWs and lack sufficient production casing cement.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

In order to ensure public drinking water supply sources (e.g., surface water sources, including GWUDISW sources, and groundwater sources) are protected from potential impacts associated with resource extraction, the EPA recommends the following NSO protections:

Municipal Supply Watersheds 5 [[5] Forest Service Manual (FSM2542) defines Municipal Supply Watersheds to include: "surface supply watersheds, sole source aquifers, and the protection zones around wells and springs."]- NSO within any of the following areas, as deemed appropriate by the BLM:

- The entire watershed;
- Local Source Water Protection Planning Areas where delineated in a Source Water Protection Plan; or
- Drinking water protection areas as defined by Source Water Assessment Areas evaluated by the State.

  For surface water sources, if the Municipal Supply Watersheds NSO is not deemed feasible by the BLM, then at a minimum, we recommend the Draft RMP/EIS cite the COGCC Regulation 3 17B and incorporate its requirements for protecting surface water drinking water supplies. See the COGCC website for information on regulations and maps, as follows:

- COGCC Rules - http://cogcc.state.co.us/RR Docs new/rules/300Series.pdf
- Public Water Supply Surface Water Supply Area Map http://cogcc.state.co.us/RR Docs new/rules/AppendixVI.pdf

  For groundwater and GWUDISW sources, if the Municipal Supply Watersheds NSO stipulation is not deemed feasible by the BLM, we recommend a minimum one-half mile (2,640 feet) NSO or Controlled Surface Use (CSU) concentric buffer for these sources. This recommendation is based on the professional judgment of the CDPHE Source Water

Assessment and Protection Program (SWAPP). For additional information, please contact the CDPFIE SWAPP Coordinator, John Duggan, at 303-692-3534. The EPA also recommends the BLM include a commitment in the Final RMP/EIS and Record of Decision to provide notice to lessees regarding these important areas in the planning area. Lease notices for drilling within Source Water Protection (SWP) Zones of public water supplies are now being used for all wells drilled under BLM authority within SWP Zones in Utah. (5) Wetlands, Riparian Areas and Floodplains We recommend that the Draft RMP/EIS present inventories and maps of existing wetlands and waters of the U.S. within the planning area, including waters that are regulated under Section 404 of the CWA and wetlands and waters that are protected under Executive Order 11990 - Protection of Wetlands (May 24, 1977). We suggest providing information on acreages and channel lengths, habitat types, values, and functions of these waters. We suggest that the BLM describe potential indirect impacts to wetlands and riparian areas that could occur at the project level due to impacts on the following:

- Stream structure and channel stability;
- Streambed substrate, including spawning habitats; and
- Stream bank vegetation, riparian habitats, and aquatic biota.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We recommend that the Draft RMP/EIS analyze methods to protect wetlands, riparian areas and floodplains, including the following:

- Application of minimum setback requirements through leasing stipulations such as NSO for wetlands and riparian areas. The EPA recommends NSO within the footprint of wetland and riparian areas, as well as a 500 foot NSO setback from wetland and riparian areas;
- Leasing stipulations to protect floodplains, such as NSO within the 100-year floodplain; and
- Delineation and marking of perennial seeps, springs and wetlands on maps and on the ground prior to project level development to ensure identification of these resources to facilitate their protection.
- We also recommend including a list of potential mitigation requirements and BMPs that may be applicable at the project level for grazing, construction, oil and gas well drilling and productionactivities to prevent adverse impacts to these aquatic resources. These could include silt fences, detention ponds and other stormwater control measures.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

The EPA recommends that the Draft RMP/EIS address how water quality monitoring in the planning area will occur at the project level prior to, during, and after anticipated development to detect impacts to both surface water and groundwater resources, including private well

monitoring. The EPA notes that for groundwater, operators will at a minimum need to conform to the Colorado Oil & Gas Conservation requirements for pre-development and post-development groundwater monitoring described in COGCC Rule 609. As Colorado has no requirements presently for surface water pre- and post-development monitoring, the EPA recommends the Draft RMP/EIS describe how project-level monitoring will occur to identify any impacts to surface water resources resulting from oil & gas exploration and production. A recent example of a surface and groundwater quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by the BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS.6 [6]http://www.blm.gov/pgdata/etc/medialib/blm/ut/vernalfo/planning/gascoeis/gasco_folder_6.Par.10452.File.dat/28_Gasco%20Appendix%200.%20Long-term%20Water%20Monitoring%20Plan.pdf

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We support the development of design criteria to be utilized and refined during site specific analyses, including adaptive management/mitigation and monitoring measures to reduce the potential for aquatic resource impacts. Inspection, maintenance and adjustment of BMPs will help protect groundwater and surface water resources. We recommend that the Draft RMP/EIS include a list of potential mitigation measures with consideration of the following:

- Special protections, such as buffer zones, for high quality riparian and wetland resources including springs and fens.
- Management to limit deposition of animal waste in and adjacent to water bodies, such as protecting or repairing any existing exclusions and providing upland water developments and development of new range improvements to discourage congregation near water bodies.
- Enhanced monitoring of resource conditions adjacent to high value water resources.
- Monitoring to assess effectiveness of range improvements in protecting aquatic resources

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We support the BLM's efforts to reduce grazing impacts through the use of BMPs and adaptive management strategies to protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat. In addition, we support consideration of BMPs, such as exclusions and upland water developments, whenever necessary to protect streams, wetlands, riparian corridors, and fishery spawning areas. Adaptive management tools for consideration include pasture rotation based on minimum stubble height, modification of allotment boundaries and controlled timing of grazing to prevent damage to stream banks and riparian areas when they are most vulnerable to trampling damage. In addition, since the planning area is susceptible to periods of drought, we recommend the Draft RMP/EIS include a list of potential grazing strategies for use during periodic droughts that will maintain vegetation and aquatic resources in their desired conditions.

B.1.5. Soil

B.1.5.1. Soil - Alternatives

Total Number of Comments: 5

Summary

The alternatives should consider actions to benefit and/or protect soil resources, such as prioritizing restoration of eroded landscapes, establishing a 500-foot buffer along all streams to protect soil resources from surface-disturbing activities, applying restrictions on surface-disturbing activities on fragile, unique, and sensitive soil types and slopes greater than 25 percent, and prohibiting development in landslide-prone areas, on high slopes (greater than 35 percent), and on fragile or saline soils.

See Section 2.3.1.4, Soil (p. 20)

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

Restoration of eroded lands needs to be a priority. Restoration expert Bill Zeedyk describes inexpensive, successful techniques in "Let the Water do the Work: Induced Meandering, an Evolving Method for Restoring Incised Channels," 2013

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Implementing a 500-foot NSO buffer against all surface disturbances on all streams. Such a buffer will offer stronger protection to sensitive soil regimes, prevent soil erosion, avoid compaction, and preserve organic matter, all of which contributes to reducing excess erosion and sedimentation which negatively impacts streams.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

In areas contain a combination of fragile, unique sensitive soils and slopes that are greater than 25%, we recommend that NSO be applied.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Protect landslide-prone areas, high slopes, and fragile soils.

In areas defined with high landslide inclination we recommend no development activity. This limits potential landscape scale problems and protects not just the ecology of the area but also any development infrastructure from the devastating effects of a landslide.

In areas that are defined with slopes over 35 percent, the BLM should place an NSO stipulation in order to protect soils and associated habitat.

In areas that are defined as fragile or saline soils, NSO stipulations should be implemented that precludes all surface disturbances.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

NSO (no waivers, exceptions or modifications) on steep slopes (over 25%).

B.1.5.2. Soil - Impacts

Total Number of Comments: 1

Summary

The BLM should evaluate the impacts of erosion and sedimentation, as well as mitigation, associated with surface disturbance.

See Section 2.3.1.4, Soil (p. 20)

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Evaluation of erosion and sedimentation impacts, and mitigation associated with surface disturbance.

B.1.6. Geology

B.1.6.1. Geology - Baseline Affected Environment

Total Number of Comments: 2

Summary

The EIS should include a discussion of the importance of the igneous dikes in the Spanish Peaks area.

See Section 2.3.1.5, Geology (p. 20)

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

Boonstra and Boehmer[13] did an "Analysis of Data from Well Tests in Dikes and Fractures" and presented it at the 1987 International Conference on Groundwater Contamination, stating:

"The fractures in a dike are mainly the result of the cooling of magma that intruded along a tensional fracture in the earth's crust. Fractures thus formed in the dike rock are called contraction joints. Van Wijk (1963) recognized joints striking parallel to the dike contacts and joints radiating in three directions, each 120 degrees to each other, thus giving the dike rock a columnar structure.Also the narrow contact zones of massive dikes can be fractured, forming highly permeable conduits where moderate to high yields from wells can be expected. Fractures in the contact zone are mainly the result of shrinkage of the country rock volume near the dike due to the heating and baking during intrusion of the magma. (emphasis added) Contact zones develop best in soft sedimentary rocks like sandstones and shales cut by dikes."

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

Huerfano County and the surrounding "Spanish Peaks region" are rife with dikes. In fact, in 1976, the Spanish Peaks were designated as a National Natural Landmark for being one of the best known examples of igneous dikes.[1]

B.1.7. General Vegetation

B.1.7.1. General Vegetation - Alternatives

Total Number of Comments: 5

Summary

The BLM should include in the range of alternatives vegetation management actions such as using fire management to achieve desired habitat conditions, using a mix of high-quality native plant species during restoration of disturbed sites, and reducing pinyon-juniper communities to restore native grassland vegetation communities.

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

8. RMEF encourages the BLM to use seed mixes of high quality native plants.

Restoration of disturbed sites, both natural and man-caused, may require seeding or planting for soil stabilization or to create value as forage for wildlife and livestock. We encourage the use

of native plant seed mixes, as well as non-native species that are not invasive. It may also be advisable to use non-native annuals as a nurse crop for native species, if necessary. Seed mixes should strive to achieve historic biodiversity.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

We would also like to emphasize restoration of natural resources to make our public lands more resilient, protect water resources, and improve forest and range health.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

On BLM lands between Buena Vista and Salida, pinyon-juniper woodlands should be reduced and native grasslands should be restored so that more forage is available for livestock and for wildlife.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW is interested in participating in all habitat management processes on BLM lands, including forest, grazing, and fire management plans in order to maintain and/or improve wildlife habitat.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Revegetation with native species will be required.

B.1.7.2. General Vegetation - Baseline Affected Environment

Total Number of Comments: 2

Summary

The BLM should use best available science and the following vegetation management study when developing alternatives and analyzing effects: The Forgotten Stage of Forest Succession: early-successional ecosystems on forest sites, Mark E. Swanson, Jerry F. Franklin, Robert L. Beschta, Charles M. Crisafulli, Dominick A. DellaSala, Richard L. Hutto, David B. Lindenmaver, and Frederick J. Swanson

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara:

Comment Excerpt Text:

We strongly believe that early seral habitat is underrepresented in most habitat types on BLM lands as a result of historic wildfire suppression policy and lack of active management. (Reference, “The Forgotten Stage of Forest Succession: early-successional ecosystems on forest sites,” Mark E. Swanson, Jerry F. Franklin, Robert L. Beschta, Charles M. Crisafulli, Dominick A. DellaSala, Richard L. Hutto, David B. Lindenmaver, and Frederick J. Swanson.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Habitat/Vegetation Management

This section should include a description of fire history & management, various fuels treatments to be applied and benefits of each, and wildlife considerations for various management and treatments.

B.1.8. Riparian and Wetland Vegetation

B.1.8.1. Riparian and Wetland Vegetation - Alternatives

Total Number of Comments: 10

Summary

Commenters suggested several actions the BLM should consider in the range of alternatives, including:

1) development setbacks from streams, lakes, reservoirs, and wetlands that are supported by the most recent science and research to safeguard waterways

2) protections around the remaining wetlands in Park County

3) periodic monitoring of water quality in waterways

4) protections for wetlands, playa lakes, and fens on BLM-administered lands from permitted activities such as grazing, mining, oil and gas development, and water diversions

5) emphasizing "tread lightly" concepts in recreation to protect wetlands and riparian areas in high country areas from over-use

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Commenter1:Sean Ryan

Comment Excerpt Text:

Please safeguard important waterways for fish and wildlife by including development setbacks from streams, lakes, reservoirs and wetlands that are supported by the most recent science and research

Organization1:

Commenter1:Eddie Kockman

Comment Excerpt Text:

Protection of remaining wetlands in Park County is a priority objective.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Setbacks that give reasonable protection against water contamination are a critical requirement, along with periodic monitoring of water quality. The study plan should define these necessary setbacks in each case where a potential oil/gas production operation might exist. The geological formations of the area and sensitivity of the resource should be considered on a case-by-case basis in determining the setback distance.

Commenter1:Eddie Kochman

Comment Excerpt Text:

there are opportunities in the ongoing RMP process to protect not only certain streams, but also wetlands, playa lakes and fens on BLM administered lands under the authority of 3792102 (3) CRS which is administered by the Colorado Water Conservation Board.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

BLM should seek to protect these wetlands from the impacts of certain human activities such as oil and gas leasing, grazing, water diversions, and mining.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends the ECRMP include identification of high value wetlands and aquatic and riparian habitat within the boundaries of ECRMP, and methods for protection of these important habitats.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

IV.SPECIFIC RECOMMENDATIONS FOR AQUATIC SPECIES/AMPHIBIANS

Consult with CDOW or collect baseline aquatic species and macro-invertebrate inventory data both pre and post development.

Conduct two pass population estimations for streams potentially affected. Report species composition, length-frequency and individual weights.

Collect water samples to monitor water quality before, during and after occupation and document data and changes.

Design stream crossings to minimize the tot al number of crossings and so that crossings are at or as near to 90 degrees to the direction of stream flow.

Construct stream crossings "in the dry" and avoid impacts to trout during spawning and hatching periods.

Restrict trucks from crossing streams and utilize appropriate and effective culverts that don't preclude upstream movement of fish.

Avoid using low water crossings.

Control erosion and sedimentation, and manage storm water runoff; reclaim sites as quickly as possible to restore vegetation.

Control weeds along riparian corridors and manage livestock grazing to maintain riparian corridor health.

Consider fencing riparian areas.

Avoid changes to water quality and quantity.

Repair incised channels where excessive erosion and sedimentation is occurring.

Consider directional boring of pipeline crossings of perennial streams.

Replace non-native riparian vegetation such as tamarisk and Russian olive with appropriate native plantings such as cottonwood or willow.

Protect groundwater, riparian areas and wetlands by installing impermeable barriers beneath fluid pits.

When working in quality fisheries disinfect heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond, or wetland prior to moving the equipment to another water body. The disinfection practice should follow this outline:

Remove all mud and debris from equipment and spray/soak equipment with a 1:15 solution of disinfection solution containing the following ingredients:

- Dialkyl dimethyl ammonium chloride, 5- 10% by weight;

- Alkyl dimethyl benzyl ammonium chloride, 5- 10% by weight;

- Nonyl phenol ethoxylate, 5- 10% by weight;

- Sodium sesquicarbonate, 1-5%;

- Ethyl alcohol, 1-5%; and

- Tetrasodium ethylene diaminetetraacetate, 1-5%

- and water, keeping the equipment moist for at least 10 minutes and managing rinsate as a solid waste in accordance with local, county, state, or federal regulations; or

Spray/ soak equipment with water greater than 140 degrees Fahrenheit for at least 10 minutes.

Sanitize water suction hoses and water transportation tanks (using methods described above) and discard rinse water at an appropriately permitted disposal facility.

Avoid stream channel disturbances during fish spawning seasons. Fish spawn at specific times of the year. The eggs incubate in the gravel until the yolk sac is absorbed and the larval fish can swim up through the gravel and into the main body of water. Eggs incubating in the redds can be smothered by the excessive deposition of sediment, and further affected by fungal spores carried in the sediment. Adults can be affected by the same fungal species with high mortality rates. Fish spawning dates and incubation times vary by elevation and temperatures, but in general the following intervals will apply in Colorado:

Rainbow trout: March 1 - June 15

Brown trout: October 1 - May 1

Brook trout: August 15 - May 1

Cutthroat trout: June 1 - September 1

Bluehead sucker: May 1 - July 15

Flannelmouth sucker: April 1 - July 1

Roundtail chub: May 15 - July 15

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Expand stipulations from current controlled surface use to include increased buffers for perennial riparian areas.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

BLM should increase their management strategy for sustaining and protecting these diminishing wetlands and they should not be available for development. Therefore, we offer the following recommendations:

Apply NSO stipulations (including a 500-foot buffer or greater) that preclude all surface disturbances on wetlands as defined by US Fish and Wildlife Service.

Include a full accountability assessment of wetlands within the resource planning area and integrate the management of wetlands through securing their use in water management.

Assess the pressures that wetlands in the planning area might undergo due to the impacts from climate change (which can affect wetland conditions through rising temperatures).

Commenter1:Elisabeth Braun

Comment Excerpt Text:

Preference should be given to plans which would "tread lightly"on high country and riparian environments, thus preventing costly maintenance and remediation due to over use and uninformed use of the land.

B.1.8.2. Riparian and Wetland Vegetation - Baseline Affected Environment

Total Number of Comments: 5

Summary

Commenters provided information on the status of riparian, wetland, and fen habitats that BLM needs to take into consideration. The BLM should be aware that there are several playas (Elkhorn East and West, Bald Hill Lake, and Hartsel Lake) that CWCB has water storage rights on, should describe the unique wetlands, fens, and other riparian environments that are in the South Park (notably High Creek Fen) area, including descriptions of their endemic species of plants and animals, and describe how these riparian/wetland areas contribute to water quality and recharge.

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Commenter1:Eddie Kochman

Comment Excerpt Text:

Park County Commissioners did support recommendations on seven streams and two natural lakes, all on forest lands. Certain ones are candidates for reintroduction of Green Back Cutthroats. They also supported developing a recommendation on the Park County High Creek Fen, along with the Nature Conservancy, who owns the surrounding lands. Jara Johnson at some point will be developing a recommendation for the High Creek Fen for consideration by CWCB. If if it approved and a storage right is eventually granted for the fen it will be a first, not only for Colorado, but the nation.

Commenter1:Eddie Kochman

Comment Excerpt Text:

I want to emphasize that currently there are four playa lakes (Elkhorn East and West, Bald Hill Lake and Hartsel Lake that HAVE WATER STORAGE RIGHTS HELD BY CWCB. The original recommendations were made in the late 70's and were based on "protecting the natural environment to a reasonable degree" which in each case included standing water that was important to a diversity of wildlife (including the mountain plover) and unique vegetation.

Commenter1:Eddie Kochman

Comment Excerpt Text:

I suggest you request information on these four playa lakes from Linda and Jeff and you may want to contact Jara on the status of the High Creek Fen recommendation.

Please consider this email as my comment for the record to the ongoing RMP process. It is applicable not only to BLM lands in Park County, but elsewhere. Such storage rights can be an important tool to protect these important water based habitats in the future.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

South Park contains unique wetlands, including fens, that are a critical environmental resource. These wetlands harbor endemic species of flora and fauna that are found nowhere else in the lower 48 States; they are also important for maintaining water quality and for groundwater recharge.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

South Park also contains some unique and sensitive wetlands, including fens, that constitute a critical environmental resource. They contribute to water quality and groundwater recharge and in addition contain endemic flora and fauna found nowhere else in the lower 48 states. These wetlands are very sensitive to disturbance from oil and gas drilling, grazing, water diversions and other forms of human activity.

B.1.9. Noxious Weeds and Invasive Species

B.1.9.1. Noxious Weeds and Invasive Species - Alternatives

Total Number of Comments: 3

Summary

The BLM needs to consider alternatives that will actively manage landscapes to control and reduce noxious weeds, especially on native ranges, through the use of landscape plans and integrated weed management tools (biological controls, mechanical options, chemical treatments, and education). The BLM should include a comprehensive weed control plan for all known noxious weeds and should include an invasive species and aquatic nuisance species control plan for all known species.

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF encourages the BLM to actively manage landscapes to control and reduce noxious weeds.

RMEF is deeply concerned about the spread of noxious weeds and their negative effects on habitat. An essential element of restoration efforts is reducing the impact of noxious weeds on native ranges. Native plant communities provide the highest nutritional value for a variety of wildlife species, and non-native plant species invade and threaten our public lands. Where knapweed, leafy spurge, or other noxious weeds take over, the health and diversity of native plant communities suffer, and forage for elk, other wildlife, and livestock is greatly diminished. The RMEF encourages the BLM to address the scourge of noxious weeds with landscape plans and integrated weed management tools (biological controls, mechanical options, chemical treatments, and education). Follow up monitoring will be extremely important to habitat health.

Commenter1:Dan Murray

Comment Excerpt Text:

Fight noxious weeks

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County will require weed management plan for the management and prevention of noxious weeds. Lessees must eradicate any invasion.

B.1.9.2. Noxious Weeds and Invasive Species - Baseline Affected Environment

Total Number of Comments: 1

Summary

The BLM should include inventory and maps showing the extent of all known noxious weeds, invasive species, and aquatic nuisance species as part of the baseline information.

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Inventory and maps showing extent of all known noxious weeds, invasive species, and aquatic nuisance species. Include a comprehensive weed control plan for all known noxious weeds. Include an invasive species and aquatic nuisance species control plan for all known species.

B.1.9.3. Noxious Weeds and Invasive Species - Impacts

Total Number of Comments: 2

Summary

Commenters described various effects commonly seen with the spread and presence of noxious and invasive weeds and pests. They cost time and money to control and have destroyed native habitats. They are frequently spread through the expansion of road networks, and by controlling roads, the BLM will control invasive species and benefit native pollinators and native plant seed production. The BLM should include remediation measures, including education programs, to address effects.

See Section, 2.3.1.6, Vegetation, including Riparian Areas and Invasive Species (p. 21)

Commenter1:Mark Ferrell

Comment Excerpt Text:

I have worked with BLM, forest service, weed and pest districts and other land managers for many years in controlling invasive weeds on our public lands. Wherever there is dist urbance unwanted invasive species such as leafy spurge, knapweeds, Russian thistle, kochia, Canada thistle, salt cedar, hounds tongue, western sticktight, wild licorice, downy brome and many other species find a foot hold. Each year they cost tax payers as well as farmers and ranchers millions of dollars to control. Unwanted mechanized vehicles destroy pristine habit at therefore encouraging invasive species. They usually do not follow established trails and continue to make new ones.

My wife and I are also avid mountain bikers, rock climbers, trail runners and users of our great out doors. We and ot her like us follow established trails, avoid them when they are wet and respect our great out doors. Anyone who has been on the Monarch Crest Trail knows the damage motorcycles can cause to a trail system.

Commenter1:Peter O'Brien

Comment Excerpt Text:

I would like the BLM to consider the past and present effects of all types of roads on the vegetation in Colorado. I am mostly familiar with the lands in Huerfano County including The Sangre de Christo and Wet Mountains. Not only are huge numbers of non-native plants present in the agricultural valleys but they are quite numerous in most of the higher elevations that I have visited. Consequently effects on the invertabrate and animal populations are apparent. This summer I have observed numerous wildflower species that have flowered but failed to set seed. I suspect that the decline in pollinator populations is contributing to this effect. I have read that roads provide one of the main vectors to the decline of native populations including the spread of noxious and non-native plants and therefor the decline of productivity of our ecosystems. I urge BLM to make the preservation of existing large roadless areas a high priority in the new ECRMP. I would also like to see some ideas about ways to remediate existing conditions in vegetation patterns. I also think the ECRMP should consider outreach education programs for the general public on these management issues. I would also like to see easy public access to natural science data collected on the public lands.

B.1.10. General Fish and Wildlife

B.1.10.1. General Fish and Wildlife - Alternatives

Total Number of Comments: 38

Summary

The BLM should work with Colorado Parks and Wildlife to inventory and catalogue key fish and wildlife habitats within the planning area, and then institute clear goals and allocations to protect, conserve, enhance, and restore those habitats. All management direction for wildlife should include well-defined measurable standards, science-based tools to evaluate standards, and consistent implementation of standards. BLM should protect wildlife values or restrict uses through designations and authorities/protections (e.g., lands with wilderness characteristics).

Large areas of unfragmented wildlife habitat should be protected, and development activities should be located, phased, and concentrated to minimize disturbance of wildlife and wildlife habitat. The BLM should allow minimal surface disturbance and avoid critical wildlife habitat, wildlife migration corridors, and plant species of concern. Current oil and gas stipulations are needed to protect wildlife habitat. Lessees should be required to follow the reclamation-related actions to minimize adverse impacts to wildlife that are recommended by Colorado Parks and Wildlife. Commenters provided specific recommendations for wildlife corridor protection and for wild bighorn sheep and mule deer habitat management, including:

- Management of habitat at the landscape scale to ensure the appropriate combination of cover, access, and topography to support elk habitat and healthy elk populations
- Designation of priority species and priority habitats, including elk as a priority species and elk habitat as priority habitat
- Protection of important bighorn sheep habitats, including lambing areas, migration corridors, wintering areas, watering areas, and escape terrain, in close coordination with CPW managers
- Protection from domestic livestock grazing through risk analysis using the best available science, which is currently the Risk of Contact Tool
- Restrictions on the use of domestic pack goats in bighorn sheep habitat
- Incorporation of the Western Association of Fish and Wildlife Agencies Mule Deer Working Group guidelines and conservation plan
- Protection of deer winter concentration area west of Trinidad and bighorn sheep habitat in the Upper Arkansas Valley from development with an NSO stipulation
- Consideration of no surface occupancy stipulations in ACECs or MLP areas
- Review of current studies and literature to assess new BMPs and stipulations that protect big game habitat, including review of timing limitations

Additional species that should be given special consideration in the RMP include habitat for native fish and aquatic species, raptors, and bats.

See Section 2.3.1.7, General Fish and Wildlife (p. 22)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF requests that the BLM designate elk as a “Priority Species” and elk habitat as “Priority Habitat” in all affected BLM planning documents.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

BLM plans should set direction as to how large landscapes (e.g., watersheds or state wildlife management units) will be managed for combinations of cover, access, and topography to meet state wildlife agency population goals for elk harvest, and to enhance elk hunting opportunities. To be most effective, this direction should be developed cooperatively with state wildlife agencies.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Where compatible, active wildlife habitat treatments and recreational access should be fully supported on lands within National Monuments, National Conservation Areas, Wilderness Study Areas, etc.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Designate elk as a “Priority Species” and elk habitat as “Priority Habitat” in all affected BLM planning documents. Planning documents should provide specific direction for managing elk habitat and supporting healthy elk populations.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

BLM Land Use Plans and other planning documents should provide specific direction for managing “priority” elk habitat and supporting “priority” elk populations. Management direction should be quantified, so its effectiveness can be clearly demonstrated and monitored. BLM’s Fish and Wildlife Conservation Manual 6500 (Section 1.4, Part G, Item #7, Pages 7-8) supports this recommendation by identifying BLM State Directors as responsible for “Ensuring that land use plans and subsequent implementation-level plans within their states identify desired outcomes,

strategies, restoration opportunities, use restrictions, and management actions necessary to conserve and/or recover listed species and provide for the conservation of BLMsensitive species, priority species and/or habitats, and other fish and wildlife resources that occur on BLM-administered public lands."

Commenter1:Sean Ryan

Comment Excerpt Text:

Please support big game population objectives set by Colorado Parks and Wildlife by safeguarding public lands habitat in the face of development; especially focusing on crucial habitat for mule deer, bighorn sheep, elk and wild trout.

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

To protect these fisheries, we recommend that the MLP:

· Expressly aim to: (1) maintain the habitability of the fishing waters in the planning area; and (2) avoid impairing or disturbing the recreational experience of fishermen and women

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Include special protections for other elk, deer and pronghorn winter range and concentration areas outside of the Reinecker Ridge area;

Commenter1:Janis Frazee

Comment Excerpt Text:

Comment related to Arkansas canyon lands, lands surrounding Browns canyon, South Park and other wild lands in your management area

I feel that it is important to protect the wildlife in this area from develoment that compromises what other species call home.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

BLM should ensure that it protects open space that provides critical habitat, migratory routes and calving/breeding/roosting areas for elk, mule deer, pronghorn, bighorn sheep, mountain plover and many other species.

Protection measures might include:

- Setbacks from surface water bodies
- Limiting oil and gas activity during winter months in elk wintering areas and other sensitive areas.
- protecting some lands by excluding them from energy development

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

Colorado is fortunate to have some native and rehabilitated prairie lands still intact. Unfortunately much of these lands are flat or gently rolling, which makes it easier to build roads, pipelines, processing facilities, etc. These lands are just as valuable for wildlife as the more spectacular mountain areas; in addition, many species of native prairie birds are suffering population declines. We urge the BLM to look at sustaining significant areas of unfragmented habitat – by keeping new roads and pipelines to a minimum, using existing infrastructure and designating some areas off-limits to oil and gas leasing.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

There are a number of raptor species that are a priority for CPW. Therefore, CPW is concerned about the impacts of energy development, military training, and recreation on nesting raptors on BLM lands or mineral estate. These ongoing or recurring activities could result in disturbance and/or abandonment by nesting raptors. Seasonal use restrictions and buffers around occupied nest sites will benefit the viability of the species. It is also important to protect unoccupied nests sites where nesting habitat is limited or when protecting species that do not necessarily nest every year. Energy development, military training, and recreation may also impact raptors in habitat conducive to hunting and roosting. These activities can impact raptors through exploitation, disturbance, habitat modification, and pollution.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

There are several bat species that are listed as high priority species for CPW. Threats to bat populations include roost disturbance, habitat loss/fragmentation, water quality degradation, and white-nose syndrome. Bat habitat on BLM lands is diverse and can include grasslands, forested areas, caves/ mines, cliff I crevice features, and riparian/wetland areas. Direct, indirect, and cumulative impacts have the potential to negatively affect bat populations if careful resource management planning is not implemented. CPW recommends protection and avoidance of quality bat roosts and foraging areas when planning resource management. This includes significant roost sites (ie. day roosts, night roosts, maternity roost s, hibernacula, and bachelor roosts), foraging areas, and water sources. Thirteen of Colorado's 17 bat species use abandoned mines to some degree. Mines are highly utilized by Townsend's big-eared bat (Corynorhinus townsendii) a

Species of Concern in Colorado. When mine closures are necessary for human health and safety, the closures should be preceded by bat surveys and only non-destructive closures should occur at significant bat roost sites.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW is concerned that the ECRMP include adequate plans and measures for management of aquatic habitats to protect native fish and aquatic species.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW has a statutory responsibility to manage all wildlife species in Colorado; as such we encourage the BLM to afford the highest protection for Colorado's wildlife species and habitats through the RMP revision process.

Commenter1:Jay Gingrich

Comment Excerpt Text:

Wildlife must travel long distances during daily and annual movements. These wild connections are extremely important and must be considered on a priority basis on all land use decisions and studies.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Increased management strategies and implementation should be given to native trout fisheries within the planning area.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

We recommend a review of the current studies and literature to assess new BMPs and stipulations that protect important big game habitat.

Included in this review should be a reassessment of how timing limitations are being implemented. Current research in Wyoming illustrates that timing limitations do not protect wildlife habitat and are ineffective, leading the Wyoming Game and Fish Department to consider removing timing limitations in crucial winter habitat[2. Wyoming Game and Fish Department. 2015. Personal communication with Rick Huber, Habitat Biologist, Cheyenne, Wyoming regarding the

new management guidelines being considered and recommended for implementation in the Rock Springs BLM Field Office and the Rawlins BLM Field Office. Instead of placing timing limitations in crucial winter range, these high value areas are under consideration as off limits to development; instead, other less vital areas are open for development while implementing workable management incentives for industry.].

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

The use of phased and clustered development, while maintaining connectivity and migration corridor integrity, should be utilized for all development on winter range. BLM, with input from CPW, should assess a percentage of important habitat that is functionally required and which should be unoccupied from development at any given time in order to protect the populations stability and Colorado's hunting legacy.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Big game production and parturition areas should be protected for the sustainability of Colorado's big game herds. Disturbance to big game survival during calving and fawning seasons are well document. Closing areas that are important production areas ensures healthy fawns and calves with minimal intrusions as they develop. Production areas should be inventoried, updated, and defined as closed from development from May 1st to June 30th.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

BLM should require lessees to follow the reclamation-related actions to minimize adverse impacts to wildlife that are recommended by Colorado Parks and Wildlife (CPW 2012).

Although this document was developed in relation to oil and gas development, it is useful to apply it to other surface disturbing activities.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County incorporates by reference the specific wildlife stipulations and protections in pages 15 - 17 and Figure 1 of the MLP comment letter of July 9, 2015. The same areas ofNSO stipulations and No Leasing and Enhanced BMPs should apply to all surface disturbing activities. Additional areas outside the MLP boundary that require wildlife protection include elk habitat east of the MLP area, and bighorn sheep habitat on the western edge of Park County at the Lake County

boundary. Park County would like to tailor the Enhanced BMPs as the RMP proceeds, including input from CWF, NWF and CPW/DNR.

All stipulations and BMPs should have no waivers or modifications

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The existing stipulations related to wildlife identified in the RGFO RMP and the South Park Plan Amendment should be modified as needed and applied to BLM lands within the proposed RMP area

- Timing Limitation requirements for any necessary construction near river courses should be used to avoid critical spawning times.
- BLM should evaluate (in conjunction with CPW) the presence of, and opportunity to restore, native trout within the planning area. Those streams that are found to contain native trout or that are suitable for restoring populations of native trout should be afforded a ¼ mile NSO protection for cutthroat trout bearing streams and/or streams identified for reintroduction for cutthroat trout.
- Noise generating activities should be minimized through the application of BMPs to helpreduce impacts to wildlife habitat.
- Any new utility corridors should be located outside critical wildlife habitat and migration areas.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Require minimal surface disturbance, and avoid critical wildlife habitat, wildlife migration corridors, and plant species of special concern.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

It is essential to protect intact large areas of currently unfragmented, undisturbed wildlife habitat. All development and production activities should be located, phased and concentrated to minimize disturbance or displacement of wildlife.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

As to Wildlife, the same areas of BLM lands in South Park that CWF and NWF recommend in the MLP section of this letter for No Leasing, No Surface Occupancy, and Enhanced BMPs, respectively, also should apply to all other surface disturbing activities on BLM lands in South Park. The recommended Enhanced BMPs are in the context of oil and gas exploration and development for the MLP, and will need to be tailored to address the other various activities addressed in the RMP.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Additional areas outside the MLP boundary in Park County that require wildlife protection include:

- Elk habitat east of the MLP area. We propose Enhanced BMPs for this area.
- Bighorn sheep habitat on the western edge of Park County at the Lake County boundary. We propose that this area be designated as no surface occupancy.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Outside of Park County, CWF and NWF request that bighorn sheep on BLM lands in the Upper Arkansas Valley be protected with No Surface Occupancy buffers from development.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

In addition, there are deer winter concentration areas on BLM-managed surface acres west of Trinidad. Our concern is that in the Reasonable Foreseeable Development forecast prepared by the Royal Gorge Field Office in 2012 there is a high potential for coalbed natural gas development in this area. CWF believes it is necessary that this key habitat not be subject to surface disturbance from such potential future development.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

The BLM should ensure wildlife and habitat is fully considered in the RMP. Designations and management prescriptions must protect crucial habitat including important wildlife corridors

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The effective application of science to land management planning and decision-making requires three "essential ingredients":

- Well-defined, measurable standards (e.g. wildlife population or habitat condition targets), developed via robust public involvement processes
- The employment of science-based analytical tools to evaluate compliance with the standards (e.g. population viability analysis, or the spatially explicit Decision Support System recommended by the Western Governors' Association)
- Consistent implementation of science-based analysis and decision-making (i.e. dedicated funding for monitoring and science-based adaptive management processes) Rohlf, D.J. 2004. The Eastern Colorado RMP should consider these essential elements as it moves forward with efforts to respond to the pressing land management challenges of the coming decades.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

To appropriately designate and protect wildlife corridors within the Royal Gorge Field Office, BLM should:

- collaborate with other state and federal agencies and non-governmental groups to obtain current data regarding crucial wildlife habitat and corridors;

- connect already designated wilderness areas and other reserves to ensure that wildlife populations have the ability to easily move between large areas of protected crucial habitat;
- identify species that will act as focal species for identifying important wildlife corridors and will also act as indicators for how well the wildlife corridors are working;
- use the best available science to decide upon the exact areas to be designated and protected;
- ensure that all designations include specific provisions regarding management so that designated wildlife corridors are protected and can function as designed; and
- constantly monitor the effectiveness of designated wildlife corridors and implement adaptive ecosystem management strategies.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We've identified the following areas as harboring important wildlife values that merit special attention in the Eastern Colorado RMP. BLM should evaluate managing these areas as Wildlife Emphasis Areas and put appropriate management prescriptions in place to protect wildlife resources. We have included GIS data for these areas in Appendix F.

(i) Cache Creek Granite West

Values:

-Adjacent to Elk Mountain-Collegiate North Roadless Area

-Most of contiguous USFS land is managed as 5B areas for Big Game Winter Range

-Elk production area, winter concentration area, migration corridor

-Mule Deer winter concentration area

-Small segment of High Biodiversity significance Cache Creek CNHP PCA

Proposed Management:

-Restrict motorized and mechanized use to designated routes.

-Seasonal closure of most designated routes Dec 1-April 30.

-Seasonally closed Administrative/permitted plowed roads are gated and closed to public use.

-Restrict OSV use to a limited number of designated routes, for administrative/permit access only (the area does not currently receive much OSV use).

-The Colorado Trail passes through the western segment of this area. Eliminate motorized use that is occurring in this area and on this trail.

-Concentrate ground disturbing recreational mining activity outside of the elk production area until July 1.

-Part of this unit is within the Clear Creek Lynx linkage area #22. Suitable cover and forested areas should be maintained in this area.

(ii) Dry Union

Values:

- Elk production area, elk and mule deer winter concentration area.
- Elk migration area.
- Adjacent to the 3276 acre CPW Moyer 45 Bar Ranch State Habitat Area.

Proposed Management:

- Actively manage the area, placing management emphasis on conserving, restoring, maintaining or enhancing intact and unfragmented habitats that provide security and escape for elk and mule deer. Prohibit surface occupancy and surface-disturbing activities in elk production areas year-round.
- Close to public motorized and mechanized travel except on designated CR 7 and connection to USFS Road 111.

- Seasonal closure to public motorized and mechanized use on all routes except CR 7: Dec 1-June 30 to protect wintering wildlife and elk calving area. Install and maintain locked gates.
- Install locked gate to close road to public use east of CR 7 at 39°10'0.79"N 106°18'23.76"W, and lock existing gate at USFS boundary at 39° 9'51.77"N 106°17'29.53"W to close route to public use and prevent unauthorized use on USFS land to the east (keep as administrative route)
- No new route development or surface disturbance.
- No public OSV use allowed.

(iii) Granite Clear Creek Reservoir

Values:

- Shares 2.2 miles of boundary with the Buffalo Peaks West Colorado Roadless Area
- All Contiguous USFS lands are managed as 5B areas for Big Game Winter Range
- Shares boundary with the CPW Granite State Wildlife Area along the Arkansas River.
- Bighorn Sheep production area; winter and summer concentration area; migration corridor
- Elk winter concentration area; part of an elk production area and migration corridor
- Mule Deer winter concentration area; migration corridor
- Lynx linkage area
- CNHP PCAs within the boundary:

*Very High Biodiversity Significance Arkansas River at Pine Creek. This site supports a good (B-ranked) occurrence of a globally imperiled (G2/S2) Pinus ponderosa / Alnus incana woodland. Lower montane woodland ecological systems occupy less than 1% of the Southern Rocky Mountains ecoregion and the Pinus ponderosa / Alnus incana association has been known only from the Front Range of Colorado. There is also a good (B-ranked) occurrence of a globally vulnerable (G3/S3) Populus tremuloides / Alnus incana montane riparian forest, a good (B-ranked) occurrence of a globally vulnerable (G3/S3) Picea pungens / Alnus incana montane riparian forest and a fair (C-ranked) occurrence of a globally vulnerable (G3/S2) Populus angustifolia - Pseudotsuga menziesii montane riparian forest.

*High Biodiversity Significance Hayden Gulch. The site supports a good to fair (BC-ranked) and an extant occurrence of the globally imperiled (G2/S2) Crandall's rock-cress (Boechera crandallii).

*High Biodiversity Significance Low Pass Gulch at Arkansas River. Site contains a good (Branked) occurrences of two globally rare plant communities, the globally vulnerable (G3/S3) Salix geyeriana / Carex aquatilis willow carr and the globally vulnerable (G3/S2) Picea pungens / Equisetum arvense montane riparian forest.

*High Biodiversity Significance Sawmill Gulch. This site supports a good (B-ranked) occurrence of a globally vulnerable (G3/S3) Salix geyeriana – Salix monticola / mesic forbs shrubland, a good (B-ranked) occurrence of a globally vulnerable (G3/S3) Salix monticola / Carex aquatilis montane riparian willow carr and a good (B-ranked) occurrence of a globally vulnerable (G3G4/SU) Populus tremuloides / Salix drummondiana forest.

Proposed Management:

- Restrict motorized and mechanized use to a limited system of designated routes
- Seasonal closure of most designated routes Dec 1-April 30
- Seasonally closed Administrative/permitted plowed roads are gated and closed to public use.
- Restrict OSV use to a limited number of designated routes, for administrative/permit access only (the area does not currently receive much OSV use)
- Part of this unit is within the Clear Creek Lynx linkage area #22. Suitable cover and forested areas should be maintained in this area.
- Administrative/permit roads should exclude public access with locked gates.
- Do not permit use of any designated routes in Bighorn Production Areas May 1- June 30

(iv) Mount Zion

Values:

- Very important lands for the Mt. Zion elk herd. This is a Winter Concentration Area used heavily by elk for cover and as a corridor to access water and forage on adjacent private land.
- Elk also use the BLM land on the south side of Highway 24 as a migration corridor. These lands connect to undeveloped open space as part of the Grand West private land subdivision to the west. Elk will often use this migration corridor throughout the winter, depending on snow depth and severity of the winter.
- The 40 and 18 acre inholdings of BLM land immediately SW of this area, downstream along the Arkansas River, should be managed as part of this migration corridor and wildlife area. As development of private lands south of the river continues, a traditional migration corridor is being lost.
- BLM lands receive some dispersed camping and OHV use in the summer. Unauthorized routes are proliferating in this area, as well as trash dumping, tree damage, etc. These routes are also obliterating forage and vegetation.
- CPW has identified this area as part of a very high priority lynx linkage.

Proposed Management:

- Should exclude winter vehicle use (OSV and OHV) Dec 1- May 1. Adjacent forest lands exclude OSV use. Perhaps permit OSV use only on the Mt. Zion road. Do not develop or plow a winter parking/staging area off Highway 24.
- Motorized and mechanized must be restricted to designated routes, and the number of designated routes must be reduced. Summer camping should be restricted to a few designated sites near road 109.

(v) Mount Shavano

Values:

- Contains CPW identified Mule deer and elk summer and winter range and winter concentration areas.
- Overlaps with Droney Gulch ACEC.
- Adjacent to Droney Gulch State Wildlife area.

Proposed Management:

- Restrict motorized and mechanized use to designated routes.
- Seasonal public closure of routes to wheeled vehicles December 1-April 15
- OSV use limited to Road 250
- Reduce habitat fragmentation by reducing road density (focusing primarily on duplicative or redundant routes) in this area. Route density of less than 0.5 miles of road per square mile preferred, where this cannot be achieved implement winter closures if feasible to seasonally limit route related disturbance in the most critical months.
- All routes by road 250 should be seasonally closed Dec 1-April 1 or until mud season is over.
- Consider only permitting administrative/special use permitted motorized and mechanized use on the loop route south of road 250. Manage this primarily as a non-mechanized horse trail, as this is the predominant recreational user group in this area.
- Move toward designation of dispersed motorized camp sites.

(vi) Pass Creek

Values:

- Contains CPW identified Elk Production area land.
- Mule deer and elk summer and winter range and winter concentration areas.
- The area supports one excellent (A-ranked), one good (B-ranked), one good to fair (BC-ranked) and one extant occurrence of the globally imperiled (G2/S2) Crandall's rock-cress (Boechera crandallii). Also a good (B-ranked) occurrence of a globally imperiled (G2G3/S2S3) montane riparian forest (Populus angustifolia - Juniperus scopulorum) along Pass Creek.
- Scenic viewshed from highway and neighboring communities
- Adjacent USFS land is a 5B management prescription area managed for big game winter range.
- Adjacent to Chipeta Roadless area.

Proposed Management:

- Seasonal public closure of routes to wheeled vehicles December 1-April 15.
- OSV use restricted to designated route along Greens Creek road.
- Preserve scenic viewscape

- Restrict motorized use to a few sustainable designated routes.
- Close steep, unsustainable route south of the big Douglas Fir.

Recommendations: BLM should evaluate the above areas, and any other important wildlife habitat areas identified by BLM or the public, for management as Wildlife Emphasis Areas. The Eastern Colorado RMP should manage Wildlife Emphasis Areas such that more management emphasis is placed on protection and enhancement of the wildlife resource.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

In addition to the MLP area, the BLM should work with Colorado Parks and Wildlife to inventory and catalogue key fish and wildlife habitats within the planning area, and then institute clear goals and allocations to protect, conserve, enhance and restore those habitats. This includes migration, stopover, wintering, summering, calving/fawning and other important habitats for fish and wildlife species, including, but not limited to, mule deer, bighorn sheep, elk, pronghorn antelope, native and wild trout and game birds.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

We also strongly recommend that all BLM utilize the following Western Association of Fish and Wildlife Agencies Mule Deer Working Group guidelines when developing the final RMP revisions, amendments and implementation: 1) Energy Development Guidelines for Mule Deer, 2) North American Mule Deer Conservation Plan, and 3) Habitat Guidelines for Mule Deer (developed for 7 different regions).

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

In 2011 hunting and fishing in Colorado accounted for $1.3 billion in direct expenditures, supported 18,743 jobs and generated $134 million in state and local tax revenue. For this economic activity to remain strong in Colorado, intact and undeveloped public lands must be managed in a way that promotes their long-term conservation and continued use by hunters and anglers.

Organization1:Rocky Mountain Bighorn Society

Commenter1:Terry Meyers

Comment Excerpt Text:

In summary, we would like to see the following measures included in the preferred alternative of the draft RMP:

Protection of important bighorn sheep habitats, including lambing areas, migration corridors, wintering areas, watering areas, and escape terrain, in close coordination with CPW managers

Protection from domestic livestock grazing through risk analysis using the best available science, currently the Risk of Contact Tool

Restrictions on the use of domestic pack goats in bighorn sheep habitat

Organization1:Rocky Mountain Bighorn Society

Commenter1:Terry Meyers

Comment Excerpt Text:

In order to ensure viable populations bighorn sheep remain well-distributed across the ECRMA, land managers must be vigilant in ensuring that critical habitats such as lambing areas, wintering areas, migration corridors, watering areas and escape terrain are not negatively impacted by development of recreational access and facilities, natural resource extraction and special events. Suitable management actions may include, but are not limited to, seasonal or permanent closures of recreational or motorized access, permanent protective designations for critical habitat areas, and reduction or redistribution of livestock grazing permits. The BLM should work closely with Colorado Parks and Wildlife (CPW) managers to identify these areas of importance.

B.1.10.2. General Fish and Wildlife - Baseline Affected Environment

Total Number of Comments: 24

Summary

Habitat for the following species is known to occur in the planning area: native cutthroat trout, black bear, elk, pronghorn, mule deer, mountain lion, Abert's squirrel, Brazil free-tailed bat, Gunnison's prairie dog, bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and great blue heron.

The BLM should incorporate updated wildlife and wildlife habitat information and geospatial data using the following potential sources:

- State Wildlife Action Plans
- Western Governors Association Crucial Habitat Assessment Tools
- M.A.P. habitat data
- Colorado Parks and Wildlife elk habitat data
- Rocky Mountain Wild's Assessment of Biological Impact: http://rockymountainwild.org/programlist/
- The Starkey Project: A Synthesis of Long-Term Studies of Elk and Mule Deer. Alliance Communications Group, 2005

Specific areas of important wildlife habitat were provided by commenters, as well as references to support wildlife habitat information, including those related to wildlife corridors, habitat fragmentation, and climate change.

See Section 2.3.1.7, General Fish and Wildlife (p. 22)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

BLM should incorporate up-to-date wildlife and wildlife habitat geospatial data to identify important local and regional wildlife habitat resources and analyze impacts from proposed actions. Current wildlife habitat data are most readily available from State Wildlife Action Plans (SWAPs) and Western Governors Association Crucial Habitat Assessment Tools (CHATs).

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF updated our maps in 2014 with data from the state wildlife agencies. To be consistent, RMEF data now depicts only elk habitat rather than the seasonal ranges in all states. We encourage the BLM to use the M.A.P. habitat data in plan revisions. The map data are available from the state wildlife agencies or from RMEF.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Much has been learned about elk habitat requirements from the past 25 years of research from the Starkey Project and other studies. These findings can be used as a foundation for establishing BLM's prescriptive management direction. (Reference, The Starkey Project: A Synthesis of Long-Term Studies of Elk and Mule Deer. Alliance Communications Group, 2005.) The developing elk models that emphasize the importance of summer nutrition, distance to roads, distance to cover, and slope all provide an excellent tool for future management of public lands in elk country.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Mapping data for both wildlife species and habitat throughout Park County produced by CPW will be especially important. One example includes updated information on location and status of wetlands throughout Park County.

Commenter1:Audrey Wheeler

Comment Excerpt Text:

There is habitat for black bear, elk, pronghorn, mule deer, mountain lion, Alberts squirrel, Brazil freetailed bat, Gunnison's prairie dog, bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and Great Blue heron. The prairie dog is a species of most concern according to the Fish and Wildlife service.

Commenter1:Eddie Soto

Comment Excerpt Text:

The land surrounding Thompson Mountain/Gribble/Twin Mountain serves as an important corridor for the area's wildlife and therefore should be off limits to oil and gas development, mining, mechanized logging, and other forms of human development. This area supports habitat for black bear, elk, mule deer, pronghorn, mountain lion, Albert squirrel, Brazil free tailed bat a Colorado state ranked critically imperiled species, and the Gunnison's prairie dog a species of most concern as identified by the US Wildlife Conservation and Restoration Program's (WCRP) Comprehensive Wildlife Conservation Strategy (CWCS). If you're surprised to learn that any of the aforementioned species can be found within this area, I encourage you to look at Rocky Mountain Wild's (RMW) Assessment of Biological Impact (ABI) for the area which can be accessed here: http://rockymountainwild.org/programlist/gis/abiscreen

Commenter1:Gregg Grant

Comment Excerpt Text:

What sort of study can be conducted to anticipate changes in wildlife needs over the course of the 20 years covered by the plan?

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

In the 1996 Royal Gorge RMP, the Arkansas River subregion was identified as containing significant and high value fisheries habitat and critical wildlife habitat. The Record of Decision (ROD) dictated that where conflicts existed between fishery habitat and other values, decisions would be made in favor of fishery habitat. We support the BLM continuing this management directive

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Native cutthroat trout (Greenback and Colorado River cutthroat trout) occur within the Royal Gorge planning area—referred to as a green lineage and the Bear Creek lineage[1. U.S. Fish and Wildlife Service, Region 6. 2014. Final Summary Report: Greenback Cutthroat Trout Genetics and Meristic Studies Facilitated Expert Panel Workshop. Prepared for US Fish and Wildlife Service, Region 6, Mountain-Prairie Region, Ecological Services, Colorado Field Office, Lakewood, CO. May 12, 2014.]-- in the Arkansas and South Platte River basins.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

the planning area does include several drainages that contain cutthroat trout (Map A. Royal Gorge/Eastern Colorado resource planning area under the new revision planning process. Map includes important rivers and streams and special designations. See comment letter for map.) and are identified as being suitable for cutthroat trout reintroduction. In particular, Colorado Parks and Wildlife (CPW) has identified several streams suitable for reintroducing native cutthroat trout.

Commenter1:Misi Ballard

Comment Excerpt Text:

The lands are also critically important to migrating wildlife and provide important winter range and calving areas, important for herd health, hunting interests and a strong local economy.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Wildlife species present in the four areas that need to be considered in Eastern Colorado RMP are: Raptor nests

Big Horn Sheep lambing and summer and winter range

Landscape connector for big horn sheep linking Pony and Hungry Gulch and other summer range east of Fourmile Creek to sheep habitat to the west

Elk and mule deer

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Critical big horn sheep movement corridor :

Recent CPW data shows an increase in sheep movement back and forth across the Four Mile Creek area south of Booger Red Hills moving between Sheep Creek Gulch NW of High Park Highway 11, Bare Hills, and Rice Gulch south of State Section 16,¬¬¬east across Four Mile creek to sheep summer range in Hungry Gulch and Pony Gulch, as well as across the Shelf Road to steep terrain to the east and towards Pisgah Peak. They using as well the rocky cliffs along Wilson Creek and Mitre Mt., as well as moving south to Milsap Creek, North and East Forks and more recently even further south where sheep have been spotted in the Cooper Mt area. The trail that crosses this movement corridor south of Booger Red Hill is currently designated as horse hiking only and needs to be kept that way.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

D. Less steep Usable terrain

Many wildlife species, like humans, cannot maintain certain life cycle functions on slopes of more than a certain grade. So little level terrain exists in the core areas listed above that RMRI recommends the RMP use GIS mapping to identify usable terrain available for ungulate and other mammal species in the area. They are rare. More gentle slopes such as those found in the Gulches and Deer Haven are especially important to protect from trail development because of their rarity on Gold Belt public lands. Especially since these areas are the last refuge for wildlife displaced from surrounding human development.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The rate of land use change across the conterminous United States has been, and is projected to continue increasing into the future. These changes are resulting in habitat fragmentation, loss of biodiversity, and are negatively impacting sensitive habitats and important ecological processes. Theobald 2010; Theobald et al. 2011. The effects of anthropogenic changes upon landscapes are no longer explicitly localized, rather the scale, speed of change, and subsequent impacts are

having increasingly pronounced consequences at regional and global scales. Foley et al. 2005. Significant shifts in climate and climate change velocity are changing public lands, and the effects have been reliably modeled and observed across the United States. Loarie et al. 2009; Dobrowski et al. 2013. Specifically in the Southwest region, broad scientific consensus supports an imminent shift in climate towards increasing seasonal temperatures and a significant reduction of annual precipitation, resulting in an increasingly arid climate with prolonged periods of drought. Seager et al. 2007.

These changes in climate and land use patterns are projected to continue causing an increase in habitat fragmentation and shifts in the distribution of plants, animals, and ecological processes across local, regional, and global scales. Opdam and Wascher 2004; Loarie et al. 2009; Dobrowski et al. 2013; Ordonez et al. 2014. At the global scale, species migration and shifts in habitat range that match climate change projections have been empirically observed. Parmesan and Yohe 2003; Parmesan 2006. At a regional level, biodiversity in the Southwest, including Colorado, are modeled to undergo significant shifts in plant distributions. It is expected that grass communities will expand and dominate in lower elevations, as the distribution of forested communities will migrate to higher elevations and potentially occupy smaller, favorable areas of refugia. Notaro et al. 2012.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

A networked, connected, and dynamic regional system of protected areas will provide the greatest conservation benefit as single species conservation programs may become too costly, administratively complicated, and ultimately unsuccessful in the face of unpredictable, site-specific landscape and climate driven change. Opdam and Wascher 2004. The regional approach to land conservation management, drawing from biogeography and landscape ecology, have great implications for understanding the importance of incorporating different ecological scales (single species vs. multiple ecosystems) at which biodiversity conservation will be most successful. Simberloff 1998.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Intermountain West contains a wide range of ecosystems that remain ecologically intact and biologically diverse. The native species these ecosystems support and the life support services they provide are crucial for western economies and quality of life, but the balance between natural systems and human use is fragile and increasingly at risk from habitat fragmentation and development of previously undisturbed areas. Reduction in habitat connectivity through increased fragmentation from roads, residential and commercial development, energy development, and

off-road vehicles substantially decreases the amount of ecologically intact core habitat available for many wildlife species.

Ecologists have long recognized that the loss of core habitat and habitat connectivity pose the greatest threats to species persistence and overall biodiversity. Wildlife species also face a changing climate. Scientists generally agree that anthropogenic climate change will drastically affect many wildlife species, and may pose a significant threat to the persistence of some species. Scientists cannot predict the precise responses of wildlife to climate change but many studies do conclude that the habitat ranges of some species will change, indicating the need for a landscape that wildlife can easily traverse in order to adapt to a changing climate. The consensus among conservation biologists and land managers is that wildlife corridors may be the strongest tool for protecting vital wildlife habitats and migration routes threatened by fragmentation and climate change. Heller and Zavaleta 2009.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Mule deer from the eastern portion of the Arkansas River drainage winter extensively in both the Cooper Mountain and Eightmile Mountain proposed BCAs. Both proposed BCAs lie within GMU 581 and consistently provide hunting opportunities for mule deer. In 2012 this GMU provided 721 hunters with a harvest of 370 animals and over 3,000 recreation days. Both proposed BCAs also provide vital winter range for elk. In 2012 roughly 2,000 hunters harvested 192 elk and enjoyed over 10,800 total recreation days in GMU 581.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Arkansas River Drainage South (east of Salida)

The Arkansas River drainage is home to a large population of mule deer and BLM lands in the area offer a great deal of important habitats. The main migration route east of Salida extends east to west across the Pike San Isabel National Forest, through the Badger Creek and Stoney Face Mountain state lands and adjacent BLM lands. Proposed BCAs provide stopover sites within this migration corridor including Crampton Mountain, Waugh Mountain, Wormer Gulch and Cottonwood. Deer concentrate on the north and south sides of the valley in lower elevations during the cold winter months. All proposed BCAs offer Colorado Parks and Wildlife identified severe winter range and/or winter concentration areas. Mule deer hunters rely on BLM backcountry lands, which are accessible through county roads and BLM trails. Game Management Units (GMU) 56, 57 and 58 provided 5,500 recreation days for mule deer hunters in 2012, with a harvest of over 500 animals.

Elk are also abundant and hunted a great deal in this drainage. Elk migrate extensively along the same lands as mule deer, with some north-south migration along small drainages. The proposed Crampton Mountain, Waugh Mountain, Wormer Gulch and Cottonwood areas also provide crucial migration habitat for elk. To the south, the Cottonwood and Baldy proposed BCAs provide important severe winter range and winter concentration areas along the main Arkansas River

valley. Similar to mule deer, elk hunters use a variety of Forest Service, state and BLM lands for high quality hunting opportunities. GMUs 56, 57 and 58 accounted for over 10,000 hunting recreation days and over 400 elk harvested in 2012. Proposed BCAs provide crucial access and opportunities in these GMUs.

The eastern Arkansas River drainage provides habitat for one of the largest Rocky Mountain bighorn sheep populations in Colorado. The Brown's Canyon, Arkansas River, Cotopaxi and Grape Creek/Copper Ridge sheep units offer excellent hunting opportunities and consistent harvest every year. These four units held roughly 460 sheep, or about 15% of the state's population. Several proposed BCAs provide important bighorn sheep habitat and hunting opportunities including Iron Mountain, Hindman Gulch, Deadmans Hill, Wormer Gulch and Arkansas Mountain.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

South Park/Arkansas River Drainage North

BLM lands in this area are scattered and the largest intact backcountry lands occur adjacent to other public lands. These public lands provide important habitat for a number of game species including mule deer, elk, bighorn sheep, antelope and wild trout.

A major north-south mule deer migration route occurs along the Arkansas River on both sides of Leadville and south to Salida. Mule deer rely on this route and migrate both east and west off of this main route, generally moving down from higher altitudes in the north and west. BLM lands, including the Granite proposed BCA, provide core lands for this migration route, along with various parcels of state and Forest Service lands. To the east in South Park, proposed BCAs provide mule deer critical wintering habitat to the east and west of the James Mark Jones State Wildlife Area. Mule deer from the north, south and west move to lands near the Spinney State Wildlife Area to winter as well.

Elk also migrate along this north-south migration route running along the upper Arkansas River Valley. Elk use public lands along this route, including proposed BCAs, and winter in the James Mark Jones State Wildlife Area and surrounding BLM lands, including heavy use of the eastern portion of the James Mark Jones. Public lands in these areas provide excellent access and opportunity for elk hunters. GMUs 49 and 50 consistently produce elk with over 1,800 hunters taking 442 animals in 2012, for a total of about 10,000 recreation days.

The South Park area including the James Mark Jones State Wildlife Area, Spinney and Eleven Mile state lands and surrounding BLM lands, including the proposed BCAs, provide crucial year-round habitat for pronghorn antelope. Pronghorn migrate throughout the South Park valley and Forest Service lands to the east and west. Pronghorn are often found in abundance near the Spinney and Eleven Mile state lands, as well as the proposed BCAs to the southwest of these state lands. Pronghorn hunters in these areas have great access to the spattering of public lands offering quality antelope hunting. The South Park area of Colorado offers some very well-known and productive trout fishing, including over 20 miles of Gold Medal water on the South Platte River near the Spinney State Wildlife Area. Main species include trophy size rainbow and brown trout, with an abundance of freshwater species being pursued in the Spinney and Eleven Mile

reservoirs. Surrounding BLM lands provide consistent sources of fresh, clean water forthe watersheds in South Park.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Mule deer range throughout this [La Veta and Sangre de Cristo] area with Little Sheep Mountain, South Huerfano and North Huerfano proposed BCAs serving as CPW identified severe winter range. Elk also use the area heavily, migrating from higher elevation mountain ranges down to mid-elevation BLM lands in the winter. All of the proposed BCAs provide CPW identified severe winter range and the Silver Mountain BCA is identified as an elk winter concentration area. Rocky Mountain bighorn sheep are found in three of the proposed BCAs: the North and South Huerfano and Point of Rocks area. Bighorns migrate north and south along the Sangre de Cristo range and nearby proposed BCAs provide CPW identified summer range, winter concentration areas and winter range.Big game hunting in the area in consistent and provides great solitude with most of the hunting accessible by foot or on horseback. There is also the opportunity for some scaled quail hunting on proposed BCAs.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Fish and wildlife populations in the RGFO are abundant and offer great opportunities for quality hunting and fishing pursuits. The RGFO contains a number of important habitats for big game including migration areas, winter and summer ranges and calving habitat. The area also offers world-class fishing opportunities for cutthroat, rainbow, brown and brook trout, including over 125 miles of CPW recognized gold medal waters.

Commenter1:Cathy Besmar

Comment Excerpt Text:

This natural setting provides important resources and habitat for the nearby wildlife and ecosystems, Similarly, Big Horn Sheep Canyon is very scenic and natural and provides critical linkages for many wildlife species.

Organization1:Rocky Mountain Bighorn Society

Commenter1:Terry Meyers

Comment Excerpt Text:

Therefore, reducing the risk of interaction between domestic sheep and is of primary importance for maintaining stable populations of bighorn sheep. If the BLM intends to initiate or renew domestic sheep grazing permits in close proximity to bighorn sheep herds, it is imperative that a risk analysis first be conducted using the best available science. The Risk of Contact Tool prepared by the USDA Forest Service Bighorn Sheep Working Group 2013 (U.S. Forest Service, BLM and Idaho Fish and Game) represents the best tool currently available to assess the risk of

contact between bighorn sheep and domestic sheep. We request that the BLM use this tool to assess risk in the course of domestic sheep grazing management.

B.1.10.3. General Fish and Wildlife - Impacts

Total Number of Comments: 23

Summary

The BLM should include analysis of energy development on wildlife. In addition to direct impacts of oil and gas hydraulic fracturing (fracking), impacts of associated transportation and transmission, including impacts of roads, power lines, traffic, and accompanying invasive species, should be considered. Loss of agricultural lands and habitat fragmentation and impacts of renewable energy should also be analyzed.

The BLM should also consider impacts of fences, roads and trails, and new and traditional forms of recreation on wildlife, as well as impacts of gold panning on fish. The BLM should address concerns about the U.S. Army High Altitude Mountain Environment Training (HAMET) project's impacts on wildlife. The cumulative impacts of development and recreational use should be considered.

See Section 2.3.1.7, General Fish and Wildlife (p. 22)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

The Starkey Project research has done much to quantify effects of roads, trails, and associated motorized traffic on elk, and these findings are important to consider in land use plans and travel management plans. (Reference, The Starkey Project: 42-52, 2005, M.M. Rowland, M.J. Wisdom, B.K. Johnson, and M.A. Penninger, 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems.)

Commenter1:Frank Lampe

Comment Excerpt Text:

Additionally, the intrusion of fracking equipment

will impact fragile ecological systems and unnecessarily stress and

dislocate native wildlife.

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

ASGD believes the BLM's decisions regarding the Eastern Colorado Resource Management Plan could enhance the well being of, or contribute to the further steep decline of birds that reside in or migrate through this region. Consequently, we ask that you consider the impacts of all types of

energy development including wind, solar, nuclear if any, not just gas and oil and transportation or transmission of the energy/energy source.

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

Many prairie birds cannot tolerate any object hlgher than the grass in their nesting areas, because these taller objects serve as observation towers for raptors that prey on them and their chicks. Some birds need bare ground in a quiet environment to mate or nest. Many birds need small plants to hide themselves and their nests. All need food and clean water. Roads, power lines, well sites, traffic and the invasive species that accompany them impact all wildlife. Gas and oil and certain types of agricultural activity can obliterate and/or seriously degrade necessary habitat for birds' survival.

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

A few areas in eastern Colorado have never been plowed or significantly disturbed. Good agricultural practices and rehabilitation of previously damaged habitat currently provide food, shelter, and space for reproduction for many species. Loss and fragmentation of this habitat could be disastrous to our wildlife and birds. Also, the loss of the needed variation in habitat could reduce biodiversity

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

c) I have commented previously about mechanized gold panning but it has to affect fish population reproduction with the river bank erosion that occurs

Commenter1:Bill and Ida Beaudin

Comment Excerpt Text:

We've reviewed the positions of the local and trustworthy group "Wild Connections" and are in complete accord with their positions on Wilderness, Wildlife Corridors, eliminating extra roads, protecting flora and fauna, and in a nutshell keeping our Wilderness as wild and pristine as you are able !

Commenter1:Kathy Peterman

Comment Excerpt Text:

Fences would be erected, eliminating habitat for wildlife.

Commenter1:R. Burghilde

Comment Excerpt Text:

there is the disruption of wildlife fracking cuases, impacting the migration paths of deer, antelope, and many more.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW believes the best way to address cumulative impacts (particularly from minerals development) at the landscape scale is to use the best available science, management, and tools and techniques available to assess and mitigate these impacts. Impacts to wildlife should be avoided where possible, minimized through best management practices, or mitigated if necessary.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

As confirmed during the recent CPW and BLM scoping meeting in Denver, there are a number of recreation related new or emerging concerns on BLM surface with significant potential for impacting sensitive wildlife or habitats. These include, but are not limited to use of drones, shed hunting, and non-motorized bicycles specifically designed for winter use. CPW would like to raise these new or emerging concerns as an issue to be evaluated for their relevance and possible impact on wildlife as well as best methods to address such impacts during the ECRMP Revision/EIS process.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

The U. S. Army High Altitude Mountain Environment Training (HAMET) project has the potential to negatively impact a variety of species of wildlife and the hunting public. CPW requests the opportunity to work with the BLM and the Army to attempt to minimize potential impacts to wildlife and the public should this project move forward anywhere in the ECRMP area.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW has an interest in grazing and vegetation management, land tenure adjustments, and travel management on Federal surface lands as they relate to parks and wildlife. This would include the issues associated with adequate fencing for bison and their impacts to wildlife.

Commenter1:Heike Momiyama

Comment Excerpt Text:

. While there may not be endangered species on all of our public lands, the makeup of wildlife seems to be ever changing particularly as more populated areas expand and push wildlife out. How do we know that by changing the use of public lands that we are not negatively impacting wildlife? What was once not considered birthing or habitat grounds may change to become that sort of area. For example, earlier this summer I discovered a pair of Moose wandering through the BLM area CR 304 near the overlook. I had not seen that before. What sort of study can be conducted to anticipate changes in wildlife needs over the course of the 20 years covered by the plan?

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Public Service runs a snowcat into upper Iowa Gulch east of Leadville to regularly inspect its power lines. Snowmobilers and skiers regularly use this route to intrude up on a winter concentration area for Bighorn Sheep, stressing these animals.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

The RMP needs to address the potential of possibly high traffic mountain bike trails to fragment the core habitat areas mapped in the 2004 RMP, for subunits Booger Red Hills, the Gulches, Deer Haven, and Twin Mountain.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Core Habitat Values

This area is part of a large contiguous Core Habitat Area identified in Appendix 11 of the 2004 Gold Belt TMP on Maps, 10, 11, and 12 (pages 43, 44, 45) that extends south all the way to the Gulches and Shelf Road subunits. No new trails should be built in this core habitat area to maintain its landscape integrity and habitat effectiveness for the species listed below. See Booger Red Hill Desired Future Condition in Gold Belt RMP.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Wildlife habitat on RGFO BLM lands has become all the more important in sustaining viable wildlife populations as habitat on private lands has been developed for subdivisions. “As homes and people move into former open space, wildlife are being displaced and forced to move from traditional ranges. Public lands are an increasingly critical source of land for providing

core, undisturbed habitat for all species, as well as connectivity of habitats that is important to wildlife," 2004 Gold Belt TMP, p. 81.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Importance of Core Habitat unfragmented by hightraffic, high speed trails:

"Wildlife thrives best in larger blocks of undisturbed habitat rather than smaller fragmented pieces p p 81. While not as noisy and physically impacting as motorized trails, mountain bike trails contribute to habitat fragmentation by densities, and intensities of use¬¬the latter involving volumes of use, large groups sizes, and timing of use, spreading human disturbance on trails throughout the year, shoulder seasons, and morning and evening times, leaving less undisturbed time for wildlife than OHVs, which tend to be out on the land at more limited time intervals.

See Habitat Fragmentation Research Summary accompanying these comments, submitted on paper in person (along with hand written comment form) to the Royal Gorge Field Office (to the wildlife biologist, Lara, and John Smeins) on July 7, 2015. Also see Vail Study mt bike study.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

C. Wildlife Movement Corridors

The RMP needs to analyze the impacts of Trail connectivity on Wildlife connectivity.

According to research and the Gold Belt TMP "wildlife corridors connect separate habitat areas allowing wildlife to move between separated habitat areas, to disperse, exchange genes, seek out productive forage and move from summer to winter ranges." The human connectivity of trail loops and linkages interferes with wildlife connectivity for examplecritical big horn sheep movement corridor that is documented, (by CPW) as having recent increased use through Four Mile Creek south of Booger Red Hill

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

when considering cumulative impacts of multiple wells and well pads in a location, the impacts on wildlife and their habitat can be great and spread across landscapes causing range wide declines.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Elk avoid areas near open roads. A plethora of studies have demonstrated increasing frequencies of elk occurrence or indices of elk use as the distance from open roads (defined as any road where motorized vehicles are allowed) increases [4. Rowland, Mary M., Michael J. Wisdom, Bruce K. Johnson, and Mark A. Penninger. 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems. Available at: http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-04_Rowland.pdf]. Elk vulnerability to mortality from hunter harvest, both legal and illegal, increases as open road density increases. There is compelling evidence that survival rates of elk are reduced in areas with higher road densities. In areas of higher road densities, elk exhibit higher levels of stress and increased movement rates. Higher levels of physiological indicators of stress, such as fecal glucocorticoids, have been observed in elk exposed to increased road density and traffic volumes [5. Millspaugh, Joshua J.; Woods, Rami J.; Hunt, Kathleen E.; Raedeke, Kenneth J.; Brundige, Gary C.; Washburn, Brian E.; Wasser, Samuel K. 2001. Fecal glucocorticoid assays and the physiological stress response in elk. Wildlife Society Bulletin. Volume 29, Issue 3, p. --907.]. Mule deer harassed by ATVs altered their feeding and spatial-use patterns and produced fewer offspring the following year [6. Yarmaloy, C., M. Bayer, and V. Geist. 1988. Behavior responses and reproduction of mule deer does following experimental harassment with all-terrain vehicle. Canadian Field Naturalist. 102:425-429]. In response to road construction, mule deer in Wyoming were found to alter their habitat use and the avoidance often extended to distances in excess of one mile [7. Sawyer, H. R., D. Neilson, D. Strickland and L. McDonald. 2008. 2008 Final Report for the Sublette Mule Deer Study (Phase II): Long-term monitoring plan to assess potential impacts of energy development on mule deer in the Pinedale Anticline Project Area. Western Ecosystems Technology, Inc. Cheyenne, WY. USA.]. For these reasons, backcountry lands need to be conserved within the RGFO to maintain high quality, functional big game habitat and maximum hunting opportunities.

Organization1:Rocky Mountain Bighorn Society

Commenter1:Terry Meyers

Comment Excerpt Text:

Disease transmission between domestic goats and bighorn sheep has also been documented in several cases. Therefore, it is also important to protect bighorns from interactions with domestic goats. The use of goats as pack animals is becoming increasingly popular. Several BLM and U.S Forest Service units have initiated or completed implementation of pack goat restrictions in bighorn sheep habitat. We would like the ECRMA to consider the same restrictions in order to protect our Colorado bighorn sheep.

B.1.10.4. General Fish and Wildlife - Mitigation Measures

Total Number of Comments: 4

Summary

The BLM should consider off-site mitigation funding and compensatory mitigation techniques to address impacts on fish and wildlife and their habitats. The BLM should also consider exceptions only where the action: (i) would be the preferable course of action to meet the goals and objectives of the RMP; or (ii) is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear net conservation gain to priority wildlife habitat. Mitigation measures should be done in consultation with CPW.

See Section 2.3.1.7, General Fish and Wildlife (p. 22)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Likewise, where appropriate, opportunities for off-site mitigation funding should be directed toward protection or purchase of crucial wildlife habitat

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF encourages the BLM to manage vehicular traffic to minimize displacement of elk from public lands or over-harvest of elk on public lands, while still providing for recreational use. There must be close coordination between the land use plan and the travel management plan.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW encourages the use of compensatory mitigation techniques in the ECRMP. In particular, as the surface density of oil and gas development increases beyond one well pad per section, literature sources strongly suggest that avoidance and minimization measures alone are no longer sufficient to address adverse impacts to some species. Therefore, compensatory mitigation is necessary to offset the permanent loss of wildlife resources. CPW encourages the BLM to incorporate avenues to seek compensatory mitigation when surface density of oil and gas development exceeds one well pad per section or when other development parameters exceed the point where normal operation practices provide sufficient avoidance and minimization of impacts to wildlife.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

As to Exceptions, to ensure proper management, the Authorized Officer could grant an exception to a NSO stipulation only where the proposed action:

(i) Would be the preferable course of action to meet the goals and objectives of the RMP; or,

(ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear net conservation gain to priority wildlife habitat.

Exceptions to this lease stipulation based on (i) above should be granted only after consultation with Park County, affected landowners and Colorado Parks and Wildlife.

Exceptions should be granted only where allowing surface occupancy at a specific site within the lease parcel would better achieve the goals and objectives of the RMP than siting surface occupancy elsewhere. Exceptions based on (ii) should be granted only after consultation with Colorado Parks and Wildlife and also should include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts. Approved Exceptions shouldbe made publicly available at least quarterly.

B.1.11. Special Status Species

B.1.11.1. Special Status Species - Section 7

Total Number of Comments: 1

Summary

The BLM should work with USFWS to plan for listed species, list all of the relevant recovery actions for the plan, and incorporate specific species recovery plan actions as RMP prescriptions.

See Section 2.3.1.8, Special Status Species (p. 23)

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The Eastern Colorado RMP should incorporate threats to recovery in pre-planning assessments and adopt within the RMP conservation measures and actions identified in recovery plans. The BLM should collaborate with the U.S. Fish and Wildlife Service early in the planning process to develop effective listed species plan decisions. At a minimum, the BLM needs to list all of the recovery actions to which it is accountable and should incorporate specific species recovery plan actions as Eastern Colorado RMP prescriptions.

B.1.11.2. Special Status Species - Alternatives

Total Number of Comments: 11

Summary

The RMP should address concerns about protecting and conserving sensitive and priority wildlife habitats and species throughout the planning area, including protecting core wildlife areas, quality fisheries, cutthroat trout and eastern plains small fishes critical habitat, lesser prairie chicken habitat , plains sharp-tailed grouse habitat, mountain plover habitat, Gunnison prairie dog habitat, big game winter range and seasonal migration corridors, wetlands and riparian corridors, and raptor nests.

The RMP should include and prioritize objectives and other RMP decisions to improve the conservation status of sensitive status species. Monitoring plans should be included to determine whether the RMP decisions are effective at improving the species conservation status. The BLM should use the "coarse-fine filter" approach (i.e., conservation of key ecosystem characteristics to

sustain most species, coupled with targeted management for some special status species and all listed species). The BLM should consider using the model planning process for special status species that commenters provided.

See Section 2.3.1.8, Special Status Species (p. 23)

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW has concern for protection and conservation of sensitive and priority wildlife habitats and species (including low elevation riparian corridors) during future mineral development throughout Eastern Colorado. Protection would include such measures as: avoid loss or fragmentation of habitat, minimize impacts to the extent possible, or implement mitigate where impacts cannot be avoided or minimized. CPW also recommends focusing on maintaining contiguous habitat areas wherever possible.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Protection of core wildlife areas, quality fisheries, cutthroat trout and eastern plains small fishes critical habitat, lesser prairie-chicken habitat , plains sharp -tailed grouse habitat, mountain plover habitat, Gunnison prairie dog habitat, big game winter range and seasonal migration corridors, wetlands and riparian corridors, and raptor nest s are of extreme importance (see Appendix A for list of High Priority/Sensitive species and habitats within ECRMP).

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Research continues on the potential for distinct taxonomic revisions and distribution ranges for greenback and Colorado River cutthroat trout and environmental analysis in the proposed RMP should include management implications and direction for the future of native cutthroat in the Royal Gorge planning area. Regardless of taxonomic distinctions, it is imperative to protect cutthroat trout populations and their watersheds.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

the Eastern Colorado planning process and RMP should create an effective conservation planning framework for BLM sensitive species. The RMP must further the objective to “initiate proactive conservation measures that reduce or eliminate threats to sensitive species to minimize the likelihood of and need for listing” and “bring species and their habitats to the condition under which management under the Bureau sensitive species program would no longer be necessary”

(BLM 6840 Manual .02B and .2B). These objectives should be used as criteria to evaluate the effects of alternatives within the DEIS. Under Planning 2.0 principles, the planning process should also describe how the BLM will evaluate whether those objectives are being met during plan implementation. The RMP should be clear that it will proactively and measurably improve the conservation status of sensitive species within the planning area.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Objectives and other plan decisions to improve the conservation status of those species must be included and prioritized in the RMP (BLM 6840 Manual .2C2 and 2C5), as should monitoring plans to determine whether the plan decisions are effective at improving the species conservation status (BLM 6840 Manual 2C3).

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The REA and AIM programs have established a conceptual ecosystem model to derive core indicators of ecological function and land health. To further refine and operationalize these precepts, we encourage the BLM to adopt a "coarse-fine filter" approach (i.e., conservation of key ecosystem characteristics to sustain most species, coupled with targeted management for some special status species and all listed species) that can meet conservation requirements for multiple species and entire landscapes, alleviating problems associated with piecemeal or species-by-species planning. As stated above, this approach is reflected in the Eastern Colorado AMS (Eastern Colorado AMP 2015 at 56).

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

If appropriate indicators of ecosystem condition are chosen for management emphasis, most native species are likely to be conserved through management of landscape/ecosystem characteristics—but some species have more narrow conservation requirements. In addition, federally listed species have specific legal and regulatory requirements. The BLM should identify the conservation needs of such species during the pre-planning assessment phase. Planners can provide for the persistence of these species by either incorporating their conservation needs into a landscape conservation strategy, or through the development of species-specific conservation strategies.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The BLM should prioritize special status species management in the Eastern Colorado RMP revision to conserve listed flora and fauna and "reduce the likelihood and need for future listing under the ESA" (BLM 6840 Manual .01). The new management plan should clearly articulate meaningful actions that will measurably improve the conservation status of sensitive species. We believe stronger integration of special status species Management into planning is crucial to helping avoid future conflicts and controversies, and is a critical component to assessing and managing key ecological attributes that are at the core of BLM's landscape approach to management and mitigation

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Under Planning 2.0 concepts (i.e., improving ecological conditions for wildlife under the landscape approach), the Eastern Colorado RMP should include affirmative provisions for conserving special status species. RMPs and associated NEPA documents should include goals and objectives (desired outcomes) and measures needed to achieve these goals and objectives (management actions, mitigation measures and allowable uses) to conserve and contribute to recovery of Bureau special status species. In order for the planning process to be dynamic, efficient and effective in conserving wildlife, it must clearly identify what species need to persist, define how the Bureau will contribute to those needs, and establish mechanisms to determine if the RMP is or is not effectively doing so.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

We recommend adopting a "coarse-fine filter" conservation planning approach that can meet conservation requirements for multiple species, as described below. This approach, if conducted properly, can provide for the conservation needs of multiple species by managing for key ecological attributes associated with ecosystem composition, function, structure and connectivity and by identifying and providing for more narrow conservation needs of certain at-risk species, including federal listed threatened and endangered species. The Eastern Colorado AMS indicates the BLM will use this approach for the RMP (Eastern Colorado AMP 2015 at 56).

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Following is a summary of a model planning process for special status species:

1. Use pre-planning assessment(s) (i.e., the AMS) to identify special status species, and, given available information, their distribution, abundance, population condition, current threats and habitat and conservation needs to improve their status. Habitat and conservation needs should be described in terms of ecosystem structure, composition, function, and connectivity, as well as human uses and development.

2. The assessment(s) should document the significance of BLM-administered lands and actions undertaken by the BLM in conserving those species.

3. The assessment(s) should also document the conditions needed to "improve the condition of the species habitat on BLM-administered lands" (see BLM 6840 Manual Glossary at 43) and indicate where the planning area contains "ecological refugia" (BLM 6840 Manual .2A2) necessary for the conservation of the species on BLM lands. Species with similar needs should be grouped so that plan decisions can provide for the conservation of multiple species.

4. In addition to documenting existing threats to species, the assessment(s) should identify the effects of stressors such as climate change on special status species within the context of those threats, so that management plans can "initiate proactive conservation measures that reduce or eliminate threats" (BLM 6840 Manual .02B) and support species to successfully adapt to changing environments.

5. Information in the assessment(s) then needs to be carried forward into management planning in the form of plan decisions and adaptive management and monitoring strategies. Alternative approaches to achieving conservation objectives for special status species should be evaluated in the NEPA process, and each alternative should be evaluated to determine if it results in improved conservation of the species.

6. Management plan decisions (including alternatives within the draft environmental impact statement (DEIS)) should be formulated to capture the habitat and conservation needs of multiple special status species. Specific measures will need to be developed for individual species not likely to benefit from landscape-scale plan decisions.

7. Management plans (and alternatives within the DEIS) should include specific and measurable decisions for special status species, including:

a. Desired outcomes, management goals and objectives should be designed to improve the conservation status of species or reduce negative stressors on species conservation.

b. Desired outcomes, management goals and objectives should be used to inform mitigation measures, including areas to avoid development and land use, impacts to be minimized, and appropriate compensatory mitigation measures where development and land use are unavoidable.

B.1.11.3. Special Status Species - Baseline Affected Environment

Total Number of Comments: 11

Summary

The EIS should provide complete special status species inventories using an in-depth, geospatial analysis to define the scope and magnitude of sensitive wildlife habitats and species intersected or impacted by the various management uses indicated in the RMP. Information gaps and uncertainty associated with the conservation of special status species should be documented in the planning process and addressed through an active adaptive management and monitoring program. The RMP should address concerns about the following special status species in the planning area: lesser prairie chicken, Mexican spotted owl, Canada lynx, American peregrine falcon, and bald eagle.

The BLM's Analysis of the Management Situation should include these species: Arkansas River shiner (Notropis girardi), listed as endangered; Sprague's pipit (Anthus spragueii), a candidate species.

The BLM should consider designating the following imperiled species as sensitive species in the planning area:

- Burrowing owl (Athene cunicularia)
- Colorado checkered whiptail (Aspidoscelis neotesselata)
- Colorado green genetian (Frasera coloradensis)
- Hops azure (Celastrina humulus)
- Bowman's tiger moth (Grammia bowmani)
- Smith's whitlow-grass (Draba smithii)
- Colorado larkspur (Delphinium nuttallianum)
- Horrid herrickia (Eurybia horrida)
- Weber's monkeyflower (Mimulus gemmiparus)
- New Mexico gaura (Gaura neomexicana)
- Pike's peak spring-parsley (Oreoxis humilis)
- Weber's whitlow-grass (Draba weberi)
- Penland's alpine fen mustard (Eutrema penlandii)

See Section 2.3.1.8, Special Status Species (p. 23)

Commenter1:Anne Akers-Lewis

Comment Excerpt Text:

These lands are habitats for a high diversity of plant and animal wildlife, for example the endangered Canadian lynx and narrow leaf cottonseed/river birch woodland in the Badger Creek area. Another spectacular area that deserves protection is the Beaver Creek Wilderness Study Area (WSA). Amongst the variety of wildlife that reside there are some bird species listed as Species of Most Concern, including the Mexican spotted owl, American peregrine falcon, and bald eagle.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Following the scoping phase, we anticipate the need for an in-depth, gee-spatial analysis to define the scope and magnitude of sensitive wildlife habitats and species intersected or impacted by the various management uses indicated in the ECRMP. As part of this scoping review, we have provided a current list of all the various high priority habitats and species that occur within CPW's

Northeast and Southeast Regions (all areas east of the Continental Divide), which correspond approximately with the boundaries of the ECRMP.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

On March 27, 2014, the Lesser Prairie-Chicken (LEPC) was listed as a threatened species by the United State Fish and Wildlife Service (USFWS). Part of the species range overlaps with the area defined in the RMP revision in southeast Colorado. Currently, critical habitat has not been defined for the species, but the general range is defined by the Lesser Prairie-Chicken Range-Wide Conservation Plan (http:/ /www.wafwa.org/documents/2013LPCRWPfinalfor4drule12092013.pdf) as the estimated range of the species plus a 10 mile buffer. Maps of this area can also be found at the following link: (http:/ /kars.ku.edu/geodata/maps/sgpchat/). In addition to the area, CPW has recently found LEPC activity in northeast Cheyenne County in Colorado. This area is outside of the estimated occupied range, but should be considered in the RMP revision. Due to the threatened designation, development within the occupied range would require enrollment in the Lesser Prairie-Chicken Range-wide Conservation Plan for rule 40 protections, or consultation with the USFWS.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

It is critical that the EIS provide complete [special status species] inventories

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Identification of federal and state special status and Threatened and Endangered species (both flora and fauna), and mitigation to protect these species.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The AMS incorporates assessment of the plan area resources and conditions. With regard to wildlife, the document provides an account of at-risk and other specials status species in the plan area. In some places this information is incomplete. Such information should be provided in further assessments and the DEIS. Information gaps and uncertainty associated with the conservation of special status species should be documented in the planning process and addressed through an active adaptive management and monitoring program. The AMS lists 28 threatened, endangered, and candidate species in the planning area (Eastern Colorado AMS at 98-99). Species that should be added to this list include the Arkansas River shiner (Notropis girardi), listed as endangered, and the Sprague's pipit (Anthus spragueii), which is a candidate species.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The BLM should also consider designating the following imperiled species as sensitive species in the planning area.

- Burrowing owl (Athene cunicularia)1 [1 The AMS questioned whether the birds occur in the planning area. They do (VerCauteren et al. 2001). They are found where there are both black-tailed and Gunnison's prairie dogs that occur in the planning area.]
- Colorado checkered whiptail (Aspidoscelis neotesselata)
- Colorado green genetian (Frasera coloradensis)
- Hops azure (Celastrina humulus)
- Bowman's tiger moth (Grammia bowmani)
- Smith's whitlow-grass (Draba smithii)
- Colorado larkspur (Delphinium nuttallianum)
- Horrid herrickia (Eurybia horrida)
- Weber's monkeyflower (Mimulus gemmiparus)
- New Mexico gaura (Gaura neomexicana)
- Pike's peak spring-parsley (Oreoxis humilis)
- Weber's whitlow-grass (Draba weberi)
- Penland's alpine fen mustard (Eutrema penlandii)

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

For example, the Mexican spotted owl profile includes habitat requirements (except habitat connectivity requirements), but does not include any information about habitat conditions in the planning area, particularly on BLM lands (Eastern Colorado AMS 2015 at 102-103). Critical habitat designated for the owl in the planning area includes BLM land in Custer, Fremont, Teller, El Paso, and Jefferson counties. The profile lists generally known threats to Mexican spotted owls but does not describe or quantify the extent of these threats on BLM land. What specific land uses and management actions threaten the owl? What management prescriptions can be formulated from this information? Is the current plan effectively contributing to the recovery of this species? Without this level of evaluation, it will be difficult to assess the adequacy of management provisions (or the lack of management provisions) in the proposed RMP aimed at contributing to the recovery of the Mexican spotted owl.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

the Canada lynx (Lynx canadensis) profile acknowledges that BLM lands in the plan area provide important connectivity habitat for lynx moving between National Forest System lands (Eastern Colorado AMS 2015 at 106). However, the AMS offers little on how uses and management activities are affecting connectivity. For example, what is the road and trail density in this habitat? What is the extent of timber harvesting, stand-replacing fire, and recreational use in this habitat? Providing for wildlife connectivity across ownership types must be a central goal under a landscape approach to conservation planning.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

Badito Cone is the focus of the view from my bedroom. It should be preserved as wilderness to provide a corridor of connectivity between the herd of Rocky Mountain Bighorn Sheep in the Black Hills area a few miles south of Badito Cone and the Rocky Mountain Bighorn Sheep within the Greenhorn Wilderness area. There is a Peregrine Falcon nest that has been used for many years a few miles to the north in Mexican Spring Canyon. It was monitored for many years by the Colorado Peregrine Recovery Project. Mexican Spotted Owls have been documented in that area as well. Both of these are very sensitive species.

Organization1:ArkansasValley Audubon Society

Commenter1:SeEtta Moss

Comment Excerpt Text:

Habitat for federally and/or state listed Threatened and Endangered Species including:

1. Lesser PrairieChicken (Federal and state threatened)

2. Least Tern (Federal and state endangered)

3. Piping Plover (Federal and state threatened)

4. Mexican Spotted Owl (Federal and state threatened)
5. Canada Lynx (Federal threatened and state endangered)
6. Greenback Cutthroat Trout (Federal and state threatened)
7. Penland alpine fen mustard (Federal threatened)
8. Arkansas Darter (state threatened)
9. Boreal Toad (state endangered)

Other special status wildlife species habitat:

1. Bald Eagle (state species of concern)
2. Peregrine Falcon (state species of concern)
3. Ferruginous Hawk (state species of concern)
4. Mountain Plover (state species of concern)
5. Western Snowy Plover (state species of concern)
6. Longbilled Curlew (state species of concern)
7. Burrowing Owl (state threatened)
8. Swift Fox (state species of concern)
9. Townsend's BigEared Bat (state species of concern)
10. BlackTailed Prairie Dog (state species of concern)

Special status plant species

1. Eriogoniam brandigee
2. Golden Blazing Star
3. Degener Beardtongue
4. Rockloving Neoparrya

[The natural resources in the Eastern Colorado Resource Management Plan including all of these ACEC's, much of the habitat for Threatened and Endangered Species and other special status species are at risk of degradation and/or fragmentation due to other permitted uses including mineral and energy development, recreation. as well as timber harvesting and livestock grazing. With the increases in population driving the numbers of citizens accessing BLM lands, increases in energy development on BLM lands along with impacts from Climate Change it is essential that BLM take necessary steps to protect our valuable natural resources in order to meet the mission of BLM, “"to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations." Clearly the productivity of these public lands for future generations will be diminished if the land health is not protected by actions taken in this Resource Management Plan.]

B.1.11.4. Special Status Species - Impacts

Total Number of Comments: 3

Summary

The BLM should conduct a fine-scale assessment of impacts form anticipated energy or transmission line corridors. The RMP should address concerns about impacts of energy development, vegetation clearing, pipeline construction, and recreation on the Gunnison sage-grouse and the impacts of energy development on desert massasauga.

See Section 2.3.1.8, Special Status Species (p. 23)

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends that the ECRMP EIS include a fine scale assessment of impacts to wildlife habitats for all existing and anticipated energy or transmission line corridors. This assessment should focus on potential impacts to the following sensitive habitats: wetlands, riparian habitats, lesser prairie chicken core habitats, plains sharp-tailed grouse active leks and breeding and nesting habitat; big game habitats including winter ranges, migration corridors, and parturition areas; and active nests for bald eagles, golden eagles, ferruginous hawks, prairie falcons, and mountain plover.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Gunnison prairie dog is a priority species for CPW. In November of 2013, the USFWS published a 12 ·month finding of listing not being warranted for the species. It is expected that the status of the species will be evaluated in the future, so it is important that conservation measures be put in place for protections. Given this, CPW is concerned about the impacts of energy development, vegetation clearing, pipeline construction, and recreation for this species.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

In 2010, a petition was submitted to list the desert massasauga rattlesnake under the Endangered Species Act. At this time, the listing of this species has not occurred. However, CPW is concerned about the impacts of energy development on desert massasauga. Desert massasauga occurs in a variety of grassland and shrubland habitats, including shortgrass prairie and sandsage grasslands in Colorado. Habitat degradation and loss are the primary threats to the desert massasauga.

B.1.11.5. Special Status Species - Mitigation Measures

Total Number of Comments: 1

Summary

Implementation must include monitoring to evaluate the effectiveness of management to conserve sensitive species. Special status species should receive particular attention in the BLM's Assessment, Inventory, and Monitoring (AIM) Strategy. Where there is uncertainty as to whether an RMP decision will improve the conservation of a special status species, that uncertainty should be addressed within the Draft EIS, and an adaptive management approach should be employed.

See Section 2.3.1.8, Special Status Species (p. 23)

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Implementation must include monitoring to evaluate the effectiveness of management to conserve sensitive species. Special status species should receive particular attention in BLM's AIM Strategy. Where there is uncertainty as to whether a plan decision will improve the conservation of a special status species, that uncertainty should be addressed within the DEIS, and an adaptive management approach should be employed.

B.1.12. Cultural Resources

B.1.12.1. Cultural Resources - Alternatives

Total Number of Comments: 5

Summary

The BLM should include provisions for the identification and management of significant cultural resources located on BLM-administered lands, including following all Section 106 of the National Historic Preservation Act processes and including input from the Park County Historic Preservation Advisory Commission. The BLM should consider partnerships with local groups to help manage the workloads associated with recording and preserving historic properties. Lease holders should be notified if their leases include known cultural resources. Surveys should be conducted on areas that have not been previously surveyed. The BLM should prioritize the most sensitive, important, and at-risk areas for cultural resources and commit to performing surveys before making final resource allocations in the RMP.

See Section 2.3.1.9, Cultural Resources (p. 23)

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County requests that the Resource Management Plan include provisions for the identification, management and protection of significant paleontological and cultural resources located on BLM lands within the County. Specifically, Park County recommends:

- National Historic Preservation Act Section 106 compliance processes should be followed for all undertakings and adverse effects to significant cultural resources avoided or mitigated as specified in 36 CFR 800.

- The Park County Department of Heritage, Tourism and Community Development (PCDHTCD) serves as the management entity for the South Park National Heritage Area (SPNHA) and oversees the county's Certified Local Government (CLG) program with advisory input from the Park County Historic Preservation Advisory Commission (PCHPAC). The PCDHTCD and PCHPAC should be consulted whenever the BLM plans to conduct activities that may have an impact on cultural resources within the Heritage Area and Park County.

- The RMP should not conflict with the cultural resource goals established for South Park in the 2013 South Park National Heritage Area Management Plan.

- To increase capacity, the BLM should develop partnerships with federal, state, and local organizations, and/or develop public/private collaborations, to support and enhance the identification, evaluation, and protection of cultural resources located on BLM lands—activities mandated by National Historic Preservation Act Section 110. The BLM's past partnership with the Heritage Area-sponsored South Park Archaeology Project (SPArP) toperform archaeological research on BLM lands could serve as a model for such partnerships.

- Research-based cultural resource inventories should be encouraged and a systematic plan developed for the survey and inventory of cultural resources on BLM lands. This plan could involve collaborative partnerships with educational institutions and federal, state and local organizations interested in the protection of cultural resources and cultural resource management. Survey sites should be prioritized by the probability of locating significant cultural resources, prehistoric or historic. [information omitted due to its sensitive nature].

- In an effort to monitor and reduce loss of cultural resource integrity due to factors such as natural weathering, erosion, wildfire, ground disturbance, grazing, recreation use, and unauthorized collection, intrusion, and vandalism, the BLM should take advantage of programs such as the South Park Site Stewards program to assist with the monitoring and protection of significant cultural sites located on BLM lands.

- To best protect against adverse impacts, significant cultural sites should remain under BLM management.

- The BLM should carefully consider the impact of recreational activities, particularly off-trail OHV use, on cultural resources and limit these activities in and around significant cultural sites.

- Develop public outreach programs designed to educate the public, especially recreationists, about resource protection laws (such as the Archaeological Resources Protection Act) and the value of protecting cultural sites.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Potential lessees and project managers should be notified by BLM of known culturalresources located within lease or project areas to encourage proactive planning that ensures significant cultural resources will not be adversely affected.

-All permits for work should be referred to the Park County Department of Heritage, Tourism and Community Development for comment and all Park County permitting procedures related to the protection of cultural resources should be followed

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

-For all areas that have not been previously surveyed, a Class III cultural resources survey should be conducted by a qualified cultural resource professional prior to any project. If cultural resources surveys identify areas with a high probability of encountering potentially significant sub-surface archaeological sites, a qualified archaeologist should

monitor any ground disturbance activities.

-If previously undetected paleontological or cultural resources are discovered during construction, all construction activities should be suspended, the State Historic Preservation Office and Park County immediately notified and the site protected from further damage or looting. Work should not proceed until paleontological materials or cultural resources are properly evaluated by a qualified paleontologist or archaeologist.

-Lessees or project managers should inform their employees, contractors and subcontractors about all relevant federal, state, and local regulations intended to protect archaeological and cultural resources.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM's goal should be to protect, conserve, and where appropriate restore cultural and historical sites and landscapes. To that end, BLM should:

-Survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected.

-Determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources.

-Complete a Cultural Resource Management Plan that coordinates with the objectives of the RMP and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties to the National Register. The RMP should establish a timeline for completing the Cultural Resources Management Plan, and prioritize areas to be inventoried for cultural resources.

-Outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and where appropriate restore cultural resources.

-Adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.

-Consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should prioritize the most sensitive, important, and at-risk areas for cultural resources and commit to performing surveys before making final resource allocations in the RMP. This should include prioritizing all proposed motorized route designations for surveys since these will have the greatest impact on cultural resources of all routes.

B.1.12.2. Cultural Resources - Baseline Affected Environment

Total Number of Comments: 4

Summary

The RMP should include baseline cultural resource information provided by commenters, including points of contact for the South Park National Heritage Area and the Huerfano County Historical Society, who should be contacted to provide specific information related to the unique historic properties in these areas. The RMP should include a description of the Skagway hydroelectric plant, as the site and structure is historically significant.

See Section 2.3.1.9, Cultural Resources (p. 23)

Commenter1:Eddie Kockman

Comment Excerpt Text:

Linda Balough, Executive Director of the South Park National Heritage Area is a source for data especially concerning historical, paleontological and archeological activities.

Commenter1:Michael White

Comment Excerpt Text:

BLM is obligated to protect historical and archeological values. To satisfy that responsibility, BLM should collaborate closely with the Huerfano County Historical Society which has located,

described, and photographed sites of historical and archeological significance throughout the county.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The Bureau of Land Management (BLM) manages 7 percent of the surface land within the SPNHA boundary as well as a significant amount of land within Park County but outside of the Heritage Area. BLM also manages mineral estate in much of South Park, with activities that can cause surface disturbance. More than 2,720 cultural sites, of which approximately 16 percent are potentially eligible, officially eligible, or listed on the National Register of Historic Places, have been identified on BLM lands and steps have been taken to protect them from adverse effects. However, approximately two-thirds of the total acreage managed by the Royal Gorge Field Office (RGFO) have not yet been surveyed and may contain significant cultural resources that today remain undiscovered and undocumented. Furthermore, the AMS for the Eastern Colorado RMP acknowledges that, in general, cultural resource conditions on RGFO managed lands are declining, mainly due to natural erosional processes, increased casual use of public land and limited site monitoring and protection.

Commenter1:Eric Swab

Comment Excerpt Text:

Cultural Resources Skagway Hydro-electric plant

Comment Document Name: Notice of Intent to Prepare Eastern Colorado Resource Management Plan

Comment Number: 1

Comment Title: Cultural Resources Skagway Hydro-electric plant

Comment:

[information omitted due to its sensitive nature.]

B.1.13. Visual Resources

B.1.13.1. Visual Resources - Alternatives

Total Number of Comments: 19

Summary

The BLM should consider impacts to visual resources, particularly viewsheds. The BLM should employ visual resources management that values wide open spaces in Huerfano County, undeveloped lands, scenic corridors and viewsheds, prairie viewsheds, grasslands, sagebrush sea, South Park, dark night skies, and aesthetics. The BLM should discourage communication sites in sensitive viewsheds. All of Huerfano County, lands with wilderness characteristics, backcountry

recreation areas, and ACECs should be designated as VRM Class I or II. When designating VRM classes, the BLM should consider proximity to Land Trust of the Upper Arkansas lands.

Travel corridors crossing BLM-administered resources in Huerfano County to and from scenic, cultural, recreational, and historic resources, as well as BLM-administered resources within view of those travel corridors, should be designated as VRM Class II. The RMP should prescribe management of the seven scenic corridors and other visual resources as VRM Class II. The following travel corridors were specifically recommended for VRM Class II because of their visual resources. Some of these areas are recommended upgrades in VRM class.

See Section 2.3.1.11, Visual Resources (p. 24)

- Interstate Highway 25 (I-25), West of I-25
- Westbound Route 160 out of Walsenburg towards La Veta Pass
- County Road 580 leading to Mosca Pass trail
- In Gardner area, Pass Creek scenic loop and Red Wing area travel routes towards Mosca Pass and Lily Lake area
- The entire Gardner road running towards Black Mountain and then to the Greenhorn Wilderness Area
- The southern face of the Greenhorn Mountains
- Huerfano Park corridor to Pass Creek Road beginning at Route 69 Gardner and ending at Route 160 La Veta Pass
- North of Route 69 in Gardner BLM-administered lands
- County Road 520 between Route 69 Badito and Route 160 north of La Veta passing the Silver Mountain dike cluster and the approach to Major's Ranch subdivisions
- Silver Mountain dike cluster area
- East Spanish Peak access from Walsenburg along Bear Creek Road, including dike formations

Commenter1:Tony Greiner

Comment Excerpt Text:

I have rafted the Arkansas river in Colorado and it is amazing. Totally beautiful, clean wilderness. I don't, however, visit north western New Mexico any longer, it's become, for lack of a better word, ugly. North western New Mexico is now pocked with oil and gas wells, rigs and trucks and no longer fit for recreation. Every direction is the view of the destruction of nature, the cause of climate change. Don't turn eastern Colorado into the north western New Mexico of Colorado. It's a fine line and once it's crossed there is no going back.

Commenter1:Karyn Ames

Comment Excerpt Text:

For Huerfano County, I ask that Classes I and II be designated for all of the county to preserve the scenic attributes of a county that depends on tourism for its money. I feel very strongly that any industrial uses of the land will upset one of the last remaining pristine places in Colorado that has not succumbed to gas/oil/and related dirty business. I want this county to continue to be pollution free.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

When designating visual resource management classes for BLM lands, proximity to lands with LTUA conservation easements should be considered.

Commenter1:Todd A. Van Dyke

Comment Excerpt Text:

It is important to maintain scenic corridors and view sheds in all of Colorado. I have lived in the Front Range metro area for over 40 years. Also my wife and I have owned 70 acres in Huerfano County for over 12 years. With the congestion of the Denver area, we appreciate the wide open spaces that Huerfano County offers. It is a joy of reassurance to be able to drive the county roads through the beautiful ranch, state and BLM lands that are not developed.

Organization1:SPOT

Commenter1:Donna Rhoads

Comment Excerpt Text:

[I believe we should form a committee of trail user partners, including equestrians, fishermen and hunters.] Using the 2015 visual resource inventory, allow committee members to make a consensus decision on priorities.

The Board of Directors of SPOT offer to support and/or be part of such a planning committee.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

We also have a concern that prairie view sheds are often not considered when development proposals are advanced. Vistas of rolling prairie, canyons and sky, with little evidence of human activity, are unique and important and are fast vanishing from our landscapes. The BLM needs to consider maintaining such scenic views in a landscape approach to managing our public resources.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

[LWC] Visual Resources:

Classify candidate areas as Class I or Class II "to maintain a natural landscape." Monitor all projects and take necessary actions to any land altering action that could potentially affect visual resources. Use the visual contrast rating system described in BLM Manual 8400 and Visual Resource Inventory BLM Manual H84101.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

Travel corridors crossing BLM managed resources in Huerfano County to and from scenic, cultural, recreational, and historic resources as well as BLM managed resources within view of those travel corridors should be designated Class II Visual Resource Management Areas.

1. Interstate Highway 25 (I-25) views of the Sangre de Cristo, Greenhorn Mountain, and Badito Cone.

[See comment letter for photos.]

2. Westbound Route 160 out of Walsenburg and on to La Veta Pass with valley views towards the Spanish Peaks, Culebra Mountains, and Goemmer Butte; as well as to the north with views of Mt. Mestas and Silver Mountain.

[See comment letter for photos.]

3. County Road 580 leading to Mosca Pass trail which accesses Great Sand Dunes National Park as well as Fourteeners in the Blanca Peak complex, Huerfano State Wildlife Area, and Lily Lake.

[See comment letter for photos.]

4. Huerfano Park corridor to Pass Creek Road beginning at Route 69 Gardner and ending at Route 160 La Veta Pass.

[See comment letter for photos.]

5. North of Route 69 in Gardner BLM lands skirt the Greenhorn National Wilderness Area, access roads to Black Mountain and Blue Springs State Wildlife Areas, and San Isabel National Forest.

[See comment letter for photos.]

6. County Road 520 between Route 69 Badito and Route 160 north of La Veta passing the Silver Mountain dike cluster and the approach to Major's Ranch subdivisions.

[See comment letter for photos.]

7. East Spanish Peak access from Walsenburg along Bear Creek Road which passes many unusual dike formations.

[See comment letter for photos.]

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

Our Visual Resource public comments to the BLM are based on two maps [See comment letter for maps]. One map depicts the assignment of proposed Visual Resource Management classifications. The map is all either Class II or Class III. Class II preserves the scenic quality of the landscape, and requires that gas and oil facilities on BLM managed property should not attract the attention of a casual observer. Class III only partially preserves the scenic quality. There is a Class I that allows practically no change of the natural landscape by human activity. The other map is the BLM Federal Minerals Map. Here is a list of travel corridors nominated for Class II upgrading:

West of I-25, with views of the Sangre de Cristo and Wet Mountains. High traffic volume would dictate that gas and oil development on these smaller BLM plots be screened from the I-25 traveler.

In the Gardner area we have the Pass Creek scenic loop and Red Wing area travel routes towards Mosca Pass and Lily Lake area.

North of Route 69 towards Gardner, Class III BLM lands skirt the Greenhorn National Wilderness Area, access roads to Black Mountain and Blue Springs State Wildlife Areas, and San Isabel National Forest.

Further south, County Road 520 past the Silver Mountain dike cluster and towards the Major's Ranch subdivisions is also worthy of Class II.

The Class III Route 160 corridor headed west out of Walsenburg to La Veta Pass needs the Class II upgrade because of the splendid valley view towards the Spanish Peaks, Culebra Mountains, and Goemmer Butte.

East Spanish Peak access via Bear Creek Road, which has some very interesting dike formations, will also be included in the Class II recommendations.

Commenter1:Mary Ann Flood

Comment Excerpt Text:

At the very least, the following scenic corridors should be upgraded to a CLASS 2 status:

1. West of I¬25 2. The 160 corridor heading west from Walsenburg towards the La Veta Pass

3. In the Gardner area, the Pass Creek loop through Redwing and the Upper Huerfano

4. The entire Gardner road running towards Black Mt and then into the Greenhorn Wilderness area

5. The Silver Mt dike cluster area 6. Dike formations towards the East Spanish Peak via Bear Creek Road. 6. The southern face of the Greenhorn Mts, which includes spiritual retreat centers, alternative communities and residents with strong stewardship and environmental values.

Commenter1:Emil McCain

Comment Excerpt Text:

In addition I recommend that the seven scenic corridors be nominated for upgrading along with the other visual resources worth protecting and be managed for Class II Visual Resource protection

Commenter1:Jim McCain

Comment Excerpt Text:

In addition I recommend that the seven scenic corridors be nominated for upgrading along with the other visual resources worth protecting and be managed for Class II Visual Resource protection

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

NPCA urges close collaboration with individual parks as well as the Night Skies and Natural Sounds Division of the park service in order to establish dark sky targets and to explore potential mitigation measures.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should employ more flexibility in applying scenic quality rating factors to appropriately account for the high value public lands users place on BLM landscapes, such as rolling grasslands and sagebrush sea. Iconic landscapes such as South Park should have VRI designations that accurately reflect their scenic values.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must update VRM classifications for all of the public lands in the planning area based on the Visual Resources Inventory. Specially-managed areas with high conservation values, such as lands with wilderness characteristics, backcountry recreation areas and ACECs, should be managed as VRM I and II to protect scenic values. The RMP must make clear that compliance with VRM classes is not discretionary.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should be actively managing BLM-administered lands for the value of the dark night sky resources they contain. Night skies unimpaired by light pollution are important for the role they play in visitor perception and experience and in various ecological processes.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should explicitly include considerations for night skies in the VRM portion of the RMP as well as management prescriptions for night sky protection.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Commenter2:Kathy Mondragon

Commenter3:Mary Ann Flood

Commenter4:Margi Durrum

Comment Excerpt Text:

At the very least, the following scenic corridors should be upgraded to a CLASS 2 status: 1. West of I-25 2. The 160 corridor heading west from Walsenburg towards the La Veta Pass 3. In the Gardner area, the Pass Creek loop through Redwing and the Upper Huerfano 4. The entire Gardner road running towards Black Mt and then into the Greenhorn Wilderness area 5. The Silver Mt dike cluster area 6. Dike formations towards the East Spanish Peak via Bear Creek Road. 6. The southern face of the Greenhorn Mts, which includes spiritual retreat centers, alternative communities and residents with strong stewardship and environmental values.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Commenter2:Kathy Mondragon

Commenter3:Mary Ann Flood

Commenter4:Margi Durrum

Comment Excerpt Text:

At the very least, the following scenic corridors should be upgraded to a CLASS 2 status: 1. West of I-25 2. The 160 corridor heading west from Walsenburg towards the La Veta Pass 3. In the Gardner area, the Pass Creek loop through Redwing and the Upper Huerfano 4. The entire Gardner road running towards Black Mt and then into the Greenhorn Wilderness area 5.

The Silver Mt dike cluster area 6. Dike formations towards the East Spanish Peak via Bear Creek Road. 6. The southern face of the Greenhorn Mts, which includes spiritual retreat centers, alternative communities and residents with strong stewardship and environmental values.

B.1.13.2. Visual Resources - Baseline Affected Environment

Total Number of Comments: 4

Summary

The BLM should reevaluate VRM Class III areas in Park County and Class "B" ratings in La Veta, La Veta Foothills, and Gardner Basin Units. The BLM should use the South Park scenic viewshed map, available in the Park County Strategic Master Plan (2001; http://coparkcounty.civicplus.com/DocumentCenter/Home/View/315) and consider the pristine night sky qualities of National Park Service units.

See Section 2.3.1.11, Visual Resources (p. 24)

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Night Skies. The NPS units located within or adjacent to the planning area are known for their pristine night skies, resulting from a combination of high elevation, excellent air quality, low population density and frequent cloud-free weather, which affords world-class viewing and enjoyment of naturally dark, star-filled skies. The exceptional unfettered views of the Milky Way, planets, meteors and galaxies have become a major reason for many to visit these NPS units from across the U.S. and around the world

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

Response to the Bureau of Land Management Royal Gorge Field Office Visual Resource Inventory Which was prepared by Logan Simpson 51 West Third Street, Suite 450 Tempe, Arizona 85281

[See comment letter for additional information in the attachment.]

The “B” ratings are entirely in disagreement with the visual proof.

Introduction: We do not think the preparer of this inventory has given justice to the La Veta, La Veta Foothills, and Gardner Basin units. La Veta and Gardner are chosen by numerous artists who receive inspiration from all of the surroundings. Taken as an entire scenic region, it is really impossible to visually separate the lowlands from the highlands. A valley filled with commercial clutter is all too frequently seen in Colorado. People retire, vacation, and relocate here to escape ugly urban landscapes.

Gardner Basin is the access corridor to the spectacular Mount Blanca and Sangre de Cristo back country, as well as the Pass Creek Road scenic resource. Geologists are frequent summer visitors

to the Gardner Basin, more formally known as Huerfano Park by the profession. It contains examples of unique geological features. The following photos are labeled GB for Gardiner Basin, LV for La Veta, and LVF for La Veta Foothills.

After viewing the photos, it is obvious that the ratings need reevaluation. Thank you for correcting this oversight by the Visual Resource Inventory contracting consulatant.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park Co is classified as Class 2 and 3 based on the BLM Visual Resource Inventory posted on the Eastern Colorado RMP website. The County requests that the Class 3 visual areas in Park County be reevaluated. Please work with Gary Nichols of Park County and the US Forest Service to assess these resources, particularly in the South Park area. Communication sites should be discouraged in sensitive viewsheds. The South Park scenic viewshed map is available in the Park County Strategic Master Plan (2001). http://coparkcounty.civicplus.com/DocumentCenter/Home/View/315

National and State Scenic Byways and Resources in Park County include:

-Guanella Pass Scenic and Historic Byway (22 Miles)(AMS P. 201)

-Co Rd. 77 – Tarryall Road Rural Landscape District http://livinglandscapeobserver.net/tarryall/

Commenter1:Suzanne Watson

Comment Excerpt Text:

that the seven scenic corridors should be upgraded to class ll visual resource protection

B.1.13.3. Visual Resources - Impacts

Total Number of Comments: 5

Summary

The BLM should analyze impacts of viewshed management on adjacent, regional, and private property values. The BLM should also analyze impacts on visual resources within National Parks from oil and gas leasing and other development adjacent to National Park boundaries. The BLM should analyze impacts on visual resources in the South Park Master Leasing Plan.

See Section 2.3.1.11, Visual Resources (p. 24)

Commenter1:Eddie Kockman

Comment Excerpt Text:

Visual impacts from actions permitted on federal lands administered by the BLM is one analysis criteria of a MLP. South Park has some of the most specular vistas in Colorado and it is important to maintain them in the future. Analysis of impacts to scenic vistas that may be impacted by oil/gas activities is important within a MLP.

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

What diminution or increase in adjacent, regional or private property values could result from the imposition of buffer zones, viewsheds, conservtion easements, or heritage/cultural area restrictions?

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

· What diminution in adjacent, regional or private property values could result from the imposition of scenic byways, buffer zones, viewsheds, greenways, viewscapes, conservation easements, historical trail designations or heritage/cultural area restrictions?

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

We would like to underscore the importance for the BLM to continue to thoughtfully analyze how the visual resources of the park will be impacted by potential oil and gas leasing and/or development immediately outside their boundaries. Specifically including the infrastructure required for this type of development such as road building, drill pads, haul trucks, and evaporation ponds, all which could diminish the visual quality of these remote, protected landscapes.

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

What diminution or increase in adjacent, regional or private property values could result from

the imposition of buffer zones, viewsheds, conservation easements, or heritage/cultural area restrictions?

B.1.14. Fire

B.1.14.1. Fire - Alternatives

Total Number of Comments: 10

Summary

Commenters had varied input on BLM management direction for fire management. One commenter requested that BLM management include the greatest amount of prescribed fire as

possible. Another stated the importance of allowing fires to burn and minimizing suppression. Other commenters requested that the BLM address fuel loading on a landscape-level scale through both prescribed fire and non-fire fuels program actions. Commenters suggested that the BLM work closely with local and federal agencies, including fire protection districts, in both planning and implementation. Additionally, a commenter suggested that the BLM clarify the use of the US Forest Service Wildland Fire decision support guide. Suggestions for post fire management include management to address post-fire flooding and road closures.

See Section 2.3.1.12, Fire (p. 24)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF strongly supports the use of fire and mechanical treatments as management tools to achieve the desired habitat conditions.

Decades of fire suppression have reduced or nearly eliminated early and mid-seral successional stages across the nation's public lands. Both prescribed burns and historical wildland fire patterns are vital for restoring the understory diversity found in healthy forests and ranges. In many forest types this understory provides crucial forage for elk and other wildlife.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Use of extensive broadcast burning programs, combined with various timber harvests and thinning practices, will help establish and/or sustain a variety of nutritious grasses, forbs, and shrubs that will significantly benefit elk.

Your plans should establish direction regarding how much area will be treated to establish and enhance forage areas for elk, indicate where the treatments will be targeted (which watersheds or other large landscapes), and describe the management activities that will be used to establish and sustain high quality elk forage areas.

Commenter1:Eddie Kockman

Comment Excerpt Text:

As we are all aware wildlife is a threat throughout Colorado and significant effort is being given to actions that will reduce, or mitigate this threat. Certain BLM administered lands do present a wildfire threat that can impact adjacent lands. The greatest threat exists on lands administered by the U.S. Forest Service. Park County has an active program to mitigate wildfire danger on private lands and intends to further expand this program in the future. Wildfire danger and efforts at mitigation, including improving the health of BLM lands should be an objective of a revised RMP and completion of a MLP.

Commenter1:Dan Murray

Comment Excerpt Text:

Do as many control burns as possible, expand Americor to do more of this work as CCC camps during 1920's depression.

Commenter1:Michael White

Comment Excerpt Text:

In meeting its responsibilities for wildland fire management, BLM should work closely with Huerfano County fire protection districts (La Veta, Huerfano County, and Upper Huerfano). BLM decisionmaking should be informed by the "Upper Cucharas River Watershed PreFire Assessment & Treatment Identification" found at http://www.jwassociates.org/cucharas.html.

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

2) To encourage BLM to do controlled burns, I have seen the new roads to perform the burns then used by OHVs burns because these new roads were not adequately closed or obliterated. Thus you now have a whole new OHV trail system not good. Standards to do burns should include proper trail/road closures afterwards

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

I encourage your office to look into the journal, "The Ecological Importance of MixedSeverity Fires: Nature's Phoenix" to gain a better understanding of how logging doesn't create healthier forests but in fact just the opposite. As I'm sure you know, fire is a part of the natural ecological processes and by logging the area, I argue you're creating conditions for a more catastrophic fire while simultaneously destroying wildlife habitat. Furthermore, forests need periodic low to moderate fires to ensure they remain healthy and fully functioning. Mitigating these types of fires through selective harvesting removes important trees that could either grow to become fire resistant to these type of fires, or better yet contribute to the area's natural fire regime. Current science suggest we now have less, mixed intensity forest fires than what previously occurred . I'm concerned that your current management prescription for the area is doing more harm than good. Allowing more fires to burn will lead to healthier forests and thus better wildlife habitat.

Commenter1:Tom Mowle

Comment Excerpt Text:

Fuels management should continue where necessary for forest health, but only in areas where it may be done without significant permanent impact to sensitive habitats and ecosystems. Any temporary routes constructed for this purpose must be rehabilitated and blocked so they are not appropriated for motorized recreation.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Colorado Parks and Wildlife has been working diligently with BLM over the years to conduct habitat treatments that benefit both wildlife and fuels reduction goals within the Arkansas River Valley. It is the desire of Colorado Parks and Wildlife that BLM engage in a landscape scale approach to forest treatments that focus on landscape restoration with multiple resource objectives throughout the Arkansas basin. This type of analysis would foster long-term collaboration from multiple partners as well as provide the public and partners a broader look at where forest restoration will happen on the landscape. CPW understands the challenges of prescribed f ire but believes that true habitat restoration cannot occur without the increased use of prescribed fire. We feel that these strategies will greatly influence wildlife population objectives that CPW is trying to obtain for the benefit of Colorado's wildlife.

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

An essential component of the BLM's role in protecting public safety, property and natural resources from the effects of catastrophic wildfire in Easter Colorado (and specifically the Upper Arkansas River Basin) is a comprehensive management approach that appropriately identifies and addresses specific risks to regional values related to wildfire – and just as importantly post-fire conditions including catastrophic flooding and debris flows. As part of the current Resource Management Plan update, it is imperative that BLM consider how to improve its existing management policies (e.g. the existing Fire Management Plan) and practices (e.g. fuels reduction, fire management decision making, and post-fire emergency stabilization and rehabilitation) to better understand and mitigate the potential risks of wildfire and post-fire hazards. Specifically, BLM should consider greater participation with other federal, state, and local stakeholders and land management agencies to best address dangerous forest fuel loads – at a landscape scale – through the use of prescribed fire and its non-fire fuel program. Regarding fire management decision-making, the BLM should determine and clarify its use of the USFS Wildland Fire Decision Support Guide currently under development within the PSICC during suppression efforts. Finally, the BLMmust develop much more robust policies and practices to address post-fire flooding and debris flows that are often just as dangerous as catastrophic wildfire itself. Utilities has had significant experience and developed substantial knowledge regarding the mitigation of catastrophic wildfire and post-fire conditions – especially following the 2012 Waldo Canyon Fire and chronic post-fire flooding and debris flows.

B.1.15. Lands with Wilderness Characteristics

B.1.15.1. Lands with Wilderness Characteristics - Alternatives

Total Number of Comments: 48

Summary

The following management units should be considered as lands with wilderness characteristics: Crampton, Sangre de Cristo Foothills, Browns Canyon South, Booger Red, Deer Haven, Table Mountain, Echo Canyon, Cooper Mountain, Thompson/Gibble/Twin Mountain, Upper Red

Canyon, Reinecker, Badger Creek South, Cucharas Canyon, Sand Gulch, Stanley Creek, Arkansas Canyon, Badito Cone, Jack Hall Unit, and Beaver Creek WSA. The BLM eliminated many units from consideration unnecessarily because of human impacts that had been overstated; the discrete areas where human impacts have occurred could be excluded from the lands with wilderness characteristics area (as was done in the Wild Connections report). The BLM should reference the data and findings of Wild Connections in determining an area's lands with wilderness characteristics status. The BLM should manage all of Wild Connections' wilderness inventory as lands with wilderness characteristics. Strong protections need to be applied to lands with wilderness characteristics. They should be closed to motorized use, oil and gas leasing, energy resource development, mining, livestock grazing, commercial timber and biomass harvest, fuel wood collection, post and pole cutting, Christmas tree cutting, fuel reductions, mechanical or chemical shrub or tree reduction and removal projects, and military training. Alternatively, the BLM should ensure that traditional uses such as forest thinning, weed-control efforts, reseeding, and wildlife water source construction are considered and supported where possible. They should not be available for exchange or disposal. The EIS should identify ways to avoid, minimize, or mitigate impacts on these areas. The EIS should recognize the importance of wildlife needs and tourism's economic benefit in natural areas.

See Section 2.3.1.13, Lands with Wilderness Characteristics (p. 25)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Implementation and management of projects such as forest thinning, prescribed burning, weed control efforts, reseeding, and construction of wildlife water sources requires the assurance of reliable access and the ability to use mechanized equipment. When considering resource management options and restrictions for LWC or other protective allocations, BLM should ensure that these traditional uses and beneficial wildlife activities are fully considered and supported wherever possible.

Commenter1:Dustin Huntsman

Comment Excerpt Text:

The Bureau of Land Management should identify all lands with wilderness characteristics in the Eastern Colorado area and protect them from destructive activities, like oil and gas drilling, mining, and development projects.

Commenter1:Christopher Keefe

Comment Excerpt Text:

The Bureau of Land Management should identify all lands with wilderness characteristics in the Eastern Colorado area and protect them from destructive activities, like oil and gas drilling, mining and grazing.

Organization1:The Pew Charitiable Trust

Comment Excerpt Text:

I value the wild, natural, and outstanding public lands that I can find in the Eastern Colorado area. These undeveloped landscapes, ranging from grassland prairies to alpine meadows, represent an important piece of Colorado's natural heritage and economy. BLM should protect our remaining wild lands that offer high value recreation like hunting, fishing, hiking, and climbing

Commenter1:Sally Mathewson

Comment Excerpt Text:

I strongly support the land areas listed in the Wild Connections Inventory and Plans for lands with Wilderness Characteristics. There are areas of great beauty with opportunities for primitive recreation and solitude. These wilderness areas are also important for unique biodiversity and include vital corridors for wildlife and riparian areas. These lands should be kept roadless and closed to all oil and gas leasing. Pease preserve all the lands listed on the Wild Connections Inventory as Lands with Wilderness Characteristics.

Commenter1:Marcia Beachy

Comment Excerpt Text:

Our lands are precious to us. Please place your emphasis on conservation. As an informed Sierra Club member I am advocating that the BLM utilize a management tool called Lands with Wilderness Characteristics for about a dozen different areas. I want to see these lands closed to mining, oil and gas companies and recreational vehicles. There are plenty of lands already available for these activities.

Organization1:Pew Charitable Trusts

Commenter1:Ken Rait

Comment Excerpt Text:

Recommendation: For lands the BLM identifies to maintain wilderness characteristics in the Eastern Colorado RMP, we urge the agency to apply appropriately strong management prescriptions that will, in fact, ensure that wilderness characteristics on identified units are maintained over the lifespan of this planning decision. Specifically, we recommend applying substantive protections to conserve the wilderness characteristics of deserving areas. This will most effectively preserve the naturalness of, and outstanding opportunities for solitude and/or primitive recreation on those lands.

Commenter1:Will Pirkey

Comment Excerpt Text:

I am most concerned about lands near Texas Creek, including Table Mountain and Echo Canyon. This specific area contains sensitive winter range for elk, is a bighorn sheep production area, and has a significantly high level of biodiversity. The Colorado National Heritage Program has recognizes two very high biodiversity areas within this unit and has listed them as recommended Conservation Areas. My wish is that you will do the same by managing the area around Table Mountain and Echo Canyon as lands with wilderness characteristics that is closed to any oil gas development, mining, mechanized logging, and motorized recreation.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

We urge BLM to manage LWCs to protect their wild character by methods such as:

- Close some lands to oil and gas leasing and timber harvest
- Close all LWCs to motorized recreation and prohibit new permanent and timber logging operations
- Ban military training activities
- Ensure that wilderness characteristics are accounted for in implementation-level decisions and impacts are avoided, minimized and/or mitigated to the extent possible.

Commenter1:Dee Dubin

Comment Excerpt Text:

I support the data findings of Wilderness Connections who has done significant work documenting and organizing this detailed information. Please use your new plan to protect and expand wilderness areas for us to enjoy.

Commenter1:Rob Dubin

Comment Excerpt Text:

As a current resident of Chaffee county I can say without a doubt a big part of the reason I moved to the county was the ability to hike and mountain bike on trails that do not allow our nature experience to be marred by the sound of motors, the grazing (and often overgrazing) of cattle or the sound of drill or chainsaw.

We hope your upcoming management plan will place a heavy emphasis to maintaining as much acreage as possible in its natural state.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

BLM Instruction Memo No. 2013106 (BLM 2013) states that "[t]he primary function of an inventory is to determine the presence or absence of wilderness characteristics. Keeping an inventory current requires gathering information and ensuring that all inventories have permanent files. It is essential that an adequate record of the inventory and subsequent updates be maintained to ensure proper documentation of inventory findings, including relevant narratives, maps, photographs, new information, and any other relevant information.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

In addition, it is critical that the agency identify impacts to LWC and ensure that NEPA analysis evaluates both ways to avoid impacts to LWC and ways to minimize or mitigate those impacts as part of authorizing actions.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

To ensure consistency in those lands identified as having wilderness characteristics, there are some lessons to be learned in past inventories (PEW et al. 2013):

1) The importance of not disqualifying areas based on sights, sounds or other human

impacts from outside the unit, unless they are pervasive and omnipresent.

6310.6(C)(2)(b)(iii), and 6310.6(C)(2)(c)(i).

2) The importance of not disqualifying areas based solely on the lack of vegetative or

topographic screening. 6310.6(C)(2)(c)(ii).

3) The importance of not disqualifying areas based on a finding that outstanding

opportunities exist in only a portion of the area. 6310.6(C)(2)(c), and

4) The importance of not comparing areas with other parcels, rather than judging them on their own merits. 6310.6(C)(2)(c).

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Fire Management:

Do not prescribe fire where infestations of fire brome exotic species may occur post fire. Reclaim any impacts from vehicle use after a fire in lands with wilderness characteristics. Prohibit post fire vegetation treatments using mechanical equipment in lands with wilderness characteristics.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Exclude lands with wilderness characteristics from fuel wood collection, biomass harvest, Christmas tree cutting, post and pole cutting, fuel reductions, and mechanical/chemical shrub and tree reduction and removal projects.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Wilderness Characteristics Inventories

BLM should complete and then update wilderness inventories for those lands with wilderness characteristics. Ideally, the inventory should be done prior to or during scoping, so that there's sufficient time for groups to work with the BLM to incorporate citizen inventories. At a minimum, we recommend that such inventories be conducted or updated prior to when comprehensive land use plans are issued or revised.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

While 6310 has good language for reviewing and assessing citizen inventories, the agency is variable in how it responds to "new information." We urge the agency to consistently take a close look at citizen's inventories both prior to a DEIS and in the DEIS itself.

Commenter1:Karyn Ames

Comment Excerpt Text:

Please manage Lands with Wilderness Characteristics to protect their wild character and give them strong levels of protection. For example:

- Close all LWCs to motorized use and prohibit new permanent and temporary roads.
- Close to oil and gas leasing and commercial timber harvest.
- Military training activities, including landings associated with High Altitude Mountain Environment Training, should not be allowed.
- Ensure that wilderness characteristics are accounted for in implement at ionlevel decisions and impacts are avoided, minimized and/or mitigated to the extent possible.

Commenter1:Tom Mowle

Comment Excerpt Text:

Finally, but perhaps most importantly, lands should be managed to maintain their natural character, especially in areas near the Arkansas Canyon, in the Sangre de Cristo foothills, and between Canon City and Cripple Creek. The BLM should adopt the inventory of Lands with Wilderness Characteristics proposed by Wild Connections.These LWCs, as well as Areas of Critical Environmental Concern and Wilderness Study Areas, should be managed in a way that does not degrade their wilderness or environmental characteristics – no motorized recreation, no creation of new roads within them, no surface occupancy for fluid or solid mineral extraction.

Commenter1:Chas Clifton

Comment Excerpt Text:

North of Cañon City, I recommend expanding the Beaver Creek, Cooper Mountain, and Booger Red/The Bank areas for the wilderness qualities.

Commenter1:Chas Clifton

Comment Excerpt Text:

Further to the southeast, the BLM should extend the protected area of Cucharas Canyon and Badito Cone. Again, these are loweraltitude areas with good wilderness potential. Badito Cone pairs well with the San Isabel National Forest's Greenhorn Mountain Wilderness, extending it to loweraltitude ecosystems and protecting roadless areas for wildlife

movement and reproduction.

Organization1:The Wilderness Society

Comment Excerpt Text:

The Bureau of Land Management should identify all lands with wilderness characteristics in the Eastern Colorado area and protect them from destructive activities, like oil and gas drilling and mining.

Commenter1:James Lockhart

Comment Excerpt Text:

Wild Connections has surveyed the resource area and found wilderness characteristics in 24 areas, considerably more areas and more acreage than the BLM's survey. I believe that the Wild Connections survey more accurately reflects the factors that should be considered in the resource management planning process, and ask that its data for these areas be considered in making planning decisions for the region. The unimpacted character of these areas presents opportunities to treat them as core areas to promote wildlife values and connectivity across the landscape and protect biodiversity. It also makes them suitable for primitive recreation. The BLM should preserve their roadless character and exclude intensive uses such as oil and gas or other energy development, mining, logging or intensive fuels treatments.

Commenter1:Emil McCain

Comment Excerpt Text:

I advocate for the BLM to close all LWC's to motorized use and prohibit new permanent and temporary roads. Also these two LWC's and the 1 ACEC should be closed to oil and gas leasing and commercial timber harvest.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

I advocate for the BLM to close all LWC's to motorized use and prohibit new permanent and temporary roads.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

[Stanley Creek LWC, Badito Cone LWC, and The Cucharas Canyon ACEC] These two LWC's and the 1 ACEC should be closed to military training activities, including landings associated with High Altitude Mountain Environment Training. We saw the negative effects of a Military Operations Area (MOA) in Huerfano County many years ago.The air traffic at the time was very disturbing, and especially dismaying when one was out in the natural world hiking, camping, fishing, enjoying the peace and quiet that they should offer. There seems to be a big uptick in some kind of training flights going on in the Huerfano Valley right now, and it is very disturbing to experience. No MOA's should be allowed over BLM lands.

Commenter1:Deb Overn

Comment Excerpt Text:

I ask BLM to:

- Close all LWCs to motorized use and prohibit new roads, whether permanent or temporary;
- Close LWCs to oil and gas leasing and commercial timber harvest;
- Restrict military training activities in LWCs, especially aircraft landings;
- Ensure that Wilderness Characteristics are considered even in low-level implementation decisions, and minimizing and mitigating any unavoidable impacts to the extent possible.

Commenter1:Deb Overn

Comment Excerpt Text:

LWCs especially should not be available for timber production.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

To fully protect core wildlife habitat in the four areas above, RMRI recommends designating them with overlapping Wildlife Priority Area and Lands with Wilderness Characteristics designations. Core habitat values can best be protected with these two mutually reinforcing designations managed as follows:

Recommended Management for the 4 areas

a) Do not reduce the size of current blocks of interior habitat by new trails

Wildlife species such as big horn sheep, elk and deer need undisturbed habitat blocks for lambing, calving, forage and movement corridors

b) Do not impair wilderness characteristics introducing human traffic and disturbance that is associated with trails

c) Delete from maps and physically close motorized and nonmotorized trails that have little or no use on the ground

Remove nonmotorized trail designations for trails that no longer exist on the ground as mountain bike trails

d) Do not designate or construct new trails of any kind in these areas, Do not build any trail or other recreation infra¬structure

e) Close trails to motorized and, to the extent possible, to mechanized use

f) Emphasize horse and hiking trails as these trial uses require fewer miles and therefore cause less fragmentation

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability. Identifying, restoring and protecting substantial roadless areas will provide crucial benefits to wildlife, especially to endangered and sensitive species.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should use the below recommendations to reevaluate its inventory that has been completed to date and in considering additional inventory work.

1. GIS analysis can be useful to identify lands meriting field inventory but a desktop inventory is not sufficient.

We recommend field offices begin LWC inventory by conducting a GIS-based roadless analysis of the entire field office or planning area to determine potential lands with wilderness characteristics. For example, most BLM field offices in Colorado completed GIS roadless analyses as a starting point for their LWC inventories, and these types of analyses have proven useful and informative for determining potential LWC units to be inventoried in the field. However, because BLM road data is often faulty or incomplete, and because BLM road data does not differentiate between routes that meet the definition of a "road" for wilderness inventory purposes as defined by Manual 6310, the resulting analyses based on this data is often flawed and/or incomplete and therefore must be verified on the ground. Our experience is that GIS analysis alone is inadequate to ensure that the routes ultimately used to identify boundaries and make size determinations comply with BLM guidance in Manual 6310. BLM must utilize the definition of "wilderness inventory roads"

established in Manual 6310 to assess roadlessness, and field inventory must confirm the existence and present condition of those roads on the ground.

For example, the White River Field Office in northwestern Colorado conducted an initial "desktop inventory" to identify potential lands with wilderness characteristics, using GIS data to determine roadless areas. The Wilderness Society verified the White River Field Office's findings on the ground, and found many errors resulting from inaccurate or outdated GIS data. Specifically, we found two major issues arising from the preliminary inventory:

1. Several parcels were entirely missed by the desktop inventory. Possibly because the BLM's desktop inventory was based on an out-of-date or inaccurate road layer the resulting collection of potential LWC polygons was deficient and missed several blocks of BLM lands that could qualify as LWCs. In particular, several contiguous blocks of unroaded BLM lands less than 5,000 acres in size but that were later found to be adjacent to Wilderness Study Areas were originally overlooked. BLM Manual 6310 is clear that units of less than 5,000 acres in size can meet the size criteria if they are found to lie adjacent to lands currently managed for their wilderness characteristics.

2. The potential LWC units that were identified were often defined by boundaries that do not meet the criteria for boundary delineation laid out in BLM Manual 6310. Manual 6310 states that the boundary delineation for a LWC unit "is generally based on the presence of wilderness inventory roads." BLM Manual 6310 at .06(C)(1). BLM defines a wilderness inventory road as a vehicle route that has "been improved and maintained by mechanical means to ensure relatively regular and continuous use." BLM Manual 6310 at .07. A "way" that is either solely "maintained" by the passage of vehicles, is used regularly but not maintained, or was originally constructed using mechanical means but is no longer being maintained by mechanical methods is not a road. Ibid. Without conducting field visits to these areas with the express intent of assessing whether or not the proposed boundary line meets the definition of a "wilderness inventory road" or other defining feature, it is very difficult to draw an accurate boundary for a potential LWC unit.

We would expect similar errors to occur in any GIS-based desktop inventory. Therefore, while we support utilizing GIS analysis to obtain an initial understanding of the lay of the land, fieldwork is necessary to verify boundaries and assess the presence or absence of wilderness characteristics within potential LWC units.

Notably, after conservation organizations conducted field inventory in the White River Field Office, we submitted comments to the BLM outlining these errors in detailed specific instances, prompting the field office to conduct its own field inventory of those areas. The field office then agreed with our assessment and adjusted its inventory to match our findings.

In addition, we note that the White River Field Office was able to use support from the Student Conservation Association to assist them in completing field inventory under the supervision and direction of BLM staff. This approach can ensure that needed field work is completed even where BLM may have limited resources.

2. Assessment of wilderness characteristics should not be overly conservative and should look at apparent naturalness and the standalone opportunities of each unit.

BLM Manual 6310 directs, "avoid an overly strict approach to assessing naturalness." BLM Manual 6310 at .06(C)(2)(b)(ii)(2). BLM is to assess apparent naturalness, which the manual distinguishes from natural integrity, meaning that naturalness determinations should be based on whether an area looks natural to the average visitor regardless of ecosystem health. Features

listed in Manual 6310 that may be considered "substantially unnoticeable" and thus have no effect on apparent naturalness include trails, spring developments, fencing, stock ponds, and certain types of linear disturbances. Furthermore, the manual specifically states that "undeveloped ROWs and similar undeveloped possessory interests (e.g., mineral leases) are not treated as impacts to wilderness characteristics because these rights may never be developed." BLM Manual 6310 at .06(C)(3)(d).

Impacts to naturalness must be documented to allow the public to adequately review and understand said impacts. BLM should not only photograph and map substantially noticeable human impacts located within the boundaries of a wilderness inventory unit, but should describe in the associated narrative how these impacts, either individually or cumulatively, detract from the apparent naturalness of the unit as a whole. BLM Manual 6310 also requires Route Analysis forms for boundary roads and for routes that are considered to be substantially noticeable impacts to naturalness. These Route Analysis forms are critical to provide the public with the rationale behind naturalness and unit boundary determinations.

We note that Manual 6310 emphasizes the importance of the word "or" in determining whether an area possess outstanding opportunities for solitude or a primitive and unconfined type of recreation: "Determine if the area has outstanding opportunities for solitude or a primitive and unconfined type of recreation. The word "or" in this sentence means that an area only has to possess one or the other. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre, even when an area is contiguous to lands with identified wilderness characteristics. In most cases, the two opportunities can be expected to go hand-in-hand. An outstanding opportunity for solitude, however, may be present in an area offering only limited primitive recreation potential. Also, an area may be so attractive for primitive recreation that it would be difficult to maintain an opportunity for solitude." BLM Manual 6310 at .06(C)(2)(c).

For example, the BLM did not find wilderness characteristics on the Bear Creek unit (COF-020-058), finding that the area does not have outstanding opportunities for solitude or outstanding opportunities for primitive and unconfined recreation. The BLM did not provide photo or geo-data to support this assertion. However Wild Connections' Sangre de Cristo Foothills Contiguous Units LWC report demonstrates that this unit does provide outstanding opportunities for solitude due to vegetative and topographic screening, even if not in the entire unit, as well as provides outstanding opportunity for recreation – referencing the same "popular recreation site" – the Columbine trail (that parallels and crosses the unit's western boundary) that BLM cites, however BLM references this trail as the reason this unit does not have outstanding opportunity for solitude.

Overall, BLM did a good job assessing Land with Wilderness Characteristics for outstanding opportunities for solitude and/or primitive and unconfined recreation. The Bear Creek (COF-020-058) unit is the only one in BLM's current inventory in which the agency did not find wilderness characteristics for this reason.

The manual provides important detailed information for making determinations as to outstanding opportunities, including that BLM should not compare the lands in question with other parcels. Ibid. Each area should be evaluated on its own merits, regardless of whether its qualities are perceived to be common or typical of a planning area, or how it compares to other wilderness-quality lands.

Furthermore, Manual 6310 plainly states that "an area can have wilderness characteristics even though every acre within the area may not meet all the criteria." BLM Manual 6310 at .06(C)(3)(e). BLM should assess the overall qualities of an area, and not disqualify primarily natural areas based on minimal impacts.

Supplemental values should be documented, such as important habitat and other elements of ecosystem integrity. However, the presence or absence of those elements should not affect an area's naturalness for purposes of lands with wilderness characteristics inventory according to Manual 6310.

3. Boundary delineation should be used to define LWC areas, including through adjusting units and cherry-stemming.

BLM Manual 6310 states that the "boundary [for a wilderness characteristics inventory unit] is usually based on the presence of wilderness inventory roads" but can also be based on changes in property ownership or developed rights-of-way. Wilderness inventory roads are further defined as those roads that are "improved and maintained by mechanical means to insure relatively regular and continuous use… A route that was established or has been maintained solely by the passage of vehicles would not be considered a road for the purposes for wilderness inventory, even if it used on a relatively regular and continuous basis." BLM Manual 6310 at .07. As stated above, Route Analysis forms are required to document that routes used as boundaries meet the criteria for wilderness inventory roads.

Where substantially noticeable human impacts do occur within a potential LWC unit, BLM should make an attempt to cut them out of the unit, either through the cherry-stemming of wilderness inventory roads or by cutting out sub-sections of the potential unit entirely, in order to determine if a smaller area can be identified that still meets the size criteria but that doesn't contain substantially noticeable impacts such as wilderness inventory roads, well pads, or other features. Manual 6310 directs BLM to define the area to "exclude wilderness inventory roads and other substantially noticeable human-caused impacts," and that "lands located between individual human impacts should not be automatically excluded." BLM Manual 6310 at .06(C)(3).

4. Manageability considerations should not be part of determining whether lands have wilderness characteristics.

BLM must inventory all potential lands with wilderness characteristics, regardless of potential manageability of those characteristics. This inventory serves as the information base from which BLM makes land use decisions, and therefore must precede planning decisions.

The inventory process should not be conflated with management of lands with wilderness characteristics. BLM should not eliminate areas from inventory because they may be difficult to manage; rather those areas should be inventoried and the full results of those inventories—including road determinations, photographs, and maps detailing the locations of the photographs—should be released for public review and verification. If BLM finds them to possess wilderness characteristics, then BLM can decide whether or how to manage those characteristics. Potential manageability for wilderness characteristics does not affect BLM's obligation to maintain an accurate inventory of wilderness resources on the public lands.

Recommendations: BLM should complete a comprehensive inventory of lands with wilderness characteristics in the planning area, complying fully with the process and definitions set forth in BLM Manual 6310. BLM should consider utilizing GIS analysis to identify potential lands with

wilderness characteristics and follow up with field inventory to identify appropriate boundaries and make determinations as to the presence or absence of wilderness characteristics. The inventory should be a complete, objective assessment of wilderness resources on the public lands, regardless of perceived manageability or other management issues. Inventory findings, including thorough documentation files, should be available to the public prior to the inventory being used to inform management decisions, and BLM should refine and update the inventory based on any new information and/or comments provided by the public.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Given the broad purpose of the preparation of the Eastern Colorado RMP and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include a number of alternatives to protect their wilderness values. This range of alternatives must be consistent with BLM's FLPMA obligations to inventory its lands and their resources, which includes wilderness character. FLPMA also obligates BLM to take this inventory into account when preparing land use plans, using and observing the principles of multiple use and sustained yield. 43 U.S.C. § 1712(c)(4); 43 U.S.C. § 1712(c)(1). Through management plans, BLM can and should protect wilderness character and the many uses that

wilderness character provides on the public lands through various management decisions, including by excluding or limiting certain uses of the public lands. See, 43 U.S.C. § 1712(e).

This is necessary and consistent with the definition of multiple use, which identifies the importance of various aspects of wilderness character (such as recreation, wildlife, natural scenic values) and requires BLM's consideration of the relative values of these resources but "not necessarily to the combination of uses that will give the greatest economic return." 43 U.S.C. § 1702(c).

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should protect all lands with wilderness characteristics in the Eastern Colorado RMP.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Protecting all of the inventoried lands with wilderness characteristics in the Eastern Colorado planning area is the appropriate action to prevent unnecessary and undue degradation to wilderness resources on the public lands. BLM can do this by adopting the recommended three-tier approach set out below in section (v)(2) of these comments.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Furthermore, BLM should maximize protection of wilderness characteristics through layering management. Layering management that protects a variety of resources is an important tool that BLM consistently uses. Protection of wilderness characteristics can be effective as a standalone management approach but is also effective along with designation of ACECs and other conservation-oriented designations, as well as portions of special and extensive recreation management areas.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should base management decisions on the analysis of the affected environment and environmental impacts.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The RMP should document and analyze the uses, trends, resources of each unit in order to come up with and justify management prescriptions that are appropriate to specific units. The affected environment discussion in the RMP should assess individual LWC units as to the current and trending uses of those lands, including both values (such as backcountry recreation opportunities) and threats (such as interest in energy development). The environmental impacts analysis and alternatives should reflect the current conditions, including by evaluating management alternatives that ensure protection of existing values and/or target specific threats.

Recommendations: The RMP should clearly tie the analysis of the affected environment and environmental impacts to the alternatives and ultimately to the management decisions. Individual

lands with wilderness characteristics units should be assessed on their own merits and threats, and management decisions should be considered that are appropriate to the current and trending uses of those lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should set baseline management actions that will ensure appropriate protection of all LWC units being prioritized for protection of wilderness characteristics. Baseline management must include: closed or NSO stipulation for fluid minerals; no construction or maintenance of roads; closed to renewable energy development; ROW exclusion/avoidance; closed to solid mineral leasing and saleable minerals; and retain in federal ownership. From this baseline, BLM can and should consider tailoring management prescriptions to individual units or categorizing units based on specific threats to wilderness values and supplemental values that are present. This approach is similar to BLM's management of ACECs, where relevant and important values must be protected but the management actions are developed based on the threats to those values and the opportunities to enhance and experience them.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

For the Eastern Colorado RMP, we recommend BLM manage lands with wilderness characteristics in three categories: very high quality LWC meriting the strongest levels of protection; additional LWC managed primarily for the protection of wilderness characteristics; and remaining inventoried LWC where management for other multiple uses besides wilderness is emphasized. All three categories, including inventoried LWC where management for other multiple use values besides wilderness is emphasized, should include management direction to consider impacts to wilderness characteristics in implementation-level decisions and avoid, minimize or mitigate those impacts to the extent possible.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

(1) Very high quality LWC meriting the strongest levels of protection

This management category (Category 1) should include citizen-proposed Wilderness Areas and LWC that may be designated Wilderness and as such demand very strong protections to preserve their wilderness qualities. We recommend Badger Creek North and South, Cooper Mountain,[14] Table Mountain and Echo Canyon, and WSA-contiguous LWC with Browns Canyon, McIntyre Hills, Upper and Lower Grape Creek, and Beaver Creek be included in this category. Management prescriptions should include:

-Closed to oil and gas leasing and non-waivable NSO stipulation for fluid minerals

-Closed to renewable energy development

-Closed to new rights-of-way (ROW exclusion)

-Closed to motorized and mechanized use

-Construction of new permanent and temporary roads is prohibited

-Close to mineral material disposal and non-energy solid leasable mineral exploration and development

-Recommend withdrawal from locatable mineral entry

-Closed to commercial timber harvest

-Vegetation treatments must utilize the minimum tool necessary

-Seek opportunities to acquire and incorporate non-federal inholdings

-Retain lands in federal ownership

-Close area to military training activities, including landings associated with High Altitude Mountain Environment Training.

(2) Additional LWC managed primarily for the protection of wilderness characteristics

This management category (Category 2) should include the majority of inventoried lands with wilderness characteristics, and should manage LWC with the objective of protecting wilderness characteristics over other multiple uses. Management prescriptions should include:

-NSO stipulation for fluid minerals without exception, modification, or waiver.[15]

-Closed to renewable energy development

-Closed to new rights-of-way (ROW exclusion) outside of designated utility corridors

-Closed to motorized use

-Mechanized use limited to designated routes

-Construction of new permanent and temporary roads is prohibited

-Close to mineral material disposal and non-energy solid leasable mineral exploration and development

-Recommend withdrawal from locatable mineral entry

-Closed to commercial timber harvest

-Vegetation treatments must not have long-term impacts on wilderness characteristics

-Seek opportunities to acquire and incorporate non-federal inholdings

-Retain lands in federal ownership

(3) Remaining inventoried LWC not prioritized for protection

Inventoried LWC not prioritized for protection of wilderness characteristics should nonetheless be ascribed management direction to ensure that wilderness characteristics are accounted for in implementation-level decisions and impacts are avoided, minimized and/or mitigated to the extent possible. As stated above, BLM has adopted this approach in the Rio Puerco RMP and White River RMPA.

Analyzing alternatives that would "avoid or minimize" adverse environmental effects is a requirement of NEPA, and current guidance outlined in Manual 6320 states that land use planning efforts should consider several outcomes for lands with wilderness characteristics. BLM should not simply analyze alternatives that would protect or leave unprotected lands with wilderness characteristics, but can also consider additional management options for these lands, where other multiple uses are emphasized "while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics." BLM Manual 6320 at .06(A). In fact, even for areas where BLM specifically decides to not protect wilderness characteristics, BLM is still required to "consider measures to minimize impacts on those characteristics." BLM Manual 6320 at .06(A)(2)(d).

Recommendations: BLM must adopt robust management prescriptions for lands managed to protect wilderness characteristics, as outlined above. BLM should consider a variety of management regimes for lands identified as possessing wilderness characteristics but not prioritized for protection to allow for management of other multiple uses in conjunction with maintaining wilderness characteristics.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Several hunting and fishing based conservation organizations submitted an additional comment letter requesting the inclusion of Backcountry Conservation Areas (BCAs) in the preferred alternative of the Eastern Colorado RMP. There is the potential that some lands in the Royal Gorge Field Office that are proposed for BCA designation by the sportsmen's community will also be found to possess wilderness characteristics. When considering how to manage these lands with BCA/LWC overlap, we encourage you to consider the following:

Under U.S. Department of Interior, Bureau of Land Management, Manual Transmittal Sheet, Release 6-130, dated 03/15/2012, Subject; Manual 6320, the document states…

"Procedures for Considering Lands with Wilderness Characteristics in Land Use Planning. The BLM will evaluate lands with wilderness characteristics through the land use planning process. When such lands are present, the BLM will examine options for managing these lands and determine the most appropriate land use allocations for them. Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; (3) the protection of wilderness characteristics as a priority over other multiple uses. The BLM will continue to engage cooperating agencies, the public, and other interested parties in the land use planning process as it relates to the management of lands with wilderness characteristics."

In circumstances where this overlap exists, the BCA designation gives BLM the opportunity to manage these lands according to this policy; specifically as a variation of option (2) "emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics." The BCA approach would help to maintain as much of the wild character of these places as possible while providing for management flexibility and retention of existing uses. To determine the resource allocations that are most appropriate for BCA designated areas, we encourage you to evaluate the supplemental information in Appendix C.

Commenter1:Claude Neumann

Comment Excerpt Text:

Draft Alternatives – The Federal Lands Policy and Management Act effectively mandates the BLM conduct and maintain inventories of lands with wilderness characteristics and analyze the effects on these lands in land use planning. With this in mind, I encourage the BLM to produce management alternatives reflective of these considerations and one that will properly evaluate all the impacts.

Commenter1:Claude Neumann

Comment Excerpt Text:

Management of the Lands – I encourage the BLM to develop strong measures, already provided for in the law, to protect those lands identified with wilderness characteristics. These include the prohibition of construction of new roads, designations of areas closed to motorized use, control of or closure to oil / gas / mineral leasing, prohibition of other structures such as pipelines / utility corridors from these areas, and other measures to assure maintaining wilderness values. New designations for needs whose importance has evolved over time are also most important. The recognition by science that habitat fragmentation is detrimental to wildlife species and continues at a rapid pace underscores the value of protection. Likewise, this rapid loss of contiguous open space threatens future generations in their ability to achieve solitude and quietness that is so highly valued. The ability of one to enjoy special places along the busy Arkansas River corridor and highway to quieter places such as Table Mountain are an investment in our children's future so that they may enjoy what wilderness offers.

Organization1:Greater Arkansas River Nature Association (GARNA)

Commenter1:Alison Ramsey

Comment Excerpt Text:

We support the preservation and protection of wildlife habitat corridors – another recommendation put forth by Wild Connections. The expanded Land with Wilderness Characteristics pattern recommended by Wild Connections fulfils this objective more effectively than what is considered in the BLM's 2013 analysis.

Organization1:Greater Arkansas River Nature Association (GARNA)

Commenter1:Alison Ramsey

Comment Excerpt Text:

We ask that the BLM give high levels of protection to lands with Wilderness Characteristics to protect their wild character for future generations.

Commenter1:William Carter

Comment Excerpt Text:

Thank you for the opportunity to make a comment on the BLM Eastern Colorado Resource management plan. I would like relate my comment to a recent wilderness hike that was recommended to me by a new friend at Conservation Colorado . Last weekend my wife and I hiked the Beaver Creek Loop Trail that is in the Beaver Creek Wilderness Study Area . Having now experienced this area first hand, I believe it should be protected and designated to be a Land With Wilderness Characteristics , reasons for which I will elaborate on in this comment.

Commenter1:Alan Robinson

Comment Excerpt Text:

I would like to encourage the RMP to include within its scope a consideration of one specific potential LWC designation, that of the Browns Canyon South LWC. Your own 2014 survey of that area indeed concluded that the 2,500ac has LWC as does the 2015 Wild Connection report. I hope that this convergence of conclusions will encourge you to formally decalre this LWC. I further recommend that you include it within the scope of the RMP, and not defer its consideration until the development of the Browns Canyon National Monument Management Plan. It is my concern that if you do so there will be an inordinate and ultimately biased discussion of its qualification primarily due to the politics of the proclamation of the Monument. I believe that this would overshadow the objective process with your own guidelines for LWC evaluation establish. Please consider this comment as an elaboration of my recent submission concerning the LWC issue generally.

B.1.15.2. Lands with Wilderness Characteristics - Baseline Affected Environment

Total Number of Comments: 64

Summary

The BLM was correct in its finding of areas qualifying as lands with wilderness characteristics. The BLM should not have disqualified many areas as lands with wilderness characteristics. The BLM should find the following as lands with wilderness characteristics: Booger Red, Deer Haven, Upper Red Canyon, Reinecker Ridge, Cooper Mountain, Badger Creek South, Grand Canyon Hills, Crampton Mountain, Cucharas Canyon, Thompson/Gribble/Twin Mountain, Table Mountain/Echo Canyon, Stanley Creek, South Badger Creek, Arkansas Canyon from Browns Canyon to Royal Gorge, Thirty-one Mile Mountain, Waugh Mountain, and Grape Creek adjacent parcels. The BLM should consider the Wild Connections study recommendations. The RMP should emphasize the importance of wildlife corridor connectivity and contiguity, which should be preserved and fostered. The RMP should consider areas connecting State Wildlife Areas to other natural areas for the combined effect (and area) that would be protected.

The BLM eliminated many units from consideration unnecessarily because of human impacts and vegetation treatments that had been overstated. The solitude, naturalness, and supplemental values of the areas that did not meet the BLM criteria should have outranked these impacts. They should be closed to motorized use, oil and gas leasing, energy resource development, mining, livestock grazing, commercial timber harvest, and military training. They should be preserved for wildlife, wildlife habitat, and primitive recreation.

See Section 2.3.1.13, Lands with Wilderness Characteristics (p. 25)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF strongly encourages the BLM to carefully consider the historic, current, and future needs of wildlife and hunters when evaluating management options for LWC during the land use planning process.

Commenter1:Bob Wagstaff

Comment Excerpt Text:

Booger Red: I hiked this area in late June, 2015. The hike was from the parking area about four miles in and four miles back out. Striking features of the area included great views into the valley, tremendous numbers of wild flowers in blook, solitude, several streams and for the most part the lack of development visible. I would hope to see the area preserved against development especially motorized developments.

Booger Red lies geographically in proximity to Deer Haven which I hiked earlier in the week of my Booger Red hike. Deer Haven was an astonishing place with wildflowers in abundance, spectacular views from Thompson Point and the solitude of having hiked the whole day seeing only one group of people.

Commenter1:Kelsey Ashton

Comment Excerpt Text:

A majority of human impacts in this area are masked with vegetation which negates the BLM's finding that this unit is not primarily natural in appearance. An example of this can be seen in the unit's northern border where all one sees is an unrestricted, densely vegetated mix of forest and rolling hills stretching toward the horizon. It should also be highlighted that this area's topology and vegetation creates a buffer from unnatural sights and sounds which provides visitors the opportunity to seek solitude and an escape from human development pressures. Because of this buffer, Upper Red Canyon provides ample opportunities for primitive and unconfined forms of recreation such as hiking, sightseeing, photography, and backpacking. The area challenges visitors to use topographic maps and a compass in order to successfully navigate the terrain.

Commenter1:Sasha Nelson

Comment Excerpt Text:

The Reinecker Ridge area is contiguous with the 17,429 acre James Mark Jones State Wildlife Area. The State Wildlife Area is managed to retain its natural values, backcountry recreation experiences, and wildlife habitat. Additionally the wildlife area resides along the unit's eastern border and actually contains the majority of Reinecker Ridge itself.

Commenter1:Sasha Nelson

Comment Excerpt Text:

The [Reinecker Ridge] area has few entry points, but offers a number of trails for ample opportunities for solitude. The mixed forests found throughout provide excellent screening from unnatural sights and sounds. As well as important wildlife habitat. The area is part of a greater ecological connectivity core and has been found to contain significant to very high levels of biodiversity by the Colorado Natural Heritage Program (CNHP). Additionally, it is within CNHP's biodiversity assessment of the greater South Park mega site which contains globally rare and unique rich fen wetlands as well as plants that are both rare within the state and across the world.

Commenter1:Lilly Zoller

Comment Excerpt Text:

It is important to protect this area [Copper Mountain Unit] because it contains a vast amount of land with high topographic relief and that thick vegetation which provides excellent audible and visual screening from any human development. This provides opportunities for primitive recreation for hikers, backpackers, wildlife viewers, photographers, and anyone else seeking a natural experience.

Commenter1:Lilly Zoller

Comment Excerpt Text:

specifically in regards to the Cooper Mountain Unit. I feel this area strongly exemplifies wilderness qualities and meets the necessary criteria due to the fact that natural processes are reclaiming disturbed lands and there is an overall lack of motorized recreation throughout the unit

Commenter1:344945

Comment Excerpt Text:

I wish to state my unequivocal support for all of the land areas listed in the Wild Connections Inventory and Plans for Lands with Wilderness Characteristics. I personally have had the pleasure of hiking in the following areas: Badger Creek, Hindeman Gulch, Hole in the Rock Gulch, and East Beaver Creek (Turkey Creek Canyon). I have found these natural areas to be of great beauty and solitude. The opportunities for primitive recreation are exceptional as well. These areas are overwhelmingly deserving of the status " Lands with Wilderness Characteristics." These roadless areas, aside from their scenic beauty are important due to their unique biodiversity, including vital corridors for wildlife, important riparian areas, and mixed coniferous forests, state parks, wilderness study areas, areas that already have conservation easements, and/or are over 5,000 acres. These factors add to their value as LWC's. Furthermore, these lands should be closed to all oil and gas leasing, and kept as roadless areas with no motorized vehicles.

Commenter1:Brien Webster

Comment Excerpt Text:

This unit [Bader Creek South] also offers outstanding opportunities for sportsman, hikers, and wildlife viewing. Badger Creek offers an escape from man-made disturbances. The area's topographic relief and abundant vegetation

provides ample opportunities for solitude, sightseeing, and communion with nature.

Badger Creek provides excellent primitive recreation due to the unique topography, undeveloped

facilities, and non-motorized recreation possibilities. This unit has served hikers, anglers, sportsman, and nature enthusiasts for years. For those wishing to get into the high country there are opportunities to view incredible landscapes including the Sangre De Cristos, the Collegiates, and the Arkansas River Canyon.

Commenter1:Jordan Bresson

Comment Excerpt Text:

I am particularly fond of the Grand Canyon Hills due to its sparse entrances and vast array of trails, which creates a sense of solitude when spending time in this area. There aren't very many

places left in Colorado that can provide you with that peace of mind and isolation. When I'm trying to get away from the hustle and bustle of the city, I always enjoy the luxury of being able to clear my head by camping. Not only that, but the Grand Canyon Hills allows me to choose from a variety of campsites that are tucked away throughout the area.

Commenter1:Jordan Bresson

Comment Excerpt Text:

At the present time, Grand Canyon Hills doesn't seems to experience much traffic from motorized vehicles, and I hope we can continue that pattern. Not only does this lack of traffic allow for us to appreciate our time spent here, but there are also a great deal of birds that currently reside in the Grand Canyon Hills. By developing these lands and bringing more traffic into its areas, I fear that we will push out these species that have inhabited this area for so long.

Commenter1:Jordan Bresson

Comment Excerpt Text:

if we continue to develop in lands such as these, lands I believe the BLM refers to as lands with wilderness charm, then what will be left for us to enjoy? I hope that future generations will be able to experience the greatness I've felt while spending time in these areas. These are just some of the reasons why we cannot allow oil and gas drilling to occur in areas such as these.

Commenter1:Martha Silva

Comment Excerpt Text:

I hope that BLM considers that there are recreation opportunities at Crampton Mountain with a wildlife habitat. It is an extremely distinctive area and should be preserved. My friends and I love the outdoors and know that people can hike and enjoy the peaceful scenery at Crampton Mountain. It would be dissapointing for many Coloradans if this were to change during BLM's planning process for this beautiful place that many call home

Commenter1:Martha Silva

Comment Excerpt Text:

It is important that we protect Crampton Mountain which is a habitat for black bear, elk, pronghorn, mule deer, mountain lion, Alberts squirrel, Brazil freetailed bat, Gunnison's prairie dog, bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and Great Blue heron

Commenter1:Martha Silva

Comment Excerpt Text:

In the Wild Connections citizen inventory report Wild Connections rightfully excludes many of the unnatural impacts referenced by the BLM in their wilderness characteristics report. By removing Fremont County Road 307A, Fremont County Road 21,tranmssion access route, and BLM TMP roads this land should now be considered as lands with wilderness characteristics.

Commenter1:Brien Webster

Comment Excerpt Text:

I encourage the BLM's Royal Gorge Field Office to manage the Grand Canyon Hills Unit as a Land with Wilderness Characteristics. The unique landscapes , historic elements, and the presence of critical and valued wildlife species present in this unit provides an incredible opportunity to experience and understand our cultural heritage in its purest form.

Commenter1:Brien Webster

Comment Excerpt Text:

Many routes in the Grand Canyon Hills are not utilized by motorized recreationists and show an overall apparent lack of regular use. There is an opportunity for incredible and uninterrupted solitude in this unit. Whether, taking a moment at Grape Creek (a relatively rare perennial stream for this area), to watch the great blue heron stalk its prey, or to reflect upon our nation's history, when coming across a railroad tie or historic waterline, this unit provides unique opportunities worth preserving. The area's topographic variety combined with few entry points and interior trials provide great opportunities for those seeking solitude. There are great opportunities for primitive camping at several dispersed campsites throughout the unit's interior sections.

Commenter1:Brien Webster

Comment Excerpt Text:

It is also important to note that although the BLM cited minor impacts from forestry thinning in 2003 [in the Grand Canyon Unit, they also stated that this impact is largely unnoticeable and does not affect the area's overall natural character

Commenter1:Brien Webster

Comment Excerpt Text:

It is important to note the presence of critical and valued bird species (great blue heron, osprey, Mexican spotted owl, bald eagle, and American Falcon) that have been identified in this unit [Grand Canyon Hills].

There are also opportunities to see species such as bighorn sheep, black bear, mule deer, white tailed deer, pronghorn, mountain lion, Brazilian free tailed bat, and Gunnison's prairie-dog.

Commenter1:Carrie Miller

Comment Excerpt Text:

Thank you for the opportunity to comment on the potential use of the Booger Red natural area. I am particularly familiar with this area and respect it for its natural landscape, enjoy the wildlife that inhabits the area, and enjoy the trail system maintained by the Rocky Mountain Back Country Horsemen association also.

I encourage the BLM to continue to leave this area [Booger Red Natural Area] as a pristine natural wild land; not allow motorized vehicles in the area unless there is an emergency fire, rescue or timber assessment similar to the Deer Haven BLM area in place

Commenter1:Carrie Miller

Comment Excerpt Text:

This area [Booger Red Natural area] is also under direct imminent threat from the HAMET which I oppose also, let the Army use the land they currently own vs encroaching into one of the last natural spaces in the area.

Commenter1:Carrie Miller

Comment Excerpt Text:

I am against the allowance of any 4 wheelers and motorcycles also [in Booger Red Area]. These vehicles can do more harm in 5 years to an area than any horseback traffic has done to the entire United States in 400 years

Commenter1:Karl Ford

Comment Excerpt Text:

Upper Red Canyon (Booger Red Hill) Lands with Wilderness Characteristics

Naturalness: BLM found that many man-made features are found within the unit. The accumulative impacts of the features affect the natural character of the unit; therefore, the unit does not possess wilderness characteristics. The man made features include, mining activity, mechanically constructed routes, and historic right-of-ways (ROWs) with linear disturbances. The man made features are highly visible throughout the unit and are a significant impact on the visual lands. Within the unit, vegetation treatment projects are found, with routes to access them and slash piles and stumps visible. BLM did not evaluate Solitude nor Primitive Unconfined Recreation .

It appears that in its findings, BLM drew the boundaries of the unit to include a considerable amount of private land and roads, especially in the east central part of the unit. If these were excised out, most of these man–made features would be eliminated, raising the overall naturalness of the unit. In addition, the area contains a diversity of vegetation types and age classes visually masking the majority of human impacts in the unit. This fact negates BLM's assessment that the unit is not primarily natural in appearance.

Commenter1:Karl Ford

Comment Excerpt Text:

Cooper Mountain Lands with Wilderness Characteristics Naturalness – BLM found that the unit has had imprints of man within the unit, but compared to the overall size, lack of public motorized use, and natural processes beginning to reclaim certain features – the unit is considered to have apparent naturalness. Solitude The unit contains a vast amount of land with high topographic relief. Thick vegetation provides excellent screening, especially in the drainages where riparian vegetation offers audible and visual screening.

Opportunities for solitude are guaranteed in the majority of the unit. Primitive Unconfined Recreation: The unit provides outstanding opportunities for primitive recreation due to the vast amount of land, undeveloped facilities, and non-motorized recreation possibilities. Challenging overland travel and multiple trails within the unit offers an optimal primitive recreation experience. Supplemental Values: This includes: historic homestead with cabins, scenic views of the Front Range, 3 potential Colorado Natural Heritage Program conservation areas: Felch

Creek (very high biodiversity significance), Blue Mtn. to Phantom Canyon (high biodiversity significance), and Phantom Canyon of Eight mile Creek (very high biodiversity significance). Additionally, the unit contains Mexican spotted owl critical habitat as well as mile deer winter range and elk sever winter range.

Supplemental Values: designating this area as a LWC would enhance protection for the two BLM designated Areas of Environmental Concern (ACESs) that are partially contained within this unit. Garden Park Fossil Area is renown nationally as a premier paleontological site and is the location of first discovery of several dinosaur species. Phantom Canyon is the second ACEC and is recognized for many of the historic sites along the former railroad in this rugged and scenic canyon.

The area also contains habitat for several species of particular interest. The swift fox is listed as a threatened species by Colorado Parks and Wildlife as well as Colorado BLM sensitive. The black-tailed prairie-dog is a species of concern for CPW, Colorado BLM sensitive, and a Comprehensive Wildlife Conservation Strategy (CWCS) Species of Most Concern. Preble's meadow jumping mouse is a CPW threatened species and a CWCS Species of Most Concern. The Brazilian free tailed bat is a Colorado state ranked critically imperiled species and the black-footed ferret is listed as an endangered species.

Commenter1:Karl Ford

Comment Excerpt Text:

Chucharas Canyon Lands with Wilderness Characteristics Naturalness – BLM found the Kenner Ranch homestead located at the end of Kenner Ranch Road has many recent human made features. Kenner Rach consists of historic buildings, fences, and a corral. Near the site, other man made features are present including stock tanks, developed springs, and multiple routes used to access tanks and fence lines. Additional man-made features affecting the unit's natural character include two cisterns recently filled with cement. The unit may eventually have wilderness characteristics if man-made features are removed and routes have possible decades to revert to natural appearance. The unit does not possess wilderness characteristics due to the present imprints of man.

Supplemental Values – The unit is within the Colorado Natural Heritage Program's Potential Conservation Area for having high levels of biodiversity. In 2003 a successful transplant of Bighorn sheep occurred in the unit. Further, views from the Cucharas Canyon rim are superb, which is a rarity in the plains; there are historic homestead buildings alongside a coral, and lastly there is evidence of inhabitation by indigenous peoples.

Supplemental Values: The unit possesses extraordinary biological values and is part of a greater species' connectivity corridor with the contiguous Pike San Isabel National Forest and BLM lands. The Conservation Science Partners recently concluded an extensive study on unprotected roadless BLM land in the West that possess important ecologically based indicators of high diversity, resilience to climate change, and landscape connectivity. They concluded that the Badger Creek, Jack Hall Mountain unit contains rare and unique conservation values that are rarely found in this region. The area contains high biodiversity and has been labeled as a Potential Conservation Area by the Colorado Natural Heritage Program. This unit also support high habitat and range values for many wildlife species including the Canadian Lynx, mountain lion, black bear, Rocky Mountain bighorn sheep, mile deer, pronghorn, elk, Aberts squirrel, Brazilian free tailed bat, and Gunnison's prairie dog. Additionally, trout populations exist in Badger Creek.

Commenter1:Karl Ford

Comment Excerpt Text:

Beaver Creek Lands with Wilderness Characteristics

Naturalness – BLM found existing human impacts found within the unit have a relatively small impact on the overall naturalness of the area. Although range activity was found within the unit, it was found to be insignificant. A 2002 wilderness inventory conducted in the Turkey Creek area concluded the imprints of man - including an access road, historic mink ranch, and logging activity disqualified the area from wilderness consideration. However a 2013 inventory concluded the imprints of man such as cabins, mill site, and homesteads add supplemental value and that enough time has occurred allowing the unit to convert back to wilderness character. Solitude – Opportunities for solitude become outstanding due to the difficulty of motor vehicle access and/or challenging travel due to high topographic relief.

Numerous side drainages, thick timber, and rugged canyons contribute to opportunities to seek solitude. Sweeping vistas of the Front Range, Wet Mountains, and Great Plains allow for a feeling of vastness, thus ensuring the feeling of solitude.

Primitive Unconfined Recreation – Outstanding opportunities for primitive recreation are abound due to the unique topography, undeveloped facilities, and non-motorized recreation possibilities. For example, Badger Creek offers recreational activities such as hiking, hunting, and fishing. The area's streambeds are sandy or scoured bedrock making them pleasant to walk in and thus allowing visitors to see the many unique ecologic features. Supplemental Values – This area is located within the RGFO's Beaver Creek Area of Critical Environmental Concern (ACEC), is a Colorado National Heritage Program Potential Conservation Area for biodiversity interest, has historic homestead timbers and foundations, a historic pack trail/mail route, habitat for peregrine falcon nesting, Mexican spotted owl critical habitat, and provides habitat for elk severe winter ranged as mapped by Colorado Parks and Wildlife.

Naturalness: there is no motorized public access to any of the unit, with public access limited to traversing the backcountry via the contiguous Beaver Creek WSA. The BLM found no significant human impacts within this unit, and the few impacts being actively reclaimed by vegetation and largely unnoticeable. Further, many of the remaining impacts are now considered historical, adding supplemental value as noted by the BLM. Solitude: There are vast opportunities for solitude given the topographic variety, dense vegetation, few public entry points and lack of trails (motorized and non-motorized). The rugged hills, canyon, and cliffs provide screening from unnatural sights and sounds. Additionally, the many gulches and drainages provide outstanding opportunities for those seeking solitude.

Supplemental Values: The unit provides a vast corridor for species of the mountains and foothills as well as providing a critical linkage for the flora and fauna of the diverse western Great Plains to the east and the Upper Sonoran zone to the south. Habitat for significant bird species include, Mexican spotted owl, Peregrine Falcon, and bald eagle. BLM attributes supplemental value to the two waterfalls found within the Turkey Creek area as well as to the various historical structures, buildings, and sites that all enhance the area's wilderness characteristics.

Commenter1:Karl Ford

Comment Excerpt Text:

Chucharas Canyon Lands with Wilderness Characteristics

Naturalness: BLM found the Kenner Ranch homestead located at the end of Kenner Ranch Road has many recent human made features. Kenner Rach consists of historic buildings, fences, and a corral. Near the site, other man made features are present including stock tanks, developed springs, and multiple routes used to access tanks and fence lines. Additional man-made features affecting the unit's natural character include two cisterns recently filled with cement. The unit may eventually have wilderness characteristics if man-made features are removed and routes have possible decades to revert to natural appearance. The unit does not possess wilderness characteristics due to the present imprints of man.

Supplemental Values – The unit is within the Colorado Natural Heritage Program's Potential Conservation Area for having high levels of biodiversity. In 2003 a successful transplant of Bighorn sheep occurred in the unit. Further, views from the Cucharas Canyon rim are superb, which is a rarity in the plains; there are historic homestead buildings alongside a coral, and lastly there is evidence of inhabitation by indigenous peoples.

Naturalness: Can the homestead area be excised from the LWC area?

Supplemental Values: The Cucharas Canyon proposed LWC is the only federally managed roadless area in the eastern Colorado plains that meets the criteria of Lands with Wilderness Characteristics. Additionally, BLM recognizes Cucharas Canyon as an Area of Critical Environmental Concern (ACEC) primarily for its cultural resources that "reflect the importance of the area to Native Americans, settles, and ranchers." Nearly the entirety of this proposed LWC has high biodiversity significance as identified by the Colorado Natural Heritage Program (CNHP) and is encompassed within a greater 209,000 acre Potential Conservation Area. The area contains rare plant and animal species such as the state critically imperiled Elton's lip fern, Simius roadside skipper – vulnerable in Colorado, swift fox – globally vulnerable, and a fair occurrence of the black-tailed prairie dog. Additionally, the area is also noteworthy for its disparate geological features. The majority of Cucharas Canyon is from the Jurassic Period, with the northern part showing evidence of older rocks dating back to the Permian-Pennsylvanian Age.

Commenter1:Karl Ford

Comment Excerpt Text:

The area [Booger Red Hill] also has Supplemental Values, especially ecological values. The area's 5 Potential Conservation Area's (PCA) are significant for their levels of biodiversity containing globally vulnerable species such as the thinleaf alder, Fendler cloak-fern, and Parry's oatgrass. Additionally Gunnison prairie dogs, Rocky Mountain bighorn sheep, black bear, elk, mule deer, white-tailed deer, mountain lion, and Abert's squirrel.

Commenter1:Karl Ford

Comment Excerpt Text:

Thompson, Gribble, Twin Mountains Lands with Wilderness Characteristics

Naturalness: BLM found the accumulative impacts from man-made features affect the overall naturalness of the area. These include numerous off-highway vehicle routes along Fremont County Road 307 A and Cottonwood Creek, vegetation treatment projects located in the northwestern portion of the unit, and a transmission line located along a ridge denoting the unit's

southern boundary. Solitude and Primitive Unconfined Recreation were not evaluated, but Supplemental Values indicate the unit is located within elk winter range and mule deer severe winter range as designated by Colorado Parks and Wildlife.

The map of the unit does not show developed areas and the few human impacts to naturalness in the area are minimal and consistent with BLM's standards for naturalness. They are spaced out over 19,200 acres, and go largely unnoticed when traveling the landscape due to topographic and vegetative screening provided by lands within the rest of the proposed LWC. Proactive measures by the BLM to close motorized routes have led to revegetation efforts along routes such as the Wilson Creek Trail and the Thompson Mountain loop trail. Continued efforts will increase the area's overall naturalness.

Solitude scores high in this unit as the area's heavy vegetation and topology screen visitors from unnatural sights and sounds. The topographic variety, few entry points, interior trails, and size of the unit afford visitors an opportunity to experience solitude and remoteness. Primitive Unconfined Recreation opportunities are outstanding for quiet-use recreation such as: hiking, backpacking, camping, hunting, rock climbing, wildlife viewing, photography, horseback riding. Specific camping opportunities exist such as the grasslands near South Twin Mountain, or alongside the Thompson Mountain loop trail, or campsites off the short cherrystems from County Road 69.

Supplemental Values include: the area is home to black bear, elk, mule deer, pronghorn, mountain lion, Aberts squirrel, Brazil free tailed bat, and the Gunnison's prairie-dog – a species of most concern as identified by US Fish and Wildlife. Please describe any sings of these species including tracks, scat, sounds, or sightings. In addition, bird species in the unit include bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and great blue heron. Finally, scenic views of nearby and distant mountain ranges are abundant in the area. For example, the Wilson Creek trail affords unique views of Pikes Peak and other mountains toward the northeast. The Thompson Mountain loop offers additional views of Eightmile Mountain and the Sangre de Cristo Mountains. Finally, views from Twin Mountains portray the Arkansas River valley to the south with views of the Wet Mountains the Sangre de Cristo Mountains.

Commenter1:Karl Ford

Comment Excerpt Text:

Table Mountain/Echo Canyon Lands with Wilderness Characteristics Naturalness – BLM found the accumulative impacts of vegetation treatment projects significantly impact the naturalness of the unit. Additionally, the impacts of mining are also visible throughout the area and have a visual impact on the landscape. Overall, the inventory concluded the unit does not possess wilderness characteristics due to excessive imprints of man. Supplemental Values – The Colorado Natural Heritage Program (CNHP) has identified 675 acres to be managed as a Research Natural Area similar to a Wilderness Study Area and has identified the west portion of the unit to contain a high to very high rate of biodiversity. There are historic cabins and a homestead located within the unit, alongside habitat for bighorn sheep, elk winter range, and bighorn sheep production area.

Naturalness: Motorized access is limited to boundary roads, and a couple short cherrystems along the unit's western portion. It's also apparent that other routes show a lack of motorized and overall regular use, with the forces of nature reclaiming many of the former routes. Although there are human impacts in the area, they are not visible unless in the immediate vicinity and the majority

are minor and consistent with BLM Manual 6310 thus not affecting the natural integrity of the unit. Additionally, the land and routes have had over 20 years of rewilding with little to no use.

Solitude: The few entry points, lack of trails (motorized and non-motorized_ and observed lack of overall use provide ample opportunity for solitude. For example, East Gulch is a great place to find seclusion and can be accessed easily from cherrystem road BLM 6060. Primitive Unconfined Recreation: The unit's near 31,600 acres of contiguous unroaded lands provide for a variety of primitive and unconfined recreational opportunities such as hiking, backpacking, camping, rock climbing, hunting, wildlife viewing, bird watching, horseback riding, and photography. For example, the top of the Table Mountain plateau provide excellent opportunities for sightseeing and photography.

Supplemental Values: The unit is part of a greater connectivity corridor aligning with BLM's Arkansas Canyonlands Area of Environmental Concern – recognized for outstanding recreation, scenic views, critical and valued species, and the High Mesa Grassland Research Natural Area. The Colorado National Heritage Program recognizes two very high biodiversity areas in the unit as Potential Conservation Areas. The presence of many globally imperiled and vulnerable plant species including the Arkansas Canyon Sticklead, Degener beardtongue, Fendler cloak-fern, and jeweled blazingstar.

Commenter1:Karl Ford

Comment Excerpt Text:

Stanley Creek, Green Mountain Lands with Wilderness Characteristics

BLM found the man-made features include a two-track motorized route that is no longer open to the public. This route is currently open for administrative use only and due to a lack of use, the route is fading, yet still noticeable. Range use in prevalent within the unit, including spring developments, corals, stock tanks, and fence lines. Although range use is visible it does not affect the overall naturalness of the area. Other man-made features include old cabins and a homestead site. The cabins are historic, add supplemental value to the unit and therefore do not affect the unit's naturalness. Solitude and Primitive Unconfined Recreation were not evaluated. Supplemental Values – This unit contains a historic homestead site along the Stanley Creek drainage. The unit also contains elk summer range, production area, and severe winter range alongside mule deer winter range. Additionally, the unit is located within the Sangres Lynx Analysis Unit and contains primary and secondary lynx habitat.

The unit shows no inholdings. BLM's own findings show the area is primarily affected by the forces of nature with human impacts being minor and/or occurring a considerably long time ago. It's important to note that the few minor human impacts spread throughout the area do not hinder the area's overall naturalness and how public access is limited to two defined access points, neither of which permits motorized use. Lastly, many of the other trails and former motorized routes show an apparent lack of regular use and thus have been reclaimed by the forces of nature. The diversity of ecosystems and vegetation types found throughout the area. For example, the many gulches and creeks offer habitat for rich riparian life, and the groves of high-elevation mixed forests and montane grasslands provide for an assortment of flora and fauna.

Solitude: the area's heavy vegetation and topology screen visitors from unnatural sights and sounds. Highlight how the topographic variety, few entry points, interior trails, and size of the

unit afford visitors an opportunity to experience solitude and remoteness. Try to identify specifics such as not seeing any signs of human development.

Primitive Unconfined Recreation: the lack of visitation and outstanding opportunities for respite and remoteness while hiking, biking, backpacking, camping, hunting, fishing, wildlife viewing, bird watching, horseback riding, snowshoeing, and photography. Supplemental Values: the proposed LWC is contiguous with the greater Sangre de Cristo Wilderness and San Isabel National Forest, a vast corridor of species' connectivity. The Stanley Creek, Green Mountain proposed LWC unit extends this connectivity core 5,500 acres north to lower elevation foothills which is critical habitat for many species and provides connectivity to the Huerfano State Wildlife area and Manzanares Creek State Trust Land block.

Commenter1:Karl Ford

Comment Excerpt Text:

South Badger Creek Lands with Wilderness Characteristics

BLM found this unit to meet all of its criteria. Solitude – Outstanding opportunities for solitude exist throughout the unit. Topographic relief and thick vegetation allows for separation from man-made disturbances. A portion of the unit where the majority of use occurs is along Badger Creek. Although many public land visitors frequent Badger Creek, the abundant riparian vegetation along the creek provides excellent visual and audible screening, allowing for solitude to exist. Primitive Unconfined Recreation – The unit provides outstanding opportunities for primitive recreation due to the unique topography, undeveloped facilities, and non-motorized recreation possibilities. The unit provides excellent recreation possibilities, such as hiking, fishing, sightseeing, hunting, wildlife viewing, and photography. Excellent sightseeing opportunities are available in the higher elevations with vistas of the Arkansas River Canyon, Sangre de Christo Mountains, and the Collegiate Peak Mountain. Supplemental Values include:Wildlife: The unit contains mule deer and elk severe winter range as mapped by Colorado Parks and Wildlife. Ecological: The east central part of the unit has been identified by the Colorado Natural Heritage Program as a potential conservation area (PCA). The unnamed tributary to Badger Creek at Howard site has a very high biodiversity significance ranking. BLMs report highlights the significance of the natural riparian community such as the presence of the globally imperiled pale blue-eyed grass.

Geological: Sand stone hogbacks are found in the northeastern portion of the unit. Historical: An historic wagon trail follows Badger Creek and Little Badger Creek along with archeological sites as cited by the BLM.

Primitive Unconfined Recreation – Badger Creek is one of the few primarily spring-fed streams in this part of the state, providing excellent opportunities for backcountry trout fishing! Supplemental Values: In addition to mule deer and elk severe winter range, the unit contains habitat and range values for a multitude of wildlife species, including the Rocky Mountain bighorn sheep, black bear, elk, mule deer, pronghorn, mountain lion, and the Brazilian free-tailed bat. Springfed streams on accessible public lands are regionally rare as more often than not they are located on private lands.

Commenter1:Karl Ford

Comment Excerpt Text:

Reinecker Ridge Lands with Wilderness Characteristics

BLM found this unit not to be of sufficient size; the unit is smaller than 5,000 acres and is bounded on the north by wilderness inventory road Park County Bar D. The remaining edges are defined by property lines other then BLM management. However, while the unit is smaller than 5,000 acres, it still qualifies as lands with wilderness characteristics due to the area being contiguous with the 17,429 acre James Mark Jones State Wildlife Area. The State Wildlife Area is managed to retain in natural values, backcountry recreation experiences and wildlife habitat. Additionally it resides along the unit's eastern border and actually contains the majority of Reinecker Ridge itself.

Regarding Naturalness, the area is primarily affected by the forces of nature, with human impacts mostly unnoticeable within the unit. The few minor human impacts found within the unit do not affect the natural integrity or the apparent naturalness of the overall unit. Solitude: the how the few entry points, plethora of trails, and observed lack of overall use provide ample opportunities for solitude. Primitive Unconfined Recreation: the unit provides outstanding opportunities for hiking, biking, backpacking, camping, hunting, snowshoeing, wildlife viewing, bird watching, horseback riding, and photography.

Supplemental Values: The area is part of a greater ecological connectivity core and has been found to contain significant to very high levels of biodiversity by the Colorado Natural Heritage Program (CNHP).

Additionally, it is within CNHP's biodiversity assessment of a greater South Park mega site containing globally rare, unique rich fen wetlands as well as globally and state rare plants. The area contains plants that have adapted to the rich fens, including the globally vulnerable Colorado Tansy-aster, rare plant communities including the globally imperiled wetland community Festuca arizonica- Muhlenbergia filiculmis, the world's largest grassland occurrence at 1.3 million acres, and the globally vulnerable Mountain Plover and its breeding ground. The Mountain Plover, a bird found to have high occurrence in the area, is listed as Colorado Department of Wildlife species of concern, a species of most concern by the US Wildlife Conservation and Restoration Program's Comprehensive Wildlife Conservation Strategy, Colorado BLM sensitive, and a Partnership in Flight Priority Bird.

Commenter1:Karl Ford

Comment Excerpt Text:

Grand Canyon Hills Lands with Wilderness Characteristics

Naturalness: BLM found that most of the land on the east side of the unit, near Ecology Park shows substantial evidence of human modification. There are many constructed and maintained motorized routes in this part of the unit. Also, the Deweese water gap diversion dam located in route "J" in Grape Creek Canyon is a visual impact on the landscape impacting the average observer's experience. Other human activities include remnants from a historic railroad circa 1800's. Additionally, although miningdisturbance is isolated it's still noticeable on parts of the unit. Solitude – High topographic relief, rugged terrain, thick vegetation, and vast expanses of lands allows remote portions within the unit to have outstanding opportunities for solitude. Further, portions along Grape Creek, a popular hiking and fishing location, are difficult to access thus creating outstanding opportunities for solitude. Primitive Unconfined Recreation – There are no developed facilities within the unit, and all camping is primitive. Excellent recreational opportunities include: hiking, backpacking, fishing, rafting, sightseeing, hunting, and wildlife viewing - Recreational opportunities becoming outstanding due to the challenging topography and vast opportunities.

Supplemental Values – The Grape Creek riparian area is designated as an Area of Critical Environmental Concern by the RGFO's 1995 RMP. The Water Gap site is a Colorado Natural Heritage Program potential conservation area due to a very high significance of biodiversity. The Royal Gorge, Grand Canyon Hills site is another CNHP site also have a very high rate of biodiversity. There are remnants from a historic railroad through Grape Creek as well as a historic water line through the Royal Gorge. Lastly, the unit contains bighorn sheep and mule deer sever winter range as mapped by CPW.

Naturalness: Many routes show a lack of motorized use and an overall apparent lack of regular use. The LWC offers many vegetation types due to topographic variety and diverse ecosystems. Further, Grape Creek is a perennial stream, relatively rare for this area, offering rich riparian life. Although BLM cited minor impacts from thinning in 2003, they also stated that this impact is largely unnoticeable and does not affect the overall natural character. BLM also cites other impacts such as railroad remnants and a historic water line but acknowledges these as adding supplemental value to the unit. Solitude: Topographic variety combined with few entry points and interior trials provide great opportunities for those seeking solitude. Emphasize the great opportunities for primitive camping at several dispersed campsites throughout the unit's interior. Primitive Unconfined Recreation: outstanding opportunities for quiet-use recreation such as: hiking, backpacking, camping, hunting, wildlife viewing, photography, horseback riding.

Supplemental Values: many critical and valued bird species (great blue heron, osprey, Mexican spotted owl, bald eagle, and American Falcon) have been identified in the area alongside high habitat and range values for many wildlife species such as bighorn sheep, black bear, mile deer, white tailed deer, pronghorn, mountain lion, Brazilian free tailed bat, and Gunnison's prairie-dog.

Commenter1:Karl Ford

Comment Excerpt Text:

Crampton Mountain Lands with Wilderness Characteristics

Naturalness – BLM found the impact of man-made features within the unit affect the natural character of the unit. The mad-made features include numerous routes that receive off-highway vehicle use. The majority of use occurs along Fremont County Road 307 A and Cottonwood Creek. The routes appear to have been originally constructed by mechanical means. The constructed nature of the routes is a visual impact on the landscape. Solitude and Primitive Unconfined Recreation were not evaluated. Supplemental Values: this unit is located within elk winter range and mule deer severe winter range as designated by Colorado Parks and Wildlife.

Naturalness: Many of the human impacts referenced by the BLM are not actually in the unit. All defined roads in the area (Fremont County Road 307A, Fremont County Road 21, transmission access route, BLM TMP roads) are quite short and removed from the proposed LWC via cherrystems. Although the transmission line access route has been excluded it would be erroneous to assume that this hinders the natural integrity and apparent naturalness. After all this is located outside the proposed unit. OHV routes are minimal and barely noticeable. Further, these routes were not created, and are not maintained by mechanical means, nor do they appear regular or continuous. These routes are not in the Arkansas River TMP and have no designation on the ground. These routes should be closed with proper signage.

Solitude: The area's heavy vegetation and topology screen visitors from unnatural sights and sounds. Highlight how the topographic variety, few entry points, interior trails, and size of the

unit afford visitors an opportunity to experience solitude and remoteness. Primitive Unconfined Recreation: outstanding opportunities for quiet-use recreation exist in the unit for: hiking, backpacking, camping, hunting, rock climbing, wildlife viewing, photography, horseback riding.

Supplemental Values: The area is home to black bear, elk, mule deer, pronghorn, mountain lion, Alberts squirrel, Brazil free tailed bat, and the Gunnison's prairie-dog – a species of most concern as identified by US Fish and Wildlife. Please describe any sings of these species including tracks, scat, sounds, or sightings. Valued bird species in the unit include bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and great blue heron. Scenic views are abundant throughout. There are exceptional views of the surrounding mountains from many of the highpoints within the unit including Eightmile Mountain, Twin Mountains, Copper Mountain and beyond.

Commenter1:Sophia Guerrero

Comment Excerpt Text:

Lastly, Badger Creek is one of very few spring fed creeks on public land in this area. Most of these backcountry springs are on private land. This public spring-fed creek allows for backcountry trout fishing to be enjoyed by all. Due to these reasons I would like to see this area preserved as an LWC with not motorized recreation allowed.

Commenter1:Sophia Guerrero

Comment Excerpt Text:

the lush riparian areas [in Bader Creek South Unit] provide a sense of seclusion that is getting more and more difficult to find. While there are many visitors who enjoy this land, it is easy to find places to enjoy the land on its own, with a deep and rugged sense of wild that remains separate from manmade disturbances.

Commenter1:Sophia Guerrero

Comment Excerpt Text:

the topography of the area [Badger Creek South Unit] make it an ideal location for primitive recreation like hiking, photography, fishing, sightseeing, hunting and wildlife viewing. These activities are enjoyed in the upmost, and in the true Colorado spirit not only because of the topography, but also because of the underdeveloped facilities, and lack of motorized vehicles that could create a disturbance. Also, the views are incredible, with vistas of the Arkansas River Canyon, Sangre de Christo Mountains, and the Collegiate Peak Mountains

Commenter1:Ellen Johnson-Fay

Comment Excerpt Text:

I was impressed by the natural beauty of the area [Upper Red Canyon] and the sense that we were in a place that rarely saw the footsteps of other people. The trail was difficult to discern but our guides knew where they were going and they took us to remarkable vistas of rock formations, valleys and green meadows. Because of the recent rains the wildflowers were magnificent, I would have thought I was hiking in an alpine meadow. The ecological diversity seems to have covered any human·made structures that might have been there - none were visible to us. It

seems a wonderful area for hiking and backpacking and an important area to preserve from any potentially harmful human intrusions by being designated as a wilderness area.

Commenter1:Rachel Hicks

Comment Excerpt Text:

There are vast opportunities for solitude given the topographic variety and vegetative cover, the few public entry points, and dearth of trails (motorized and nonmotorized). Cucharas Canyon, easily accessible via two nonmotorized trails, and the side canyons that descend into it provide excellent opportunity for respite and seclusion. For example, the wooded grasslands in the eastern section of the unit provide outstanding opportunities for solitude and the rim of Cucharas Canyon provides excellent opportunities for photography and scenic viewing an opportunity somewhat rare on the eastern plains. Overall, there are outstanding opportunities for hiking, backpacking, camping, rock climbing, hunting, wildlife viewing, bird watching, horseback riding, and photography.

Commenter1:Rachel Hicks

Comment Excerpt Text:

Note that while there are a few minor human impacts spread throughout the proposed [Cucharas Canyon] LWC, note how they are examples of “humanmade features” that are considered substantially unnoticeable and thus do not hinder wilderness characteristics as outlined in BLM Manual 6310, p 6.

Commenter1:Micha Rosenoer

Comment Excerpt Text:

Crampton [Mountain] is home to many species, including the black bear, elk, mule, deer, pronghorn, mountain lion, Albert's squrrel, Brazil tailed bat, and Gunnison's prariedog, bald eagle, spotted owl, scale quail, wild turkey, woodpecker, geese, and great blue heron. Please do your best to preserve and protect habitat for these animals, and plant species, as well.

Commenter1:Frank Swain

Comment Excerpt Text:

I encourage your office to reasses its findings that the Stanley Creek unit does not meet the minimum criteria for wilderness. This area presents vast opportunities to find solitude and remoteness while being in close proximity to the Front Range urban corridor. I respectfully disagree with your findings that the area lacks sufficient naturalness as I’ve found the area to be primarily dominated by the forces of nature, with the few noticeable human impacts adding supplemental value.

I’ve also found the area to be an ideal place for primitive forms of recreation. The absence of motorized use and lack of overall visitation presents vast opportunities testing one’s navigation skills alongside several great primitive camping locations. Additionally, the area’s close proximity to the Huerfano State WIldlife Area and Manzanares Creek State Trust land provide fantastic opportunities for wildlife viewing and birding as well as an important unfragmented wildlife corridor.

Commenter1:Randy Mack

Comment Excerpt Text:

As I'm sure you're aware, the area [Cucharas Canyon] consists of over 6,000 acres of contiguous unroaded wild lands, offering a variety of primitive and unconfined recreational opportunities. There are outstanding opportunities for hiking, backpacking, camping, rock climbing, hunting, wildlife viewing, bird watching, horseback riding, and photography. Cucharas Canyon provides an outstanding area for hiking with an eight mile nonmotorized trail through the canyon. Please manage this area so that the forces of nature can reclaim impacts from society and close it to motorized recreation as well as oil and gas development.

Organization1:Pew Charitable Trusts

Commenter1:Ken Rait

Comment Excerpt Text:

On May 6th, 2015, these citizen inventory reports—consisting of a 700-page document for 24 areas, including maps, over 3,300 geotagged photos with narrative descriptions, and narrative reports for each area—were submitted to BLM in person. This citizen group assessment adheres to the inventory guidelines established under FLPMA and meets the minimum standard for wilderness characteristics inventory as defined by BLM manual 6310, Conducting Wilderness Characteristics Inventory on BLM Lands. This citizen inventory constitutes new information and obligates the agency to assess the citizen findings and, as appropriate, revise the agency's existing LWC inventory (see 6310.06.A.3).

Recommendation: The citizen LWC inventory for the Eastern Colorado field office meets the minimum standard defined by BLM Manual 6310; therefore the BLM must assess and respond to this information prior to the development of the Draft RMP, including the incorporation of changes, as appropriate, to the agency's LWC inventory.

Commenter1:Andrew Tuke

Comment Excerpt Text:

I encourage you to reconsider your office's wilderness inventory findings for the Crampton Mountain/ Cottonwood Creek area. Your inventory suggests the area does not meet the minimum criteria for wilderness due to a lack of naturalness from historical motorized or offhighway vehicle use. Your inventory claims routes associated with this use are a visual impact on the landscape, but I disagree and ask your office to reinventory the area for wilderness characteristics. In my opinion, all of the defined routes in the area (County Road 307 A, County Road 21, the transmission access route, and BLM roads) are quite short and do not create a visual impact on the area. The area's vegetation and topology masks any sights and sounds associated with the aforementioned routes especially as one travels north and west through the unit. To support these claims, I encourage the BLM to utilize the citizen report developed by Wild Connections as a resource when reconsidering your wilderness inventory.

Commenter1:Andrew Tuke

Comment Excerpt Text:

I'd also like to express a concern for the area's wildlife if this area is not managed as wilderness. If the area [Crampton Mountain /Cottonwood Creek] becomes open to oil and gas drilling, mining, logging or expanded motorized recreation I'm concerned this will result in habitat fragmentation. As I'm sure you know, the area is home to black bear, elk, mule deer, pronghorn, mountain lion, and many other species. One species in particular I'm concerned for is the Gunnison's prairiedog which is a species of most concern as identified by the US Fish and Wildlife. If this area is not managed for its natural values, I'm concerned this and other species including the Mexican spotted owl and bald eagle may lose important habitat and potentially loss of life due to poor management approaches.

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

The Colorado Natural Heritage Program has already identified a portion of this area [Thompson Mountain] to be managed as a Research Natural Area similar to a Wilderness Study Area due to high levels of biodiversity that are contained within this area. This includes the presence of many globally imperiled and vulnerable plant species including the Arkansas Canyon Sticklead, Degener beardtongue, Fendler cloakfern, and jeweled blazingstar. Additionally, the area contains habitat for bighorn sheep, elk winter range, and mountain goat (which I saw on a recent hike slightly south of Texas Creek).

Commenter1:Alison Gallensky

Comment Excerpt Text:

In addition, the BLM Resource Management Plan should define management for areas identified as Lands with Wilderness Characteristics that focuses on maintaining the wilderness characteristics of those lands.

Commenter1:Alison Gallensky

Comment Excerpt Text:

I believe it is especially important to protect the Lands with Wilderness Characteristics along the Arkansas Canyon, from Browns Canyon to the Royal Gorge including the large Table Mountain, Echo Canyon area north of McIntyre Hills. This area is important for species ranging from bighorn sheep to the Arkansas Canyon stickleaf plant (Nuttallia densa) that is only found in the Arkansas Canyon (see Recommended Best Management Practices for Arkansas Canyon stickleaf (Nuttallia densa) prepared by the Colorado Natural Heritage Program in 2014,

Commenter1:Anne Akers-Lewis

Comment Excerpt Text:

I feel that it is very important to protect lands with wilderness characteristics (LWCs). Wild Connections works to connect wildlife habitat and corridors between them. They have conducted extensive inventories of lands that meet Bureau of Land Management (BLM) LWC criteria, and I urge you to protect them as such.

Commenter1:John Sztukowski

Comment Excerpt Text:

Table Mountain, Echo Canyon is located north of the Arkansas River, between Texas Creek, CO and Parkdale, CO. It provides excellent backcountry experiences – some of which I've enjoyed there myself in recent years – including hiking, wildlife viewing, scenic viewing, and photography. This incredible landscape – Table Mountain juxtaposed over Echo Canyon – provide breathtaking views within the unit. And Table Mountain itself provides extraordinary views of the nearby Sangre de Cristo Mountains and Arkansas River Canyonlands. This area also provides outstanding opportunity for solitude given its rugged nature and difficulty of public access.

Why is the area important from your perspective? (You may wish to speak to opportunities for Solitude, Primitive and Unconfined Recreation and the area's Supplemental Values – Ecological, Wildlife, Historical, Geological, etc.)

This area is important for a multitude of reasons. It represents BLM's largest contiguous natural area in the RGFO region, providing a crucial wildlife corridor for a number of species, including Rocky Mountain bighorn sheep, elk, pronghorn mule deer, black bear, mountain lion, Brazilian free tailed bat and Gunnison' prairie dog, a Colorado BLM sensitive species. Furthermore this area provides habitat and range for many valued bird species, including the bald eagle, American peregrine falcon, Mexican spotted owl, scaled quail, wild turkey, and great blue heron. Table Mountain, Echo Canyon also has extraordinary ecological values. Given its vast size and diversity, it encompasses many ecosystems, from a pinyon-juniper woodland and oak scrubland, to riparian drainages and natural springs, to montane grasslands and mixed forests of ponderosa pine, Colorado blue spruce, and Douglas fir. This area provides a refuge for many plants and plant communities, including vulnerable and imperiled species such as the Arkansas Canyon Stickleaf, Degener beardtongue, Fendler Cloak-fern, jeweled blazing star and narrowleaf cottonwood – river birch riparian woodland. A small Instant Study Area even resides atop part of Table Mountain, recognizing and preserving the diversity of native grasses. Conservation Science Partners also recognizes Table Mountain as a core conservation area, only one of six in the region, based on important ecological indicators, such as high biodiversity, resilience to climate change, and landscape connectivity. Table Mountain, Echo Canyon also has rich historical and cultural values. Echo Canyon has a mining and ranching history, with a historic homestead and corral found amidst the natural landscape. Furthermore, this area holds strong evidence of inhabitation by indigenous peoples, such as wiki-up sites and lithic scatter. These values can be damaged or lost forever if this area was developed for oil and gas leasing or motorized recreation.

Commenter1:John Sztukowski

Comment Excerpt Text:

I camp and hike in this area [Table Mtn, Echo Canyon] quite a bit. It provides incredible scenic views of the Sawatch Range, Buffalo Peaks, and Upper Ark River Valley. There are many opportunities for photography in this area, not only of the breathtaking views, but of the local wildlife and variety of wildflowers.

Why is the area important from your perspective? (You may wish to speak to opportunities for Solitude, Primitive and Unconfined Recreation and the area's Supplemental Values – Ecological, Wildlife, Historical, Geological, etc.)

This area is important not only for the above recreational and scenic values, but spans vital drainages and wildlife corridors extending from the adjacent USFS national forest. It has cultural

significance as well, given its Ute history as valuable hunting grounds and near the sources of Poncha hot springs, and proximity to the Poncha Pass to enter the San Luis Valley. This area is unique high elevation BLM land, with aspen groves and forested foothills, divided by creeks and drainages that flow from the above mountains to the South Arkansas River. On some areas (above and west of Pass Creek), there are social trails and redundant routes that parallel each other and have caused heavy erosion on the vulnerable rocky topsoil.

Commenter1:James Lockhart

Comment Excerpt Text:

The Table Mountain area was found not to have wilderness characteristics at present due to vegetation treatments and visible impacts of mining. I question whether the area has sufficient impacts from either to remove it from consideration as lands with wilderness characteristics. Although a number of jeep roads were constructed in the area, I believe more than 50 years ago, apparently for purposes of minerals exploration, it is my understanding that there has never been any actual mining, in the sense of profitable removal of minerals, in the area.

Commenter1:James Lockhart

Comment Excerpt Text:

The portion of Booger Red area north of Fourmile Creek is landlocked by private land along its boundaries and appears to receive little visitation. The trails which the BLM has designated in the central portion, in the vicinity of High Creek and Hole in the Rock Gulch, appear to receive relatively little use. In the case of a designated mountain bike trail on the north side of High Creek, the trail receives so little use as not to be discernible on the ground. The particularly rugged terrain, combined with the lack of human visitation, appears to make it eminently qualified as lands with wilderness characteristics.

Commenter1:James Lockhart

Comment Excerpt Text:

The Thirty-One Mile Mountain roadless area represents an example of an area which possesses significant wilderness characteristics, which should be considered in a resource management plan, even though other factors might make it unsuitable for wilderness designation. The area admittedly has a couple of routes, used by offroad recreationists and a grazing permittee, which extend into the heart of the area. It also has some structures associated with grazing adjacent to these routes. However, outside the immediate corridor of these routes, it is essentially wild. with few signs of human impact. These characteristics should be considered in any management decisions made for the area. I note that Waugh Mountain, another area with similar impacts affecting only a portion of its acreage, was found to have LWC status. It seems that these characteristics should be considered in both areas during the detailed planning phase, rather than having one area somewhat arbitrarily classified as an area where wilderness characteristics should be recognized in the BLM's planning process, while the other area's similar characteristics are ruled out at the preplanning stage.

Commenter1:James Lockhart

Comment Excerpt Text:

Grape Creek adjacent parcels I have visited the large parcel of BLM land centered upon Susies Ridge on the western side of the Grape Creek Wilderness Study Area. The area is connected to the existing WSA by a relatively narrow neck of federal land, and I believe that iwas primarily for that reason that the area was excluded from consideration as lands with wilderness characteristics. This ignores the fact that the State Trust Lands to the south of the connecting link are in the Stewardship Trust, causing them to be managed for purposes consistent with LWC purposes. There is no public access into the State parcel and the land is leased for grazing. See https://gis.co.gov/trustlands/ This tends to mitigate the narrowness of the connecting link, considering only BLM land. Just as contiguity with WSAs or Forest Service designated wilderness is a factor to consider in determining LWC status of relatively small BLM parcels, I believe that contiguity with state lands managed to preserve their unimpacted condition should be considered. I have visited the area on several occasions and found little evidence of human impact in portions of the area that I have visited. I therefore believe that the parcel possesses wilderness characteristics which should be protected.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

Stanley Creek contains a great expanse of beautiful, undisturbed, public land including wildflowers, quartz outcroppings, abundant wildlife, birds, butterflies, rushing creeks, historic decaying log cabins, and full views of mountains. I have hiked extensively in and around the Blanca Basin area. This is an area that meets the qualifications of Land with Wilderness Characteristics and should definitely be designated as wilderness.

Commenter1:Lee Patton

Comment Excerpt Text:

I serve on the board of Wild Connections and have been involved in the editing of many of our reports surveying up to 24 resource areas with wilderness characteristics. Please consider Wild Connections data for these areas in planning decisions for the region, especially as core areas to promote wildlife connectivity and protect biodiversity.

Commenter1:Kristin Skoog

Comment Excerpt Text:

LWCs should be monitored for encroachments from adjacent lands, both public and private.

Commenter1:Alan Robinson

Comment Excerpt Text:

Reviewing the BLM on line I agree with WC's respectful critique that the BLM approach has been overly narrow in its analysis of "naturalness" of candidate areas, and also failed to take advantage of modification of LWC boundaries to eliminate significant human impacts.

Commenter1:Alan Robinson

Comment Excerpt Text:

I remind BLM planners that the 1964 wilderness act (and probably FLPMA) went to considerable length to clarify that neither evidence of minor and long-abandoned human entries nor human activities outside an area should be automatic disqualifications; I urge you to adhere to that philosophy in your current LWC analysis. A second observation about this disparity is that I urge the BLM to consider as very significant the WC view (consistent with contemporary views of conservation biologists) of the importance of preserving and protecting connected wildlife habitat corridors. The expanded LWC pattern recommended by WC fulfils this objective far more effectively that the lesser LWC extent of the BLM's 2013 analysis.

Commenter1:Alan Robinson

Comment Excerpt Text:

As to a view that designating this LWC would be a de facto extension of the BCNM without public consultation, that seems incorrect because your RMP itself is a NEPA process with extensive opportunity for public comment. More importantly, as outlined in your own guidelines, evaluating and classifying LWCs is to be based on objective criteria and not on political judgements that an adjacent area is "already big enough" or somehow disqualifies adjacent areas from being similarly evaluated. If objective criteria for qualification as a LWC are met then I believe it is incumbent on the BLM RMP to follow through with this classification regardless of any lingering debate over the classification of adjacent public lands.

Organization1:Citizens for Huerfano Cty.

Commenter1:Patrick Campbell

Comment Excerpt Text:

Hi, as a member of CHC (Citizens for Huerfano County) I support the recommendatons of Wild Connections in regards to the Eastern Colorado Resource Management Plan. These folks have done a good job and I will not detract from it by attempting to summarize or paraphrase - especially since FYI this form is not accepting my typing very well.

B.1.15.3. Lands with Wilderness Characteristics - Impacts

Total Number of Comments: 8

Summary

The BLM's wilderness inventory of lands in the Cooper Mountain Unit is accurate because of the area's wildlife habitat, hunting opportunities, and lack of OHV traffic.

See Section 2.3.1.13, Lands with Wilderness Characteristics (p. 25)

Commenter1:Mallory Luebke

Comment Excerpt Text:

The ecological diversity of this region is what makes these areas of wilderness so valuable and makes Colorado so special. Not to mention, in terms of wildlife, the Badger Creek South Unit hosts one of the last few public areas where people can fish from springfed streams, making this an excellent area for fisherman seeking to catch the delicious brown trout. Any unnatural

disturbance to this area would be a huge loss for Colorado and our wilderness environment as areas of conservation.

Commenter1:Kevin Bradley

Comment Excerpt Text:

Area or trail name: Arkansas Valley watershed (Between Leadville and Pueblo Resevoir including all of the tributaries e.g. Beaver Creek, Newlin Creek, Phantom Canyon, Shelf Road, Oak Creek, etc.).

Describe the area and your historical use/knowledge of the area (time of year and hiking, camping, photography, etc): I live, work, and recreate (hike, picnic, camp, study, take pictures) in this area year around and have done so (several times a week) for the last 25 years. It is the joy in my life and it has felt the pressure of a growing population and increased use. One of the great challenges to these wild, natural, areas is good access (and signage) balanced against how to limit destruction caused by unlimited access by motorized vehicles (especially ATVs). Over the last several years there is also an issue of (non-hunting) firearms use.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Other species that will benefit from LWC and Wildlife Priority status for Booger Red Hills are owls and Wild Turkey that use upper Millsap Creek BLM lands for nesting and movement. Benefitting as well will be the CNHP site located near Carlton Tunnel and Grouse Mt.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Benefits of Wilderness-Quality Lands

BLM has identified "wilderness characteristics" to include naturalness or providing opportunities for solitude or primitive recreation. These values should also be identified and protected through this planning process. The planning area contains substantial lands with wilderness character, including citizen-proposed wilderness areas. Other lands in the planning area may also have wilderness characteristics that can be protected or enhanced in the RMP. BLM should recognize the wide range of values associated with lands with wilderness character: Economic benefits – The recreation opportunities provided by wilderness quality lands yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2005 State residents and non-residents spent $3 billion on wildlife recreation in Colorado.[43] In addition, local communities near protected public lands reap measurable benefits in terms of employment and personal income. A report by the Sonoran Institute found that protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. Rasker et al. 2004. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands. This report also found that rural western counties with a higher dependence on extractive industries showed lower income and employment growth. See also Rudzitis and Johansen (1989, 1991), Whitelaw and Niemi (1989) and Johnson and Rasker (1993, 1995), Lorah (2001) for additional research on the role of wildlands in the local economy.

These findings confirm earlier research, showing that wilderness and open space are in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. Morton 2000b. Other "non-market" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. Morton 1999. All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. Managing lands to protect wilderness qualities will also help protect cultural and archaeological sites.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic benefits – The recreation opportunities provided by wilderness quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2011 state residents and non-residents spent $3 billion on wildlife recreation in Colorado.[12] In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a report by the Sonoran Institute found that: "Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands." Sonoran Institute 2004, Prosperity in the 21st Century West - The Role of Protected Public Lands.

These findings confirm earlier research, showing that wilderness is in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. Morton 2000b. Other “non-market” economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. Morton 1999; Loomis 2000. All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Protection of wilderness characteristics will benefit many of the other multiple uses and values of BLM lands such as air and water quality, night skies, soundscapes, and viewsheds, while other more exclusionary uses (such as offroad vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The recreation opportunities provided by wilderness quality lands yield direct economic benefits to local communities. Communities near protected public lands reap measurable benefits in terms of employment and personal income. A report by the Sonoran Institute found that protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. Rasker et al. 2004. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands. This report also found that rural western counties with a higher dependence on extractive industries showed lower income and employment growth. See also Rudzitis and Johansen (1989, 1991), Whitelaw and Niemi (1989), Johnson and Rasker (1993, 1995), and Lorah (2001) for additional research on the role of wildlands in the local economy.

These findings confirm earlier research, showing that wilderness and open space are in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. Morton 2000b. Other "non-market" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. Morton 1999. All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands.

B.1.15.4. Lands with Wilderness Characteristics - Nominations

Total Number of Comments: 78

Summary

The BLM should consider Wild Connections data and recommendations for lands with wilderness characteristics. With increasing population pressures, it is important to manage BLM-administered lands at lower elevations for their wilderness characteristics. The BLM was correct in its finding of areas qualifying as lands with wilderness characteristics. The BLM should not have disqualified many areas as lands with wilderness characteristics. The BLM should find the following as lands with wilderness characteristics: Cooper Mountain, Beaver Creek East (with conservation easements on inholdings), Browns Canyon South, Booger Hill/Red Canyon, Beaver Creek East, Aiken Canyon, Chipeta Pahone Foothills, Table Mountain/Echo Canyon, Badger Creek South, Badger Creek/Jack Hall Mountain, Waugh Mountain, Bear Mountain/West Table Mountain, Gold Belt region, Bighorn Sheep Canyon, Thompson/Gribble/Twin Mountain, the Gulches, Stanley Creek, Ruby Mountain, Railroad Gulch, Badito Cone, Cucharas Canyon, Sangre de Cristo Foothills contiguous units, Reinecker Ridge, and Thirty-one Mile Mountain. The RMP should emphasize the importance of wildlife corridor connectivity and contiguity, which should be preserved and fostered. The RMP should consider areas connecting State Wildlife Areas to other natural areas for the combined effect (and area) that would be protected.

The BLM eliminated many units from consideration unnecessarily because of human impacts and vegetation treatments that had been overstated. The solitude, naturalness, and supplemental values of the areas that did not meet the BLM criteria should have outranked these impacts. Lands

with wilderness characteristics boundaries should be modified so that areas negatively affected by human activity are excluded and lands can be managed as lands with wilderness characteristics. They should be closed to motorized use, new roads, oil and gas leasing, energy resource development, mining, livestock grazing, commercial timber harvest, and military training.

See Section 2.3.1.13, Lands with Wilderness Characteristics (p. 25)

Commenter1:RuthCarol Cushman

Comment Excerpt Text:

My husband and I spend a lot of time hiking and camping in the South Park area, especially in the Tarryalls and on Georgia Pass and other mountains surrounding South Park. We cherish the beauty and relative solitude of this area and urge you to preserve the wilderness values that make us return again and again.

Commenter1:Jan Zinkl

Comment Excerpt Text:

I would like you to designate the Sangre de Cristo Foothills and Browns Canyon South as Lands with Wilderness Characteristics

Commenter1:Bob Wagstaff

Comment Excerpt Text:

I hiked Booger Red and Deer Haven BLM lands the last week in June of this year on separate days. I found these areas to be unexectedly beautiful areas with spectacular views, vast numbers and varieties of wild flowers, and peaceful solitude.

I hope that these features can be preserved against development especially motorized development.

Commenter1:Eliza Carter

Comment Excerpt Text:

I encourage the BLM's Royal Gorge Field Office to manage the Table Mountain/Echo Canyon Unit as a Land with Wilderness Characteristics. It is the largest contiguous roadless area in the Royal Gorge Field Office's region at 31,600 acres, has a lack of significant human impacts, disparate topology, diverse ecosystems, and abundant wildlife.

I think it should be recognized that the area contains excellent opportunities for solitude and quiet recreation such as hiking, backpacking, rock climbing, horseback riding, and others.

Most importantly, the area is part of a greater connectivity corridor aligning with BLM's Arkansas Canyonlands Area of Environmental Concern for its outstanding recreation opportunities, scenic vistas, critical and valued species, and unique lands contained within the High Mesa Grassland Research Natural Area.

Commenter1:Kristin Green

Comment Excerpt Text:

specifically in regards to the Cooper Mountain Unit. I feel this area strongly exemplifies wilderness qualities and meets the necessary criteria, partially given the limited use of motorized recreation in the area.

As BLM findings already noted, there is a guaranteed opportunity for solitude in the Cooper Mountain Unit. There is topographic relief, and thick vegetation that provides ample, sufficient audible and visual screening from human development. Plus challenging overland travel and multiple trails within the unit offer optimal primitive recreation experience for hikers, backpackers, wildlife viewers, photographers, and anyone else seeking a natural experience.

An LWC designation would also mesh well with two existing BLM efforts regarding Areas of Environmental Concern, Garden Park Fossil Area is renown nationally as a premier paleontological site and is the location of the first discovery of several dinosaur species. Phantom Canyon is recognized for many of the historic sites along the former railroad in this rugged and scenic canyon.

Commenter1:Nicole Shook

Comment Excerpt Text:

I am writing to urge BLM to protect the Thompson/Gribble area in the upcoming creation of your new management plan. I love this area of Colorado and hope that the Bureau does not open it up to development so that I can continue to enjoy the more than 19,000 acres of beautiful land.

Currently, human impacts in the area are very minimal. I'm not sure if the folks reading this message have ever visited but it is incredibly beautiful! It is a place I have gone since I was a child. More than any other surrounding area I've visited, Gribble provides solitude due to its vast expanses of seemingly untouched trails.

Commenter1:Audrey Wheeler

Comment Excerpt Text:

I encourage BLM to reference the Wild Connections citizen inventory report of proposed Lands with Wilderness Characteristics. In this report, Wild Connections rightfully excludes many of the unnatural impacts referenced by the BLM in their wilderness characteristics report. By removing Fremont County Road 307A, Fremont County Road 21, tranmssion access route, and BLM TMP roads this land should now be considered as lands with wilderness characteristics.

Commenter1:Audrey Wheeler

Comment Excerpt Text:

I feel strongly that Crampton Mountain is a unique area and should be preserved for its recreation opportunities and wildlife habitat. The area has dense vegetation and topography that make it feel isolated and wild to visitors. It is a great place to hear silence and feel remoteness, which are becoming more and more rare in our society. There are not many entry points and the trails are within areas that protect them from unnatural sights and sounds. Crampton is a great place for the activities that I, and many Coloradans, love activities that fuel a booming outdoor recreation industry for the state. At Crampton Mountain, you can hike, camp, backpack, climb, hunt, ride horses, and watch birds and wildlife. I hope this does not change as the BLM considers its plans.

Commenter1:Kelsey Ashton

Comment Excerpt Text:

I am writing to encourage the BLM to manage the Upper Red Canyon Unit as a Land with Wilderness Characteristics.

Commenter1:Renee Larrarte

Comment Excerpt Text:

LWC Unit Name: Table Mountain/ Echo Canyon

I encourage the BLM to manage the Table Mountain/ Echo Canyon responsibly. It is the largest contiguous roadless area in the Royal Gorge Field Office's region at 31,600 acres, has a lack of significant human impacts, disparate topology, diverse ecosystems, and abundant wildlife. The area offers outstanding opportunities for solitude and primitive and unconfined recreation such as hiking, backpacking, rock climbing, horseback riding among many others.he area is part of a greater connectivity corridor aligning with BLMs Arkansas Canyon lands Area of Environmental Concern for its outstanding recreation opportunities, scenic vies, critical and valued species, and unique lands contained with int the High Mesa Grassland Research Natural Area.

Commenter1:Sasha Nelson

Comment Excerpt Text:

I encourage the BLM's Royal Gorge Field Office to manage the Reinecker Ridge Unit as a Land with Wilderness Characteristics. As a hunter and angler it is increasingly important to protect and manage areas of connected habitat for benefit of wildlife and for quite users like me. While I believe all LWCs are important one in particular standsout for it's importance for wildlife

Commenter1:Brien Webster

Comment Excerpt Text:

I encourage the BLM's Royal Gorge Field Office to manage the Badger Creek South Unit as a Land with Wilderness Characteristics. Badger Creek is one of the few primarily spring fed streams in the region. As an avid angler and sportsman I cannot stress enough the importance of protecting and preserving a unit as unique as this. Anglers in this state rarely have the opportunity to fish spring fed streams on public lands.

Commenter1:Brien Webster

Comment Excerpt Text:

The bottom line is that the Badger Creek South Unit contains numerous wilderness characteristics that provide a means to experience and understand our cultural heritage in its purest form. These characteristics are worth preserving and that is why I am encouraging the BLM to manage this unit as an LWC with not motorized recreation allowed and to designate this area as closed to all oil and gas development and mineral extraction

Commenter1:Sophia Guerrero

Comment Excerpt Text:

The BLM's Royal Gorge Field Office should manage the Badger Creek South Unit as a Land with Wilderness Characteristics. This area has unique characteristics that should be protected for many reasons.

Commenter1:Ellen Johnson-Fay

Comment Excerpt Text:

Definitely worthy of managing [Upper Red Canyon] as a land with wilderness characteristics and critical environmental concern to preserve the biodiversity especially of potentially vulnerable species. Would want it closed to ATVs and open to primitve camping

Commenter1:Connor Brockmeier

Comment Excerpt Text:

I highly recommend the BLM to consider managing Cucharas Canyon as a land with wilderness characteristics.

This pristine canyon offers opportunists for respite and solitude within the canyon's walls. Specifically, the canyon's rim offers opportunities for solitude in the wooded grasslands with exceptional views of the canyon and surrounding areas. Within the canyon there excellent conditions for hiking, backpacking, hunting, and photography. Part of the appeal of this wild space is just that, it is wild.

Commenter1:Connor Brockmeier

Comment Excerpt Text:

Cucharas Canyon represents one of the only federally managed roadless area in Eastern Colorado and should be managed for its naturalness and wilderness characteristics. The area's previously human made feature's add supplemental value to the area and are being reclaimed by the forces of nature.

You have a chance to further protect an area of great cultural and biological importance. The BLM has already recognized Cucharas Canyon as an Area of Critical Environmental Concern and I encourage you to expand this designation and take the next step to further protect this canyon by managing it as a Land with Wilderness

Commenter1:Micha Rosenoer

Comment Excerpt Text:

I'm writing today to encourage the BLM's Royal Gorge office to manage Crampton Mountain as a Land with Wilderness Characteristics. I recently noticed that many of the human impacts to this area referenced by the BLM have been excluded from the Wild Connections citizen inventory report of proposed LWC's. I encourage you to to reference this report and consider Crampton Mountain in relation to the relevant wilderness criteria

Commenter1:Micha Rosenoer

Comment Excerpt Text:

I'd also like to encourage the BLM to recognize the value of Crampton's heavy vegetation and topology, which screens visitors from humanmade sights and sounds. This, along with the few entry points, geographic variety, interior trails, and general size of the unit affords visitors a great opportunity to experience solitude and wildness

Commenter1:Micha Rosenoer

Comment Excerpt Text:

In addition, I love to hike, climb, backpack, and take photographs in the area, as I know many others do, as well. These opportunities for quietuse recreation should be both recognized when considering Crampton Mountain for LWC status and protected for future generations.

Commenter1:Derick Ruiz

Comment Excerpt Text:

I encourage the BLM's Royal Gorge Field Office to manage the Thompson/Gribble/Twin (Crampton Mtn) as a Land with Wilderness Characteristics. Spaced out over 19,200 acres, this area's topographic relief combined with thick vegetation goes largely unnoticed when traveling the landscape due to its topographic and vegetative screening provided by the lands within the rest of the proposed LWC making the human impact to naturalness in the area minimal and consistent with impacts ok for BLM standards.

Commenter1:Derick Ruiz

Comment Excerpt Text:

I'd also like to highlight that the unit [Crampton Mountain] provides outstanding opportunities to experience solitude and remoteness due to the area's unique topography variety, few entry points, interior trails, and size of the unit

Lastly, Thompson/Gribble/Twin (Crampton Mtn) is home to an array of wildlife such as black bear, elk, mule deer, pronghorn, mountain lion, Albers squirrel, Brazil free tailed bat, and the Gunnison's prairiedog – a species of most concern as identified by US Fish and Widlife, as well as a variety of bird species including the bald eagle, Mexican spotted owl, scaled quail, wild turkey, Lewis's woodpecker, geese, and great blue heron.

Due to these reasons I would like to see this area preserved as an LWC with no motorized recreation allowed

Commenter1:Daryl Sena

Comment Excerpt Text:

I'm writing in support of your office's Wilderness inventory for lands contained in the Cooper Mountain unit. This particular area provides wonderful wildlife habitat and is great for hunting during the fall. The opportunity to stalk an elk without the worry of an ATV coming by and spooking the animal is somewhat rare in the area. Additionally, I recently learned that the area contains habitat for the swift fox which to my understanding has been listed as a threatened species by Colorado Parks and Wildlife. I'm concerned that if this area is not managed for its wilderness characteristics the region will lose vital lands for hunting which are important to me, my family, friends and others in the area.Hunting is a tradition in our family and I am blessed

to share this passion with my 14 year old daughter. These lands need to be protected from overuse and industry so she can enjoy these same bonding experiences with her children and grandchildren. Lastly, I'd also like to see this area managed for disbursed recreation opposed to developing more trails for biking, hiking, or other forms of recreation. Due to the area's remoteness and wonderful wildlife habitat, I encourage your office to continue managing the area as nonmotorized and off limits for oil and gas development. I also would like to express a desire for this area to be managed as a land with wilderness characteristics.

Commenter1:George Alderson

Comment Excerpt Text:

We ask BLM to give a high priority in this RMP to protecting the lands that have wilderness characteristics, and recommend them for permanent designation as wilderness. Areas such as Cooper Mountain, Badger Creek, and Sand Gulch deserve the most protective management category for which they are qualified.

Commenter1:Sharon Hale

Comment Excerpt Text:

I also support the BLM taking a close look at all areas eligible as lands with wilderness characteristics. For example, places such as Badger Creek, Stanley Creek, and Upper Red Canyon offer rare accessible opportunities for those in the Front Range to enjoy the outdoors and to find solitude.

Commenter1:Eddie Soto

Comment Excerpt Text:

As the global climate continues to change and pressures from human development expand into new areas, it will be vital that public lands remain unfragmented from roads, motorized trails, and other forms of human development. I encourage your office to utilize a diversity of management tools and prescriptions to ensure the area's wildlife habitat remains protected for generations to come. For these reasons I'd like to see your office manage the Thompson Mountain/Gribble/Twin Mountain area as a land with wilderness characteristics (LWC) and an area of critical environmental concern (ACEC).

Commenter1:Frank Swain

Comment Excerpt Text:

I encourage the Royal Gorge Field Office to manage the Stanley Creek unit as a nonmotorized area that is closed to any oil and gas exploration. I'd also like to see the office reasses its finding that this unit does not meet the minimum criteria for wilderness, specifically its findings of naturalness and lack of primitive unconfined recreation opportunities

Commenter1:Randy Mack

Comment Excerpt Text:

Due to the uniqueness of the Cucharas Canyon area, I ask that you utilize administrative tools to ensure this area remains in a natural state and protected for generations to come. Although I

support your office's findings that the impacts from human development add supplemental value, I do ask that you reassess findings associated with the area's overall naturalness. I encourage your staff to utilize the citizen's report created by Wild Connections in which you'll find justification as to why the human impacts associated with Kenner Ranch should be considered historic in nature and thus adding supplemental value

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Wilderness Characteristics. Great Sand Dunes National Park includes the Great Sand Dunes Wilderness, and about 53,000 acres of proposed wilderness. Most of Great Sand Dunes National Preserve is part of the larger Sangre de Cristo Wilderness Area. Total wilderness acreage is 7 5,225. The other NPS units and related areas have undeveloped areas that possess wilderness characteristics, important to visitors for experiencing solitude, natural quiet, dark night skies, and scenic vistas.

Commenter1:Bill and Ida Beaudin

Comment Excerpt Text:

We'd ask that you consider thoughtfully this group's LWC Data as a great amount of hard and thoughtful work went into their projects, and these are truly fine and conscientious folks!

Commenter1:Chris Canipe

Comment Excerpt Text:

It is the largest contiguous roadless area in the Royal Gorge Field Office's region at 31,600 acres, has a lack of significant human impacts, disparate topology, diverse ecosystems, and abundant wildlife. It also offers outstanding opportunities for solitude and primitive unconfined recreation, such as hiking, backpacking, rock climbing, horseback riding, and more. Furthermore, it is part of a greater connectivity corridor aligning with BLMs Arkansas Canyonlands Area of Environmental Concern for its outstanding recreation opportunities, scenic views, critical and valued species, and unique lands contained within the High Mesa Grassland Research Natural Area.

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

I am asking your office to manage this area [Thompson Mountain] as a land with wilderness characteristics. Unfortunately, I'm concerned that this request will not be fulfilled due to current management of the area claiming the landscape is unnatural due to vegetative treatment projects. However, I am asking that you be creative in your management plan by first reassessing your wilderness inventory and then omitting any lands that do not qualify as wilderness and designating the area as an ACEC.

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

I've also heard rumors of creating a network of mountain bike trails in this area [Thompson Mountain]. As a mountainbiker myself, I always enjoy finding new places to ride, but I believe this specific area is not the right place for a trail network. This is an area offering visitors the opportunity to seek solitude and engage in primitive forms of recreation such as backpacking, hiking, hunting, wildlife viewing, and photography. Creating a network of mountain bike trails would ruin this opportunity for future generations.

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

I also encourage your office to consider managing the Table Mountain and Echo Canyon area as a land with wilderness characteristics. In your office's inventory of the area, you found the area unsuitable for this management type due to impacts from vegetative treatment. This point illustrates my prior frustration toward your office's approach to fire mitigation. If you allowed natural process to occur then this point was be moot. However you did not and now here we are. From my perspective yes, vegetative treatment may be noticeable but to the average person it is not. Further, ample rewilding has occurred since this activity has taken place and if you continue to allow the natural forces to reclaim the area, within the next few years all signs of past management decisions will become unnoticeable.

Organization1:Conservation Colorado

Commenter1:Josh Kuhn

Comment Excerpt Text:

Table Mountain and Echo Canyon area is part of a greater connectivity corridor aligning with the BLMs Arkansas River Canyonlands Area of Environmental Critical Concern. However this level of protection is not enough to ensure the area is permanently protected from human development such as oil and gas exploration, mining, mechanized timber harvesting, and motorized recreation. To achieve permanent protection I again recommend your office manage the area as lands with wilderness characteristics.

Commenter1:Mary Mourar

Comment Excerpt Text:

LANDS WITH WILDERNESS CHARACTERISTICS

I support the BLM's plan to manage as lands with wilderness characteristics (LWCs) the Badger Creek South, Badger Creek/Jack Hall Mountain, Waugh Mountain and Bear Mountain/West Table Mountain areas. However, I am concerned that the BLM did not adequately evaluate all potential areas for their wilderness characteristics and I feel there are several additional areas that are equally worthy of this designation.

I have found the Wild Connections data for the ECRMP planning area to be invaluable in understanding the uniqueness of specific areas and as aides in exploring the area. For this reason, and because of the scientific basis for their data, I recommend that the BLM consider Wild Connections data in reassessing which areas should be declared LWCs. Indeed all 24 of Wild Connections recommended areas should be declared LWCs. These recommended areas should be managed to protect their wild character by:

- Closing the recommended LWCs to motorized activity;
- Prohibiting any new permanent or temporary roads;
- Declaring the LWCs closed to oil and gas leasing;
- Excluding the areas from military training activities; and
- Ensuring that wilderness characteristics are accounted for in implementation-level decisions and that any impacts areavoided, minimized and/or mitigated to all extent possible.

Specific areas I have explored and would like designated as LWCs:

1. Booger Red, Bare Hills, The Bank proposed LWC: I was amazed at the ruggedness and remote feeling of this area even though it's not far from Cripple Creek and several housing developments. It offers opportunities for solitude and to enjoy a variety of landscapes from mid-elevations

to lower creek bottoms. The remoteness and minimal human impact also enables the area to serve as a bighorn sheep lambing area, based on the herd that I saw with several lambs.

2. Table Mountain/Echo Canyon: On the three opportunities I've had to explore this area, I've never seen any other people once we've left the Texas Creek motorized recreation area. The rugged canyons, granite domes and variety of elevations and vegetation provide unique opportunities for hikers and nature lovers and include a variety of habitat for wildlife. Human impact is minimal in this area and it also includes habitat for a sensitive plant species, a species of stickleaf. Since the qualities of Table Mountain/Echo Canyon are as diverse, remote, and wild as McIntyre Hills WSA, it deserves equal protection.

3. Badito Cone units: BLM land around Badito Cone offers an opportunity to expand the protected area which includes the adjacent Greenhorn Mountain Wilderness Area. The LWC could be drawn around the single road within the area and still offer opportunities for recreationists and hunters to enjoy solitude and a variety of terrain and elevations. Exploring this area includes passing through old growth pinyon pine/juniper habitat and protected canyons with springs. We saw fresh bear sign while hiking up one canyon. The zone also seems good winter habitat and travel corridors for the Greenhorn Mountain bighorn sheep herd.

4. Thirtyone Mile Mountain: Although I was not along, my husband has hiked in this area and was amazed to find the variety of high elevation plants on the mountain, including some beautiful bristlecone pines. He saw no one else outside of his group and minimal sign of human impact. This area is as deserving of LWC protection as other BLM proposed areas.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

The BLM has inventoried lands in the Eastern Colorado resource area and determined that over 77,000 acres have Wilderness Characteristics. However, we endorse the work of Wild Connections, which has identified 246,000 in 24 areas as Lands with Wilderness Characteristics (LWCs). These 24 areas contain important wildlife habitat, significant populations of rare plants, outstanding opportunities for solitude and primitive recreation, cultural resources, scenic views and many other values. The Colorado Natural Heritage Program and the Colorado Native Plant Society have identified the areas north of the Arkansas River as having an unusual number of rare, endemic plants. We urge BLM to evaluate LWC data for the 24 areas and consider expanding your inventory of LWCs in making decisions in the Resource Management Plan.

Commenter1:Eva Bovenzi

Comment Excerpt Text:

As a citizen of Huerfano County, I am concerned that our wilderness and semi-wilderness areas be preserved for the sake of the wildlife and the human populations. Huerfano County is a beautiful, minimally developed part of Colorado, replete with an abundance of wildlife-deer, elk, bighorn sheep, bear, pronghorns, bobcats, mountain lions, beavers, badgers, eagles, and a multitude of birds-few people, and amazing dark skies at night. I believe these qualities are increasingly important to preserve, as other parts of the state and country become more and more developed. As they say, "no use is a use". So, I am in favor of oversight that preserves the wild character of this county. Designating more areas as wilderness areas would be a priority, as well as special attention paid to visual resources.

Commenter1:Jean Smith

Comment Excerpt Text:

In addition, along with likeminded citizens I helped found Wild Connections in 1995, and, as you know that organization has been in the forefront of conservation in Central Colorado especially with emphasis on roadless area and Wilderness protection and preservation of biodiversity.

I support the scoping comments submitted by the conservation community task force that represents several groups including Wild Connections.

Commenter1:Jean Smith

Comment Excerpt Text:

Lands with Wilderness Characteristics

Wild roadless areas are, in my estimation, one of the most important resources that BLM must manage to protect the wilderness values they represent. These are our remaining repositories of biodiversity, rare plants and animals, migration corridors, historical and cultural resources, and opportunities for solitude and primitive recreation. Once these qualities are lost, they cannot be recovered.

I strongly support a thorough and immediate analysis and field work on the extensive inventories of LWC's that Wild Connections has submitted to the Field Office. The 24 areas, comprising some 246,000 acres, will add significantly to BLM's current LWC inventory. In light of the detailed field inventories over several years conducted by Wild Connections' staff, interns and volunteers, I believe that additions to BLMs inventories are mandatory.

Until BLM's inventory is revised, the areas submitted by Wild Connections should be managed to preserve and protect their wilder ness qualities. This will include prohibiting motorized use and other restrictions as detailed in the above referenced citizen's comments.

Commenter1:Jean Smith

Comment Excerpt Text:

Area or trail name: Table Mountain Describe the area and your historical use/knowledge of the area (time of year and hiking, camping, photography, etc):

Table Mountain, located north of the Arkansas River between Parkdale and Texas Creek, is an immense area of rugged cliffs and small canyons backed on the north by Table Mountain which drops into Echo Canyon. The Arkansas River and railroad define the southern boundary and private land is on the north. I have hiked on the western edge, taken many photos and enjoy the scenery and occasional wildlife as I travel along highway 50.

Why is the area important from your perspective? (You may wish to speak to opportunities for Solitude, Primitive and Unconfined Recreation and the area's Supplemental Values – Ecological, Wildlife, Historical, Geological, etc.)

By virtue of its size and roadless nature, the area is ideal for primitive recreation and solitude. It is not an easy area to get into, and so one expects to see more wildlife than people, and busy highway 50 cannot be heard – a mere ribbon of tarmac in the far distance. Views of the surrounding mountains and Sangres dominate the skyline. Table Mountain is not only large at more than 31,000 acres, it is also diverse. Elevations range from about 9,500 feet on Table Mountain to less than 6,000 feet along the River. This variation in topography results in a variety of ecosystems including pinyon-juniper woodland and oak scrubland, montane grasslands and mixed forests of ponderosa pine, Colorado blue spruce, and Douglas fir, as well as riparian drainages and natural springs. These provide habitat for a wide range of species such as Rocky Mountain bighorn sheep, elk, pronghorn mule deer, black bear, mountain lion, Brazilian free tailed bat and Gunnison' prairie dog, bald eagle, American peregrine falcon, Mexican spotted owl, scaled quail, wild turkey, and great blue heron. Rare plants, such as Arkansas Canyon Stickleaf, Degener beardtongue, Fendler Cloak-fern, jeweled blazing star and narrowleaf cottonwood – river birch riparian woodland, are found here. Historical and cultural values include old mining and ranching use and there are reminders of native people's found in wikiup sites and lithic scatter.

How would you like to see this area managed by BLM and why? (For example as a 'Land with Wilderness Characteristics' or an 'Area of Critical Environmental Concern'.)

Table Mountain, Echo Canyon should be managed as Land with Wilderness Characteristics (LWC) as it not only qualifies based on size, naturalness, opportunities for primitive recreation and solitude, but has numerous supplemental values, some of which are mentioned above, that deserve to be preserved for future generations. In conjunction to be managed as an LWC, this area should also be closed to oil and gas leasing and motorized recreation to preserve these values.

Commenter1:Jean Smith

Comment Excerpt Text:

Area or trail name: Badger Creek –Jack Hall Mountain Describe the area and your historical use/knowledge of the area (time of year and hiking, camping, photography, etc):

Badger Creek-Jack Hall Mountain, located north of the Arkansas River east of Salida and north of Wellesville, is roughly 12,000 acres and is adjacent to the US Forest Service Badger Creek roadless area directly to the north and west. It includes the downstream end of Badger Creek which is one of the few large perennial stream drainages in this part of the Arkansas canyon-lands. I have visited this area a number of years ago, particularly on the south and east sides.

Why is the area important from your perspective? (You may wish to speak to opportunities for Solitude, Primitive and Unconfined Recreation and the area's Supplemental Values – Ecological, Wildlife, Historical, Geological, etc.)

A few yards into the interior beyond the boundary roads the rather rugged topography, gulches and rolling forested hillsides provide solitude and visual isolation. Hiking, backpacking, photography, bird and wildlife watching are available all four seasons in the lower elevations. Badger Creek provides fishing opportunities. A variety of plant and wildlife habitats are found across the area, ranging from pinyon-juniper woodlands to aspen and Colorado blue spruce mixed forests, as well as montane grasslands. Large mammals include black bear, elk, mule deer, pronghorn, Rocky Mountain bighorn sheep, and mountain lion. Birds include bald eagle, various hawks, turkeys and woodpeckers among other common birds. Brook trout are found in Badger Creek.

There are remnants of historical mining and ranching and older stewardship projects in the area which led BLM to decide the area did not have wilderness characteristics. However, it appears that many of these former human impacts are disappearing and when the larger area of some 12,000 acres is considered are relatively minor. See Wild Connections Badger Creek-Jack Hall Mountain LWC report for documentation and other examples.

How would you like to see this area managed by BLM and why? (For example as a 'Land with Wilderness Characteristics' or an 'Area of Critical Environmental Concern'.) This unit should be managed as Lands with Wilderness Characteristics in order to preserve its wild values. I believe that Wild Connections has adequately justified this designation.

Commenter1:Misi Ballard

Comment Excerpt Text:

I feel that Reinecker Ridge clearly and easily meets the requirements for designation as a Land with Wilderness Charactistics and should be protected as such. Being adjacent to James Mark Jones SWA provides the acreage necessary, the natural environment found there, with some but few signs of human impacts, the many opportunities for solitude and primitive recreation, the abundance of wildlife and the areas' importance as wintering and calving lands for big game herds all combine to make Reinecker a prime candidate for LWC designation.

Commenter1:John Sztukowski

Comment Excerpt Text:

Table Mountain, Echo Canyon should be managed as Land with Wilderness Characteristics (LWC) as it not only qualifies based on size, naturalness, opportunities for primitive recreation and solitude, but has numerous supplemental values, some of which are mentioned above, that deserve to be preserved for future generations. In conjunction to be managed as an LWC, this area should also be closed to oil and gas leasing and motorized recreation to preserve these values.

Commenter1:Kenneth Sajdak

Comment Excerpt Text:

I am writing to urge you to consider the work, research and findings of Wild Connections in their BLM Wilderness Inventory. This group is well informed, dedicated to their stated mission, and interested in preserving our public lands. I would ask you to take into serious consideration their proposals for LWC designations for the Stanley Creek, Badito Cone, and Cucharas Canyon lands

Organization1:Conservation Colorado

Comment Excerpt Text:

I also support the BLM taking a close look at all areas eligible as lands with wilderness characteristics. For example, places such as Badger Creek, Stanley Creek, and Upper Red Canyon offer rare accessible opportunities for those in the Front Range to enjoy the outdoors and to find solitude.

Commenter1:Kate Spinelli

Comment Excerpt Text:

The Sangre de Cristo Foothills Contiguous units should be managed as a Lands with Wilderness Characteristics based on its size, naturalness, opportunities for primitive recreation and solitude. Although none of the individual units in isolation meet the 5,000 acre size requirement, they should be evaluated as a contiguous whole, which is the nature of the land, thus potentially qualifying them for LWC protection. The land's extraordinary supplemental values, as described above, create a special natural community that should be preserved in its state. To protect this resource truly, the area should be closed to oil and gas leasing and motorized recreation.

Commenter1:Kate Spinelli

Comment Excerpt Text:

Stanley Creek, Green Mountain should be managed as a Lands with Wilderness Characteristics based on its size, naturalness, opportunities for primitive recreation and solitude. These, in conjunction with the area's rich supplemental values described here, make the area a special resource that should be protected in its state for others to enjoy and for the health of the greater local ecosystem and environment. The area should also be closed to oil and gas leasing and motorized travel to protect those resources in actuality on the ground.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

We support the BLM determination that the 90.7-acre Ruby Mtn and the 2448.5-acre Railroad Gulch areas are Lands with Wilderness Characteristics.

Commenter1:Kevin Bradley

Comment Excerpt Text:

[Arkansas Valley watershed between Leadvillea and Pueblo Reservoir] Why is the area important from your perspective? (You may wish to speak to opportunities for Solitude, Primitive and

Unconfined Recreation and the area's Supplemental Values – Ecological, Wildlife, Historical, Geological, etc.) This area is significant in terms of its geological record, it's colorful and historic past, the wildlife habitat (both for permanent and migratory residents) and its unique ecological diversity. It is my church, my teacher, and my comfort. The diversity of minerals, geologic record, and view-scape are a matter of public record. Think dinosaurs, fossils, 100s of millions of years of history exposed and yet discovered. It also historically significant to the human record, whether it is first peoples, as a meeting place for the diverse groups of pre-European settlers, or for the settlement by modern Americans as a bread basket, and the source of natural resources in the modern era. The wildlife too is a measure of the critical nature of this scared space. It is a breeding ground for a vast array of plants, birds, animals, and fish, to say nothing of the insects, and smaller biological beings. Water and fire are also critical elements of this space presenting both opportunity and danger. As a native Coloradan, I have seen firsthand the tremendous growth of urban areas and the diminishing wild spaces that offer a record of abundance and scarcity that may be the critical climactic classroom for our very survival, to say nothing of the solitude and awe that it instills in both the casual visitor and long-term resident.

Commenter1:James Lockhart

Comment Excerpt Text:

In terms of human access, it [Echo Canyon/Table Mountain area] therefore compares favorably with the McIntyre Hills WSA. It offers better opportunities for extreme solitude than are available even in most designated Wilderness Areas. In this respect, the area clearly qualifies as lands with wilderness characteristics, and should be managed accordingly. Much of the area is already within an Area of Critical Environmental Concern, and this management prescription should continue.

Commenter1:James Lockhart

Comment Excerpt Text:

I have visited both the South Badger Creek and Cooper Mountain areas on several occasions and agree with the BLM's assessment of them as lands with wilderness characteristics. Both areas should be protected and administered as such. I note that there appears to be considerable motorized trespass into the Badger Creek area, and that the major drainage (described on some offroading websites ten or more years ago as "Little Canyonlands") required the BLM to construct barriers to prevent rockcrawlers from taking motorized vehicles up it. These protections should be maintained. Cooper Mountain is adjacent to a mountain biking area along County Road 9, also known as Shelf Road. These mountain biking trails should not be extended into the Cooper Mountain LWC.

Commenter1:Emil McCain

Comment Excerpt Text:

[Stanley Creek & Badito Cone, Cucharas Canyon]These two LWC's and the 1 ACEC should be closed to military training activities, including landings associated with High Altitude Mountain Environment Training.

Commenter1:Emil McCain

Comment Excerpt Text:

Stanley Creek contains a great expanse of beautiful, undisturbed, public land including wildflowers, quartz outcroppings, abundant wildlife, birds, butterflies, rushing creeks, historic decaying log cabins, and full views of mountains. I have hiked extensively in and around the Blanca Basin area. This is an area that meets the qualifications of Land with Wilderness Characteristics and should definitely be designated as wilderness

Commenter1:Emil McCain

Comment Excerpt Text:

Badito Cone is the focus of the view from my bedroom window on my family's ranch. It should be preserved as wilderness to provide a corridor of connectivity between the herd of Rocky Mountain Bighorn Sheep in the Black Hills area a few miles south of Badito Cone and the Rocky Mountain Bighorn Sheep within the Greenhorn Wilderness area

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

We support the BLM determination that certain areas, including Ruby Mt, South Badger and Railroad Gulch, are Lands with Wilderness Characteristics. We think the BLM should take a hard look at the data and recommendations presented by Wild Connections which support many additional areas and acres as having Wilderness Characteristics.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

III. Deer Haven

Recommend combined LWC and Wildlife Priority area designation Please apply all relevant sections above to this subunit

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

IV. Thompson/Gribble /Twin Mountains -

This area is isolated from surrounding lands by topography – p. 22 TMP Recommend combined LWC and Wildlife Priority area designation Please apply all relevant sections above to this subunit

Designate as Wildlife Priority Area for Deer

Designate as LWC to maintain existing uncrowded primitivie social settings

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

For Booger Red Hill, the Gulches, Deer Haven and Twin Mountain

As recommended in section 1 above, combined Habitat Priority Area and LWC designation is far and away the best way to protect the critical core wildlife habitat found in these four subunits ¬¬¬both managerially, and to assure persistence of their stressed wildlife populations into the future.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should evaluate the Wild Connections LWC inventory, enclosed with these scoping comments, which meets the minimum standards for review of new information as set forth in BLM Manual 6310. BLM should document this evaluation and make the documentation and findings available to the public as soon as practicable, and before BLM moves forward with developing management alternatives for the lands included in the citizen inventory.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM did not find wilderness characteristics due to naturalness in many units – citing the accumulation of minor human impacts – impacts primarily consisting of linear features such as old routes, illegal off-highway vehicle (OHV) use, rangeland management features, vegetative treatment projects, or previous prospecting, mining, and logging. This is the case for BLM inventoried Thirty-One Mile Mountain (COF-020-061), Crampton Mountain (COF-020-049), Eightmile Mountain (COF-020-050), Upper Red Canyon (COF-020-070-A), Grand Canyon Hills (COF-020-057), North of Cotopaxi (COF-020-056), and Echo Canyon (COF-020-019).

However, BLM does not apply this same overly strict approach to assessing naturalness in all units. BLM did find wilderness characteristics on similar BLM lands, in the same region, despite the BLM reports for these areas listing the same minor human impacts. For example, BLM did find land with wilderness characteristics on Waugh Mountain (COF-020-041) even though BLM's report cites illegal OHV use, evidence of timber harvest, linear disturbances (routes), former logging and prospecting, timber stand improvement projects, and range use. Similarly, BLM did find wilderness characteristics in the Bear Mountain unit (COF-020-071), even though BLM reported linear features (routes), illegal OHV use, vegetative treatment projects (including roller chopping), and range use.

BLM should reassess the current inventory for naturalness in the manner of these last two examples (Waugh Mountain and Bear Mountain) so that an overly strict interpretation of naturalness, which BLM Manual 6310 cautions against, does not persist.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must update its LWC inventory in response to the above comments and additional substantive comments and new information included in the enclosed Wild Connections inventory reports. BLM should update the inventory and post it for public review prior to using that information to inform planning decisions, including developing management alternatives, per Instruction Memorandum 2013-106.

Commenter1:Claude Neumann

Comment Excerpt Text:

Much has changed over those years and I have observed that a common theme among so many residents of Colorado is the importance of open spaces and opportunities for recreation and

escape. My personal enjoyment includes hiking, kayaking, back country skiing, and enjoying wildlife, plus just plain appreciation for the expansive vistas of these areas.

In many ways the BLM lands have been forgotten lands, never properly evaluated or protected, dismissed as important only for needed raw materials. But with an ever-expanding population and remarkable increase in those seeking recreation, refuge to nature, and balance in life, I believe there is increasing recognition of the many outstanding wild characteristics these lands offer. But perhaps most importantly, these lower elevations are an important complement to the higher elevation lands that have received much more protection. They are much needed additions for a complete biodiverse system for wildlife habitat, critical corridors for wildlife travel, and diversity of plant species. Recognizing the important role the lower elevation lands play, presents an important opportunity to set aside those lands critical to their survival. I am hopeful that these areas in the Eastern Colorado RMP finally will receive their due attention.

Wilderness Characteristics – I am disappointed that the BLM found only 77,765 acres qualifying as wilderness. I feel this was not a complete inventory. The field work done by the group Wild Connections in their extensive and well documented survey, found three times that amount over twenty four areas. This work was based on meeting the basic criteria used for identifying wilderness characteristics. The results appear similar to the significant disparages in surveys done years ago in Utah. The Wild Connections analysis appears to be a more comprehensive inventory and I encourage the BLM to closely examine their results and give re-consideration to the areas they found having qualifying wilderness characteristics. It is so critically important to protect areas that remain for wildlife species survival.

Commenter1:Cathy Besmar

Comment Excerpt Text:

The large natural areas in the Gold Belt region and Bighorn Sheep canyon should be protected as Lands with Wilderness Characteristics and Areas of Critical Environmental

Commenter1:Rosemary Brinko

Comment Excerpt Text:

I would like Upper Red Canyon (Booger Red Hill) see it managed as a Land with Wilderness Characteristics since il affords solilude and is mainly undeveloped al this time. While standing on the canyons and rolling rocky hills allowed me to feel as though I was alone is a vast landscape.

Commenter1:Rosemary Brinks

Comment Excerpt Text:

Describe the area and your historical/knowledge of the area:

Mid June hike Large mixed coniferous forest with small heavily forested canyon Accessible through a gated community We saw signs of bear activity, we saw minimal human activity. A stream crossed the area. We saw an abundance and a variety of wildflowers.

Why is the area important from your perspective?

The area is a connector between Beaver Creek Wilderness area and Aike Canyon for wildlife to migrate during the year. Othe adjoining land tracks and privately held area accessible through

a gated community. Additionally the area provides opportunities for solitude and viewing wildlife. The area spans several zones as we saw [illegible], wild roses, and raspberry at the high elevation along with fern. Though the area was logged many years ago the area still contains some very old trees.

How would you like to see the area managed by BLM and why?

The area is already a Land with Wilderness Characteristics. It should remain that and be included in the wilderness area to protect it for wildlife migration and encourage the plant diversity.

Additional Comments:

If the private owners would allow it, it would be great to build a trail from Aiken Canyon through private property into this area for people to explore.

Commenter1:Leslie Champ

Comment Excerpt Text:

Chipeta Pahone Foothills:

I support the development of the wild Connections spine of the continent Initiative and think Chupeta Foothills is important to include.

I would like to see this area managed as Lands w/ Wilderness Characteristics

Commenter1:Allen Lane

Comment Excerpt Text:

Badger Creek Sand Gulch

Describe: Hike the area several times a year.

Importance: Like the remoteness and nature vistas and varied geography. There's always things to discover from incredible rock formations to east human impact.

Managed: These areas are important to protect for wilderness

Commenter1:Gary Marx

Comment Excerpt Text:

I'd like to see the area managed by BLM as a land with wilderness characteristics. Would be great to have this area linked to Aiken Canyon (nature conservancy) and Beaver Creek as an important ecosystem corridor to preserve.

Commenter1:Gary Marx

Comment Excerpt Text:

Upper Red Canyon

Description: I hiked the area during the last weeks of June. Very beautiful area, with meadoes and wild flowers, rocks, trees, high creek etc. Followed a trail for part of the hike.

Importance: Diversity of vegetation, untrampled areas, rolling hills with fairly dense vegetation. Very little sign of human made structures e.g. signs, barbed wire. Even though I hike with a group, there was a sense of solitude eg. being secluded with trees, no sights of humans etc. Upper Red Canyon could have areas for climbing etc. Several sites during the high creek would be excellent for camping, and fishing.

Management: I would like to see the area designated as a "Land with wilderness characteristics."

Commenter1:Joel Marx

Comment Excerpt Text:

Management: This area should have its boundaries changed so that the majority of the acreage can be managed as Lands with wilderness characteristics. (Booger Red Hill/Upper Red Canyon)

Commenter1:Torrie Sauer

Comment Excerpt Text:

I think this area would be best managed as a Land with Wilderness Characteristics. This is because I appreciate the natural aspects of this land. The minimal trail is nice for when you want to get away from everything and just be in nature and in a more primitive atmosphere. (Booger Red Hill)

Commenter1:Deborah Sheinman

Comment Excerpt Text:

Upper Red Canyon (Booder Red Hill)

Description: We hiked about 8 miles of this lovely area on June 27, 2014 crossing High Creek and traveling up in the Rock Gulch.

Importantce: The beauty of the vistas are breathtaking. The high Creek and Hole in the Rock Gulch are lovely areas untrampled by humans. The opportunities for solitude are plentiful. These areas consisting of 23,000 acres are adjacent to other WSA's and provide a major winter feeding ground for grazing animals. There are no roads in these areas and Id like them to remain that way. The riparian areas in Upper Red Canyon are extremely important for water quality downstream and wildlife in the area. The natural beauty of the area should remain unchanged for future generations.

Management: This area needs to be designated as a Land with wilderness characteristics.

Commenter1:Deborah Sheinman

Comment Excerpt Text:

Beaver Creek East

Description: We had a delightful hike through Beaver Creek East. THe diversity of the mixed conifer forest was amazing given the low altitude. We learned about the history of the old fox farm on the hike.

Importantce: It's wonderful to have a wild area with such solitude near Colorado Springs. The proximity to Aiken Canyon and its utility as a wildlife corridor cannot be understated. The diversity of the vegetation including montane and foothills flora is also of prime importance.

Management: This needs to be designated as a Land with wilderness characteristics.

Addtional: If inholding in the area could have conservation easements this would greatly help wildlife transition from the mountains to plains with the turn of the seasons. Combined with Aiken Canyon, this would be an excellent wildlife corridor.

Commenter1:Mark Zander

Comment Excerpt Text:

Browns Canyon South

Description: Hiked and camped in Railroad Canyon for photography and fishing

Importance: Very scenic area with historical significance

Management: Lands with wilderness characteristics

Additional: No roads in area

Commenter1:Alan Robinson

Comment Excerpt Text:

It appears that in the Jack Hall unit the WC report suggests extensions to the BLM recommendation, and these seem to be supported by the additional data WC supplied. Since there is little difference in the two views I hope these two LWCs eventually appear in the RMP preferred alternative, hopefully accounting for the Jack Hall extensions. I would only add a personal observation that from the perspective of a foot traveler Badger Creek is a spectacular wilderness experience easily comparable to the rugged interior sections of the newly-proclaimed Browns Canyon NM

Commenter1:Eleanor Linke

Comment Excerpt Text:

I wish to state my suppoet for the designation to the Stanley Creek LWC and the Cuchara Canyon and Badito Cone to be designated as Land with wilderness characteristics and not be open to oil and gas leasing or mineral extraction. I am a home owner in the Huerfano Valley for the past forty yearsThese BLM land sections are pristine hiking,hunting camping and valuable wild animal habitats. Economically the Huerfano Valley benefits greatly from the tourist industry that includes outdoor adventure.

Commenter1:Douglas Blytheman

Comment Excerpt Text:

I wish to support the proposal presented by Wild Connections to increase protection for the BLM wilderness areas in eastern Colorado.Stanley Creek, the Badito Cone, and Cuchara Canyon are all pristine areas in Huerfano County that deserve protective status. Encouragement of tourist

opportunities in our area is a very important aspect for economic development which we greatly need. Oil and gas development will destroy our special and fragile environment ,and won't create jobs that wil be lasting.

B.1.16. Forestry

B.1.16.1. Forestry - Alternatives

Total Number of Comments: 4

Summary

The RMP should include proactive forest management actions to mitigate unhealthy forest conditions and to enhance wildlife habitat. The BLM should consider using mechanical treatments and restoring fire to achieve early seral or early successional habitat in forests. The BLM should remove beetle-killed trees. In the Jack Hall Mountain area, the BLM should continue testing increasing meadows and thinning forests.

See Section 2.3.1.14, Forestry (p. 25)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

In many circumstances, species composition and the density and accumulation of forest vegetation make the use of fire both risky and costly. In those situations, mechanical thinning or other treatments may be appropriate before fire can be reintroduced. Early seral or early successional habitat in forest types can be achieved by mechanically thinning and restoring fire to more naturally open direction ensures that these projects are coordinated with the objectives for elk management.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Forestry

Park County supports a proactive forest management policy, and agrees with the AMS document regarding Wildland Fire Ecology and Management as stated below:

“Potential decisions for the RMP revision will be related to managing wildfires to achieve a balance between suppression, the protection of life, property, and natural resources, and the management of wildland fire for resource benefit, to regulate fuels, and maintain healthy ecosystems and vegetation conditions. In addition, vegetation treatments and prescribed fire projects to reduce fuels to lower the intensity and severity of wildfires on the landscape and to improve ecological conditions will also be considered.”

As stated in the AMS, "A majority of forested acres in the planning area are at moderate to high risk from catastrophic wildfire because they are overly dense, have ladder fuels, and have standing dead trees resulting from beetle kill." Therefore, Park County supports proactive forest management to mitigate unhealthy forest conditions. Additionally Park County supports forest management activities that enhance wildlife habitat with the understanding that some sensitive forest habitats may require additional public input prior to any mitigation actions.

Organization1:GPAA/Public Lands for the People

Commenter1:Garry Vaughn

Comment Excerpt Text:

Forestry- Removal of beetle kill

Commenter1:Rosemary Brinko

Comment Excerpt Text:

How would you like to see this area managed by BLM and why? (For example as a 'Land with Wilderness Characteristics' or an 'Area of Critical Environmental Concern'.):

(Jack Hall Mountain) Stay as it is as an area to test increasing meadows and thinning the forest.

B.1.17. Livestock Grazing

B.1.17.1. Livestock Grazing - Alternatives

Total Number of Comments: 16

Summary

There is a long history of livestock grazing in the planning area. The BLM should continue offering livestock grazing leases and should include long-term plans to sustain grazing. Grazing should be managed in compliance with respective resource management. Specifically, grazing systems should be compatible with desired levels of elk and other wildlife and should be managed in a manner that leads to plant communities achieving ecological potential. The RMP should include an adaptive site-specific approach for land health monitoring. The BLM should work with permittees to collect monitoring data.

See Section 2.3.1.15, Livestock Grazing (p. 25)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF encourages the BLM to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.

Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range

management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. Many of the base properties associated with grazing allotments provide important wildlife habitat and may constitute a large part of the winter range for elk.

Organization1:Elk Glade Outfitters, LLC

Commenter1:Jim Johnson

Comment Excerpt Text:

Please continue to offer grazing leases. The historic use of these lands in and around the Beaver drainages has been cattle ranching. Cattle, proper1y managed, are good for the land and again, keep these historic ranches undeveloped by allowing an economic alternative to development.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Livestock grazing has been a historic use of BLM lands in Park County. The objective being to sustain a level of grazing that is compatible with the land. Both the revised RMP and MLP should relate long term plans for livestock grazing.

Commenter1:Dan Murray

Comment Excerpt Text:

No overgrazing or non-payment of grazing fees allowed (Clive Bundy, NV)

Commenter1:Tim Canterbury

Comment Excerpt Text:

Grazing should continue with no net loss in grazing AUMs. Special interest and ESA's should not dictate show we manage. Make certain that grazing continues under the Taylor Grazing Act and permitee is allowed administrative ability under travel management.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Grazing Management:

Livestock grazing shall be managed in a manner that leads to the woody and herbaceous plant community achieving its ecological potential in terms of the diversity of species in quantities of production expected for the site.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Persistence and overall health of bighorn sheep populations continues to be a priority for CPW. Particularly, CPW is concerned about potential interactions of wildlife bighorn sheep with domestic sheep and goats in the RMP area. Interactions between domestic sheep and goats have proven fatal for wild bighorn sheep. At this time, CPW is not aware of any active domestic sheep or goat allotments in the RMP area. However, we are still concerned about the potential risk associated with the use of domestic sheep, or domestic goats for weed control or fire mitigation. If these activities might be used in the future, we would ask that the BLM run the “risk of contact" model and refrain from using domestic sheep or domestic goats in areas where the threat of interaction is possible. (Recent Colorado Western Slope Resource Management Plans have run the federal agency's “risk of contact" model).

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

2. Livestock Grazing on BLM Lands: Agriculture is one of the most stable industries in the nation. Agricultural producers provide food for American citizens and stable employment for families. Continuing access to our public lands for grazing use will help to keep these jobs and keep our small farms and ranches viable.

a. BLM must consider the fact that farmers and ranchers are the longest standing group of citizens concerned about the health and productivity of the land. The term “health” can be defined in many ways, but healthy habitats can and have been achieved for centuries with livestock grazing as a central management objective. Grazing use must be at the core of any management plan for the future.

b. In order to maintain our rural communities, livestock grazing must continue to be a central focus of any planning effort on BLM lands. Grazing permittees work with the RGFO to manage healthy allotments. The BLM must consider the historical and scientific data showing that rangeland ecosystems that include livestock grazing have been proven to be healthy and sustainable.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County agrees with the approach to livestock grazing presented in the AMS document and the Adaptive Management Toolbox, Table 4.16 Page 325. The County supports no grazing on the Mosquito Pass ACEC and an analysis of grazing and potential management strategies regarding grazing actions on other applicable ACECs that may be designated in the updated RMP.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Comment Excerpt Text:

By law and by litigation, assessments must provide for the full range of alternatives. The assessment should include increasing the AUMs to meet this requirement.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

There are inherent disadvantages of inflexible, “one-size-fits-all” standards [for livestock grazing]. An adaptive, case-by-case approach will ensure that efforts and resources are well spent. Ecosystems vary; site potential, plant communities, environmental influences, precipitation patterns and plant production and vigor are highly variable and cannot be appropriately managed by single-source standards and guidelines. The regulations should give flexibility to land managers.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Methodology of monitoring should be flexible enough to allow local input and modifications on the adaptability of the resource. Monitoring should compel decisionmaking for adjustments in multiple-use activities only when adequate data justifies decisions.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

In accordance with the Memorandums of Understanding (MOUs) between Public Lands Council (PLC) and both BLM and FS, (WO 220-2004-0 and NO. 09-SU-11132421-171, respectively), the agencies should work cooperatively with permittees to collect data and accept monitoring data collected by permittees.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Regarding adequate residual plant cover, the regulations should reiterate that ecosystems vary and should not be managed by a “one-size-fits-all” approach, but rather by an approach that allows land managers, local working groups and grazing permittees to collaborate on management practices that benefit the. Structure objectives that are consistent with the multiple needs should then be developed. The above-mentioned decision makers should determine appropriate levels of grazing and grazing systems that will contribute to healthy resources in any given area.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Grazing systems should be implemented and managed to comply with the respective resource area management. Site-localized, long-term trend monitoring should be the basis for determining compliance with management plans. Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the GUSG, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions.

Commenter1:Michael Oswald

Comment Excerpt Text:

Livestock grazing can have a very beneficial effect on the reduction of wildfire threat especially winter grazing. Using cattle to graze down dry and dormant grass removes the first step on the wildfire ladder. I see a great value in the reduction of the P/J canopy not only for the resulting increase in vegetation but an increase in wildlife habitat as well as visual resources and wildfire control.

In order to assure that grazing permittees are able to perform the task of managing the way cattle are grazed I belive it is imperative for permittees to be given administrative use on their allottments.

B.1.17.2. Livestock Grazing - Baseline Affected Environment

Total Number of Comments: 7

Summary

Livestock grazing provides benefits for land and vegetative health and local communities; the RMP should include the commenter-provided references. The BLM should use Land Health Assessments properly, as this form of monitoring is limited. The RMP should include the State Land Board-provided information on state land board lease terms, which could impact BLM leaseholders.

See Section 2.3.1.15, Livestock Grazing (p. 25)

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Assessments are often based on Landscape Health Assessments (LHA) and short term trends. According to Pyke et.al. management should not be changed solely on the findings of this approach, but this approach may be used in conjunction with quantitative monitoring data that do provide a temporal assessment of trend. LHA was developed as a tool for conducting a moment-in-time qualitative assessment of rangeland status. LHA provides a snapshot of ecosystem status relative to an expected status for lands within the identified ecological site. In addition, developers of LHA indicate that management should not be changed solely on the findings of LHA alone but in concert with long-term quantitative monitoring data that do provide trend data. LHA does not determine the cause of the assessment. The LHA interpretation process is the critical link between observations of indicators and determining the degree of departure from a reference condition for the range. This degree of departure is the critical component of determining LHA. To characterize reduced habitat quality as reflected in LHA objectives and to extrapolate across to likely negatively impacting Sage-grouse is not the appropriate use of LHA. Allotments cannot meet LHA objectives for numerous reasons outside of livestock grazing. The statement that indicates that allotments or areas are not meeting LHA objectives indicates that habitat conditions are likely degraded for Gunnison sage-grouse in portions of its range, and that domestic livestock grazing is contributing to these conditions is outside the scope of use of LHA. LHA not being met can be attributed to numerous factors outside of livestock grazing. One particular case is the percentage of cheat grass. Just having this one factor above a one-size fits all standard shows the allotment as not meeting LHA standards.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Not meeting LHA standards does not take into account ecological site soil and hydrology. Specifically, research from the University of Wyoming shows that every acre will not meet the guidelines because of the limitations of the soil and timing of precipitation. Research has never determined what percentage of the landscape has to meet the guidelines to meet the species needs. There is tremendous ecological variation naturally across the landscape and this variation lends itself to areas not meeting guidelines. Range science will indicate that soil constraints will determine site potential

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Sound scientific research indicates that grazing is beneficial to flora and fauna in multiple ways. Grazing reduces the instances and severity of wildfires (Launchbaugh et al. 2007), and can be used to control invasive weeds (Olson and Lacey 1994, Walker et al.1994). Furthermore, grazing with appropriate range improvements can be utilized in some areas to improve habitat to mitigate for the disturbance caused by other multiple-use activities, such as mineral development.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

It must be recognized that factors including snow load, rain, wind and other grazers (including insects) significantly impact residual plant cover, especially for the subsequent spring measurements. If residual plant cover is to be measured, all factors must be taken into consideration.

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

Managed livestock grazing programs have the potential to maintain habitat diversity and quality for species. For example, research shows that grazed lands produce forb growth and are preferred to non-grazed lands by greater sage-grouse (Evans 1986). Additionally, research shows that nesting cover (under-canopy vegetation) remains adequate with up to 40 percent utilization levels and is not substantially diminished until later in the grazing season, thus indicating that a variety of grazing regimes may be implemented without adversely affecting nesting (France et al.) In areas of high production, utilization in excess of 40 percent will still result in adequate nesting cover.

Organization1:Colorado State Land Board

Commenter1:John Valentine

Comment Excerpt Text:

It is my understanding BLM allotments are awarded to lease holder based on their contol or ownership of either lands. The SLB lease holders have used their SLB lease to secure BLM leases. I wanted to make BLM aware that the leases are only ten years in length and with one year notice they can be cancelled.

Commenter1:Steve Oswald

Comment Excerpt Text:

1) Grazing animal play vital role in healthy landscapes. There is more than enough scientific data on hand that shows removal of grazing animals from the landscape promotes land degradation and desertification. Grazing animals can and do have a major positive impact on the water cycle, the diversity of plant life, and the recycling of minerals. 2) Ranching operations that have BLM grazing permits provide many positive benefits to the greater community. Stewardship of publicly owned lands through development and upkeep on things like water development for wildlife and livestock. These ranching operations also contribute economically to the surrounding community. They also raise a healty product enjoyed by many- beef. 3) Decisions made in one area of BLM's purview should be in harmony with established grazing practices. For instance, placement of trailhead for recreational purposes should be mindful of the potential impact on livestock operations. Don't place signage where a salt lick has been for years or develop trail systems that might be used and then over-used by livestock.

B.1.17.3. Livestock Grazing - Impacts

Total Number of Comments: 1

Summary

Off-highway vehicle traffic impacts rangeland health.

See Section 2.3.1.15, Livestock Grazing (p. 25)

Commenter1:Michael Oswald

Comment Excerpt Text:

As a grazing permittee I am very concerned with health of vegetation and the [illegible] areas in my allotment as well as the presence of noxious weeds. OHV trafic that seems to be increasingly taking place in areas not designated for travel and the accompanying adverse effects of such travel in rangeland health are a major concern to me. As livestock grazing permittees we are held to some pretty high standards and these standards are enforced. I want to see everyone who uses public land held to the smae standards in order to limit the degredation of vegetation and reduce the speed of noxious weeds.

B.1.18. Recreation and Visitor Services

B.1.18.1. Recreation and Visitor Services - Alternatives

Total Number of Comments: 32

Summary

The BLM should provide additional opportunities for a variety of recreational activities, such as hunting and fishing, dispersed camping, mountain biking, target shooting, and special events. The BLM should continue offering opportunities for outfitters and guides. The BLM should restrict some activities, including target shooting and OHV recreation. The BLM should take

a "hands-off" approach to recreation and limit the number of management objectives. Specific areas should identified for recreation and camping opportunities, such as the area between Salida and Cañon City near Mt. Shavano, from Mosquito Peak south to Mount Sherman, Reinecker Ridge, Red Hill Pass, Guffey Gorge, and Sheep Creek Road.

The BLM should engage in partnerships with other organizations and agencies but should carefully review those partnerships for conflicting goals.

Flexibility should be maintained to manage the Arkansas Headwaters Recreation Area according to CPW management plans and objectives. Recreation management elements of the Arkansas Headwaters Recreation Area should be reviewed for possible inclusion in the RMP.

See Section 2.3.1.16, Recreation and Visitor Services (p. 26)

Organization1:Colorado Outfitters Association

Commenter1:Bill Canterbury

Comment Excerpt Text:

Hunting has been a historical part of history on BLM lands. I would ask that hunting be considered in the land use proposal. Hunting has traditionally brought in money for the local economy and outfitting has also contributed to the local economy. Outfitting could greatly be affected if it were to be left out of the land use plan.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

The BLM Land Use Plans and other planning documents should provide for the continuation of public-land hunting and recreational shooting as a valid and vital component of the recreation spectrum. The plans should also consider and give direction for maintaining such aspects as dispersed camping (old traditional camp sites), outfitters and guides, and travel management.

Commenter1:Sean Ryan

Comment Excerpt Text:

Please conserve BLM backcountry hunting and fishing areas that provide intact habitat and a quality outdoor experience.

Organization1:Elk Glade Outfitters, LLC

Commenter1:Jim Johnson

Comment Excerpt Text:

Please continue to offer hunting leases. We use all of the revenues we enjoy from our hunting operations to save the East Beaver Valley from development. My grandfather homesteaded there in 1929 and our ranch headquarters is on an 1888 homestead. Our hunting operations also bring in $20K to $30K annually of license fee revenues to the state and some revenue to BLM.

Commenter1:Jan Zinkl

Comment Excerpt Text:

I would like you to establish a Recreation Management Area along the entire Arkansas River from Leadville to Salida

Commenter1:Red Carpenter

Comment Excerpt Text:

Educating the public is the best way to help people respect and enjoy the public lands. The land belongs to the people- educate them on how to use it properly. Thanks.

Organization1:Cowboy Camp Outfitters

Commenter1:Bob Port

Comment Excerpt Text:

I am an outfitter permittee in South Park on BLM and National Forest. I would like to see target shooting on public land prohibited during designated big game seasons. There is nothing more frustrating than taking a client out before daylight that has spent thousands of dollars for the hunt of a lifetime and then have someone start ripping off hundreds of rounds target shooting.

Commenter1:Ken Last

Comment Excerpt Text:

On recreation, People have figured out where to go to do the stuff they want to do. They know not to hike in the shooting range or Brush Hollow off road area. Don't micro manage, leave people alone to figure it out. Stop having "specific recreation objectives". Leave people to figure that out. It changes over time. Take a hands off approach as much as possible.

Commenter1:Monica Steensma

Comment Excerpt Text:

The Gorge's wild and remote public lands, including Cooper Mountain, Badger Creek, and Sand Gulch, MUST RECEIVE careful & conservative management that keeps them wild, undeveloped, unpolluted, viable as habitats, & accessible to hikers, campers and sportsmen. The values that these unspoiled places offer to local communities, as well as out of state visitors, HAVE TO BE PROTECTED!

Commenter1:Nic Callero

Comment Excerpt Text:

The three values I hope the BLM prioritizes when revising this Resources Management Plan based on my personal explorations throughout the district include: Outdoor recreation, backcountry hunting, and the value of large connected unspolied habitat that offers visitors endless opportunities for solitude. It is often hard to place a monetary value on these resources but I hope BLM properly prioritizes opportunities as part of your multiple use mandate.

Organization1:SPOT

Commenter1:Donna Rhoads

Comment Excerpt Text:

[I believe we should form a committee of trail user partners, including equestrians, fishermen and hunters.] Once the areas of use are identified by the committee of users, additional recreational opportunities could be explored.

Commenter1:Susan Lomenick

Comment Excerpt Text:

I appreciate a balance between development (i.e. access on a mountain dirt road to Shelf Rd. climbing) and wilderness (the beautiful scenery). Specifically, I enjoy the fact that Shelf Rd is accessable but also remote. I that we should add some restrooms and some campsites and matintain some restrooms and it whould be designated as a recreatioal area. But to keep it recreational and enjoyable, we need to limit the development around it-i.e. no paved roads to mining/logging/drilling. Ares should be managed as a RMA

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW requests that flexibility be maintained to manage the Arkansas Headwaters Recreation Area (AHRA) according to CPW management plans and objectives, and that the ECRMP or the Brown's Canyon National Monument Plan do not contradict, supersede, or impede CPW's AHRA management objectives. There is already collaboration underway between CPW, BLM, and USFS to develop the monument plan

- incorporating important aspects of the AHRA. This should be a very productive way to ensure the AHRA and monument plan work well together, and the ECRMP should incorporate that.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Protection of existing CPW Managed Shooting Ranges (Chaffee County and Fairplay State Administrative Areas) and Federal support for future recreational shooting opportunities within the boundaries of the ECRMP. In general, CPW is in favor of maintaining existing shooting ranges (ie: limit closure of existing ranges, and expanding public shooting opportunities). The plan should offer protection for recreational shooting opportunities not only on existing shooting ranges, but at other locations on BLM lands unless there is a substantial reason for closing shooting in any specific area.

Commenter1:Dawn Klco

Comment Excerpt Text:

I feel that more recreational/established camping grounds are needed. There is very limited camping between Salida and Canon City which encourages many people to camp near the river, thus polluting and destroying the river banks and surrounding territory. If there is any way that the BLM can help with this effort, it would be much appreciated.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Include the Sportsmen Backcountry Conservation Area (BCA) in the RMP alternatives. Within the Royal Gorge resource planning area are several backcountry areas that have been identified by a group of stakeholders as important intact and undeveloped fish and wildlife habitat and hunting and fishing landscapes. Called Backcountry Conservation Areas[3. Backcountry Conservation Area Proposal. Submitted to BLM by Teddy Roosevelt Conservation Partnership to the BLM through the Eastern Colorado RMP/EIS scoping process. July 2015.], these designated areas would provide safeguards for outdoor recreational experiences, minimize future landscape development while still allowing a balance of multiple uses, and provide the flexibility for a variety management options for the BLM. Also, we ask that you please consider nominations from the public, both for areas that should be allocated as BCAs and appropriate management prescriptions.

Organization1:Colorado Springs Utilities

Commenter1:Justin Zeisler

Comment Excerpt Text:

The Arkansas Headwaters Recreation Area ("AHRA") is a BLM and Colorado Parks & Wildlife collaborative that Utilities believes works well to protect recreational values while also protecting the river resource. It might be relevant to study and extend some of the elements of resource-conscious recreational values from the AHRA to the RMP.

Organization1:Interim Director, Government Affairs

Commenter1:Jeremy Fancher

Comment Excerpt Text:

BLM Lands Near Cañon City

IMBA has been engaged in a collaborative effort around the Gold Belt SRMA near Cañon City. We appreciate some of the concepts being proposed but feel there is substantial room for a more progressive approach to managing this area for its wealth of recreation opportunities.

Organization1:Interim Director, Government Affairs

Commenter1:Jeremy Fancher

Comment Excerpt Text:

IMBA's local Chapter, Lower Arkansas Mountain Bicycling Association (LAMBA) have identified several areas with exceptional existing experiences as well as a few areas they believe hold opportunity to create new experiences that meet trail users desires.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

Capacity limits should be considered in the planning processes.

Commenter1:Heike Momiyama

Comment Excerpt Text:

d. 1¬74: "Partnerships will be developed with local or regional offhighway vehicle clubs/groups to assist in coordinating and enhancing offhighway vehicle recreational opportunities". Will partnerships be developed with other parties that would want to influence the use of the BLM land? Motorized and nonmotorized used do not typically mix well from a safety as well as common interest perspective. OHV clubs/groups may have very different priorities to potentially larger population of nonOHV users.

Commenter1:Heike Momiyama

Comment Excerpt Text:

OffHighway Vehicle use – (Let me start by saying that I have in the past been an OHV owner). I have read the Royal Gorge RMP (1996) as I understand the new RMP will replace this. It raises some questions/concerns in my mind. I will refer to Decisions from Arkansas River Subregion #1:

a. 1¬68: "....use will be managed through limitations or closures to protect values; responsible use will be encouraged throughout this sub¬region where use is allowed." This makes clear that values are to be protected however responsible use will be "encouraged". This implies that responsible use is voluntary and there is no expectation of enforcement of regulation whether this be regulations relating to the vehicle, rider responsibilities or even staying on the allowed trails. This language and intent is not strong enough to protect the lands and the use/enjoyment by wildlife and nonmotorized users.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

The RMP must consider, and we fully support, temporary seasonal closures being applied to all routes in areas ranked as Very High Priority Habitat by the Colorado Division of Wildlife in 2008. This includes areas such as big game winter concentration and production areas, Boreal Toad breeding sites, habitat for rare, threatened and endangered species etc.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

a significant amount of dispersed motorized camping occurs on BLM land directly across from the designated Railroad Bridge Campground. The BLM should consider a policy that prohibits dispersed camping within one half mile of designated campground to concentrate camping into areas where it can be managed.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Where a significant amount of dispersed camping is occurring in a general area, the BLM should consider developing a designated campground facility. The BLM lands below Mt Shavano would benefit from such a facility.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We generally support designation of ERMAs for quiet-use recreation experiences. ERMAs are to be less intensively managed and thus provide a primitive experience in a backcountry setting. ERMAs are also be definition commensurate with management of other resources, such as lands with wilderness characteristics, ACECs and other areas being managed for conservation values. Moreover, the management toolbox offered by those resources and designations complements management of quiet-use recreation opportunities. We therefore recommend BLM designate ERMAs for non-motorized recreation that overlap with other specially managed areas.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In the Eastern Colorado RMP we encourage BLM to use SRMAs to reverse ongoing downslide of quiet recreation settings by preserving and restoring opportunities in the primitive and backcountry areas–providing a prescriptive approach to creating, enhancing and protecting quiet recreation experiences on our public lands.

Areas that have primitive character should be managed for that experience and desired future condition, even if they do not currently meet all of the criteria that the BLM has set for primitive physical settings or designation. By adopting such a prescriptive, or aspirational management approach, as opposed to a more descriptive or reactive approach of just basing the management of

the RMAs on perceived evidence of human presence or an acceptance of more people wanting to use the area, BLM can ensure that some level of existing disturbance does not disqualify areas which do provide a primitive experience from a decision to manage them to protect and enhance such qualities and provide this important experience.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In designating RMAs that include quiet recreation objectives alongside other recreation activities, we recommend BLM consider Recreation Management Zones to protect quiet and non-motorized recreation. RMZs provide a useful management tool to manage recreation resources in complex situations. When making divisions, each RMZ should have discrete objective and provide for specific recreation opportunities.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should designate ERMAs and SRMAs for non-motorized recreation that overlap with other specially managed areas such as lands with wilderness characteristics. In places with high recreation demand for a variety of activities, BLM should develop Recreation Management Zones. The RMP must put in place robust management prescriptions for SRMAs and ERMAs to protect and promote the recreation opportunities they are designated for.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

BLM should ensure a positive future for our sporting traditions through a robust plan that properly addresses fish and wildlife habitat conservation and outdoor recreation.

Organization1:GPAA/Public Lands for the People

Commenter1:Garry Vaughn

Comment Excerpt Text:

Recreation- Access blockages/Travel markers

Organization1:Concerned prospectors

Commenter1:gary mason

Comment Excerpt Text:

1. There exists both a local and nation-wide interest in the persuit of alluvial prospecting within the Arkansas River Corridor and watershed, especially Cache Creek. These folks, many of which are done as family outings, some from out-of -state, regard placer mining as legal and popular recreation. This recreation is subect to many necessary rules and restrictions and is under pressure from orther user groups to cease or further restrict mining operations, as such. We have seen this happen locally with the withdrawl of Brown's Canyon N. P. from mineral extraction. Some families and others, are known to supplement their income as a result of placer or lode mining. There are but a finite number of areas within which prospectors can enjoy this hobby. A minority of recreational prospectors have the resources to afford to join such organizations as the Gold Prospectors of CO or Gold Prospectors of America thus not having a formalized group to represent their interests. Consquently, I and others so interested, believe that this group of users be given an equal opportunity for inclusion within the new BLM Eastern CO RMP as legitimate and somewhat voiceless user group. Many of this user group cannot hike into some obscure back-country site to enjoy this particular hobby.

B.1.18.2. Recreation and Visitor Services - Baseline Affected Environment

Total Number of Comments: 13

Summary

The BLM should restrict camping to certain areas to protect resources and user experiences. Likewise, nonmotorized settings and quiet recreation opportunities should be preserved. The BLM should balance recreation and the historic and physical values of the land. The BLM should protect state parks and other recreation areas overlying federal mineral estate from energy or minerals development.

There should be a focus on improved facilities in developed recreation areas.

The BLM should use geospatial data on recreation trends and locations to focus management in appropriate areas. The BLM should work with other land use agencies, school districts, colleges, and universities to provide educational experiences and to facilitate research.

The Gold Belt region and Red Canyon are important areas for rock climbing. The Arkansas River is an important resource for water-based recreation.

See Section 2.3.1.16, Recreation and Visitor Services (p. 26)

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

5) a) I would encourage BLM to close all camping (designated and at large) that is within 200ft of waterways and riparian areas. Yes, there are still camping areas next to the water!

Commenter1:Michael Smilie

Comment Excerpt Text:

while also supporting recreational opportunities that do not require the addition of special use designations unless they are limited to small plots with significant historical or physical attributes. While I recognize the increased economic impacts of recreation I think users need to recognize the historical uses of the area are equally if not significantly more important to the nation and the region

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW's preliminary review of the Federal mineral estate for the ECRMP revision in relation to priority CPW management properties and interests indicates intersects with State Wildlife Areas, State Habitat Areas, Shooting Ranges (SAA), Poudre River State Fish Unit (Fishing Access), Colorado State Parks, and Colorado Natural Areas (see Appendix B). CPW also anticipates numerous intersects with conservation easements, and state trust lands that provide access for hunting/fishing/outdoor recreation.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Colorado State Parks provide recreational opportunities for over 12 million people each year; and the combined visitation for the 16 state parks intersected by the Federal mineral estate for ECRMP is 6 million per year. The parks are a great resource to get people outdoors and they preserve and protect various habitats which are used to teach people about the environment. Energy or minerals development on or near the surface of these properties would be inconsistent with the purpose they were purchased.

Commenter1:Brenda Wiard

Comment Excerpt Text:

Some of the areas near Salida and elsewhere could use better parking areas for those driving to access the trails. By “better” I mean, more parking areas, larger parking areas, and maybe even a bathroom at the most used areas. Remember, once the Browns Canyon National Monument starts to draw more people, our area will get even heavier use.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Virtually all lands administered by the BLM in Park County occur south of Kenosha Pass and west of Wilkerson Pass. Exceptions include small (BLM) parcels scattered throughout the southeast corner of the county, including a small area along West Fourmile Creek known as “Guffey Gorge.”

-Compared to national forest lands, state parks and state wildlife areas, relatively little outdoor recreation occurs on BLM lands in Park County. The vast majority of BLM lands are leased for

grazing with limited public access. However, some BLM holdings are now experiencing heavy summer recreational use while others provide a visual backdrop for recreation opportunities on adjacent (public) lands. Moreover, private dude ranches and guest lodges may, to some extent, rely on BLM lands for their livelihood (i.e. horseback riding).

-Along with Reinecker Ridge (see below), the largest concentration of BLM land in Park County occurs along the Park-Fremont County line south and west of Guffey. While this remote area is used for hunting, target shooting and off-highway vehicles, the level of public

use is minimal compared to other BLM lands in the region, such as the Arkansas River SRMA

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

GIS analyses indicate that BLM lands extending from Mosquito Peak south to Mount Sherman (including Mosquito Pass) are of greatest concern from a recreation management standpoint. This area receives very heavy summer use by multiple recreational groups but is lacking public facilities and effective management. Other areas of increasing (recreation management) concern include BLM lands around Reinecker Ridge, Red Hill Pass, Guffey Gorge, and Sheep Creek Road.

Commenter1:Jessica Monson

Comment Excerpt Text:

Expanded Reach. The Leadville Race Series brings endurance athletes from across the world, along with their family and friends, to Leadville to experience the beautiful and unique terrain.

Commenter1:Jessica Monson

Comment Excerpt Text:

Zero-Waste Policy. All races operated as a part of the Leadville Race Series are Zero Waste events. Recycling and compost bins are available at every aid station as well as at the start and finish lines, and intentional littering on the course is grounds for disqualification. The course—on trails both public and private—travels past many historic sites and through areas of exceptional beauty. Life Time recycles all plastic, aluminum and cardboard during all events, and sends a clean-up crew through the trails after each event to ensure zero waste is left behind.

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

Geospatial Data to Inform Planning

From a recreation perspective, capturing information on recreational resources, spatially and experientially—not simply programmatically—is important because of the strong attachment formed by outdoor recreationists to highly specific places and the experiences they support. These experiences provide myriad benefits to the individuals who value them, as well as to local communities, which benefit economically from proximity to these resources. It is difficult,

if not impossible, to develop sound Desired Outcomes and Allowable Uses for the planning area without a strong understanding of the places recreational users visit on BLM lands and the activities they pursue in those places. Further, developing strong data on places of recreational significance and the experiences they support will help to more narrowly define disputes and controversies, leading to a more efficient dispute resolution and planning process.

Outdoor Alliance has assembled a geospatial database of human-powered recreation resources to demonstrate where users are recreating on public lands. The data is mostly crowdsourced through online mapping platforms such as MountainProject.com and MTBProject.com, AmericanWhitewater.org, as well as at mapping workshops hosted by OAC and partner groups. We are pleased to present the attached regional map of eastern Colorado which displays mountain biking, rock climbing and paddling resources associated with the ECRMP (data includes climbing resources that are within BLM lands and mountain biking and paddling resources that are within two miles of BLM lands to accommodate trails and rivers that pass through BLM lands) and illustrates the importance of eastern Colorado BLM lands to the climbing, mountain biking and paddling communities. We are also pleased to submit this data in ArcGIS geodatabase format (.gdb, WGS1984) for BLM use throughout the ECRMP process.

Please contact Erik Murdock at erik@accessfund.org with any specific questions regarding the recreation resource data.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

The 2007 Rec Strategy describes the potential for downshifts in primitive recreation settings due to recreation demand, and in some cases tourismdriven demand ("tourism industry promotion") pages 6 and 7) in places like Deer Haven, Booger Red Hill and the Gulches that are being discussed for mountain bike trails. All have the potential to lose their current remote, solitary social settings due to unmanaged mountain bike use.

Especially with inadequate BLM recreational budgets, unplanned growth of mountain bike use on both designated and social trails will make it difficult to prevent unplanned downshifts in the RSC

(Recreation Setting Characteristics Matrix) social settings Primitive to less Primitive (Backcountry and Middle Country Classifications).

Commenter1:Carol Stansfield

Comment Excerpt Text:

I especially value public lands as living classrooms for elementary and high school students, and as living laboratories for college students and scientists conducting geological, biological, climatic, and ecological research. One example is School in the Woods, a public school in Colorado Springs which uses 640 acres of Colorado state land as a forest classroom for fourth graders. Opportunities for young people to learn from the land, and for scientists to conduct research in living ecosystems are invaluable uses of our BLM lands. I encourage the BLM to actively work with other land-use agencies, school districts, colleges and universities to provide educational experiences and to facilitate research.

Commenter1:Cathy Besmar

Comment Excerpt Text:

The gold belt region and red canyon provide excellent rock climbing experiences in a natural setting

B.1.18.3. Recreation and Visitor Services - Impacts

Total Number of Comments: 8

Summary

The EIS should analyze and consider several issues, including the economic impacts of recreation, outfitters, and guides; impacts of OHV recreation on other recreation activities; impacts on nonmotorized recreation opportunities; and impacts of oil and gas development on recreation.

See Section 2.3.1.16, Recreation and Visitor Services (p. 26)

Commenter1:Janis Frazee

Comment Excerpt Text:

People rafting the Arkansas, the tourists who come are coming to see the surrounding area as wild, if its developed for mining, oil and gas development, it will not be as visually appealing for recreation, whether it's Coloradans or out of state visitors.

Commenter1:Connie Pace

Comment Excerpt Text:

We can no longer use the area due to overuse by motorized vehicles. Even some ATV and dirtbike owners dont go there anymore since it's too crowded for them too! The (?) is another place we can no longer use either due to motorized vehicle overuse there too.

Commenter1:Mary Gilkison

Comment Excerpt Text:

I really appreciate that there is no motorized use allowed on Reinecker Ridge. This is most important for the wildlife in the area, and secondarily, to me as a quiet recreation user. It would be an abomination to allow motorized recreational opportunities (OHVs, etc) or oil and gas drilling operations in area so close to a wildlife refuge area.

Commenter1:Elaine Scallan

Comment Excerpt Text:

I am concerned that BLM lands in the Buena Vista area cannot support additional offhighway vehicle use. There are two areas near my property, used by offhighway vehicles, that have been designated “reclamation areas”— Sevenmile creek and Fourmile Creek. Offhighway vehicles have caused a loss of vegetation, degraded wildlife habitat, and caused severe erosion. I am deeply concerned that other areas may suffer the same faith if opened up to offhighway

vehicles. I hope that any expansion of trails, OHV or otherwise, will be accompanied by detailed environmental impact assessments.

Commenter1:Misi Ballard

Comment Excerpt Text:

and to protect these lands from unmanaged motorized activity and potential oil and gas development.

Commenter1:Douglas Walter

Comment Excerpt Text:

Moreover, allterrain vehicles are large and destructive. The land and flora and fauna are fragile and precious. Allterrain vehicles cause damage that would essentially last forever.

Commenter1:Heike Momiyama

Comment Excerpt Text:

h. Another issue which is not covered is the destruction of terrain resulting from OHV use. This is particularly the case where enforcement may not be occurring. For example, going “donuts” and going off trail will damage the trails and surrounding areas.

Commenter1:John O'Toole

Comment Excerpt Text:

As part of providing opportunities for quiet recreation, BLM must consider activities that interfere with the soundscape associated with quiet recreation opportunities. Research shows that for many people, especially quiet recreationist, the primary reason for visiting primitive landscapes is to attain a sense of solitude and tranquility, which are interrupted by nonnatural noises. A study performed by psychologists at Colorado State University found that acoustic stressors impact visual landscape quality, meaning nonnatural noise actually affects the perceived naturalness of a landscape (Mace 1999).

B.1.18.4. Recreation and Visitor Services - Mitigation Measures

Total Number of Comments: 2

Summary

The BLM should analyze the impacts of recreation activities (e.g., target shooting, OHV travel, and camping) and develop specific mitigation measures to minimize those impacts.

See Section 2.3.1.16, Recreation and Visitor Services (p. 26)

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

7) Camping/Sanitation

As a volunteer monitoring in the Fourmile trail management area for the last 13 years. I have seen significant damage from at large camping

a) The public is using larger camping vehicles. Lack of education has the public camping on native vegetation instead of eroded ground.

b) the public has no sanitation facilities available in the area.

c) The public is poorly education on public land proper use!

I would therefore like the BLM to consider only designated camping on all BLM Lands and require a portable toilet system by all users. I realize that this would require a big education factor

Commenter1:345263

Comment Excerpt Text:

Recreation that causes noticable damage (such as trash, destroyed trees and other natural resources, shells left behind from target practise), or trails that are damaged by heavy OVH use, should be be closely monitored and mitigated

B.1.18.5. Recreation and Visitor Services - Nominations

Total Number of Comments: 22

Summary

In general, the BLM should designate a suite of Recreation Management Areas for nonmotorized recreation. Backcountry Conservation Areas should be designated for similar purposes. Recreation Management Zones should be designated where needed. Areas deserving of Special Recreation Management Area (SRMA) designation include the Gold Belt SRMA and Red Canyon SRMA (with Recreation Management Zones). Management of the Gold Belt SRMA should be updated to reflect current trends and conditions. Areas deserving of Extensive Recreation Management Area designation include Crampton Mountain, Stanley Creek, Upper Arkansas, Booger Red Hill, the Gulches, Deer Haven, and Twin Mountain. The Shelf Road RMA should be designated to support rock climbing. The Gorge should be managed for hikers, campers, and sportsmen.

See Section 2.3.1.16, Recreation and Visitor Services (p. 26)

Commenter1:Karl Ford

Comment Excerpt Text:

Red Canyon RMA Nomination

The Red Canyon area is located 5 miles from downtown Canon City, CO and stretches north along County Road 9 toward Red Mountain just west of Cripple Creek. The 33,759 acre area offers a variety of dispersed recreation opportunities,many miles of designated trails and opportunities to explore a unique array of natural ecosystems in Southern Colorado. It is easily accessible to users from the local communities of Canon City and Cripple Creek, as well as visitors from Colorado's urban Front Range (approx. 50 miles) and beyond. Recreation has been increasing in the area to include Rock Climbing at Shelf Road, Mountain Biking at Oilwell Flats, hiking in Garden Park,

and more. The area provides visitors an opportunity to explore a variety of landscapes from grasslands, deciduous forests, cacti, sagebrush, and sunflowers.

The area also includes a number of ecological resources including rare plants, sensitive wildlife habitat (including critical habitat for the CPW endangered Mexican Spotted Owl), visual resources, and notable geography. Sustainable management of the area requires a balance between recreation demands and natural resource protection. Through the Red Canyon SRMA designation, the BLM will be able to proactively manage the unique recreation opportunities while preserving the natural beauty and health of surrounding ecosystems. Objective Statement: The Red Canyon SRMA will offer primitive, backcountry and middle country recreation opportunities for a variety of users.

The Red Canon SRMA will include four zones with a specific recreation focus: Oilwell Flats (Mountain Biking), Garden Park (Hiking), Shelf Road (Climbing) and Booger Red Hill (Primitive Recreation). Activities by zone are:

1. Booger/Red Hill RMZ: Hiking, Backpacking, Horseback Riding, Camping, Fly Fishing, Bird Watching, Wildlife Viewing, Interpretive Education

2. Oil Flats RMZ: Mountain Biking, Commercial Recreation (Biking)

3. Shelf Road RMZ: Rock Climbing, Camping, Commercial Recreation (Climbing)

4. Garden Park ACEC RMZ: Interpretive Education

Commenter1:Karl Ford

Comment Excerpt Text:

Thompson to Crampton Mountain Extensive Recreation Management Area (ERMA)

ERMAs are administrative units that require specific management consideration in order to address recreation use, demand, or Recreation and Visitor Services (R&VS) program investments. ERMAs are managed to support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA. ERMA management is commensurate and considered in context with the management of other resources and resource uses.

SUPPORTING INFORMATION

The Thompson Mountain, Crampton Mountain area is located about 13 miles northwest of Canon City, CO, and straddles Highway 9 about 6 miles north of US Highway 50. The approximately 19,900 acre area offers dispersed recreational opportunities, including designated horse, hike, and bike trails, and outstanding backcountry values such as big game and turkey hunting. The area gives visitors an opportunity to explore a range of landscapes and ecosystems, from rocky pinyon-juniper scrubland, to mixed forests, montane grasslands, and riparian drainages.

This area also includes a number of important ecological resources, including an imperiled natural community of narrowleaf cottonwood, Rocky Mountain juniper woodlands, an important natural riparian community of narrowleaf cottonwood and coyote willow woodlands, and the imperiled and endemic species, the Arkansas Canyon Stickleaf.

This area provides high range and habitat value for many species, including potential habitat for the endangered species, Canadian lynx; overall range for the Colorado state critically

imperiled species, Brazilian free-tailed bat; overall range for the Colorado BLM sensitive species, Gunnison's prairie dog. This area also provides proposed critical habitat for the endangered species, Mexican spotted owl, and overall range for the scaled quail, a Partnership in Flight priority bird and species of most concern.

Through the Thompson to Crampton ERMA, the BLM will be able to manage for these outstanding recreational opportunities while preserving the natural integrity of the surrounding ecosystems, plant communities, and species' range and habitat.

ERMA OBJECTIVES

Objective Statement: The Thompson to Crampton Mountain ERMA will offer primitive and backcountry recreation

opportunities, in a relatively unchanged physical recreation setting, that facilitate the visitors' freedom to participate in a variety of dispersed, non-motorized recreation activities.

Commenter1:Karl Ford

Comment Excerpt Text:

Stanley Creek Extensive Recreation Management Area (ERMA)

Important values: The Stanley Creek ERMA comprises of parcels on the periphery of the Sangre de Cristo Wilderness and San Isabel National Forest. The primary resource values associated with this land is that it provides corresponding activities and access gateways with nearby Forest Service and Wilderness lands. The area contains a trail-based recreation system. There is a significant amount of non-motorized recreation opportunities in the area. Visitors comprise both local residents of Huerfano County and visitors from outside the region, seeking day and overnight experiences after work and on weekends. Visitors seeking unique back country opportunities within adjacent federal lands access public lands through this area. BLM-administered lands (public lands) on the periphery of the San Isabel National Forest provide settings for a variety of recreational opportunities, including:

- Connecting to outdoor recreation close to home

- Connecting to trail systems on adjacent jurisdictions (including federal, state, local, and private)

- Hunting and fishing (adjacent to San Isabel National Forest and Huerfano State Wildlife Area)

- Travel in the Sangre de Cristo Mountains, including

● Hiking

● Dog Walking

● Horseback Riding

- Viewing largely undeveloped scenic views, including panoramas of the Sangre de Cristo mountain range

- Wildlife viewing opportunities

ERMA Objective Decisions

Objective Statement:

Maintain a variety of dispersed and non-motorized recreation opportunities that facilitate visitor freedom to access a range of outdoor recreation activities associated with a natural landscape with limited developments. Protect scenic and backcountry values for multiple recreation opportunities in Wilderness Areas, lands with wilderness characteristics, State Wildlife Areas, Forests, and State Land Trust areas. Activities: Filming and photography, geocaching, hiking, horseback riding, viewing natural settings, viewing wildlife/birdwatching, viewing cultural sites/historic touring.

Experiences: participating in exercise/physical activity, enjoying closeness with friends/family, releasing/reducing mental tension, escaping everyday responsibilities.

Management Actions and Allowable Use:

Recreation and Visitor Services Program:

- Coordinate with other federal, state, county, and local agencies to identify and develop recreational trails for dispersed recreation as needed
- Provide connectivity to surrounding access routes and trail systems
- Monitor recreation use along trails. Close/rehabilitate authorized routes as needed
- Install visitor interpretation signs at trailheads and in areas of potential user conflict or resource impact

Other programs:

- Travel: Limit use to non-motorized; The Stanley Creek SRMA would remain closed to motorized use
- OHV: closed to OHV use
- Lands and Realty: Close area to ROWs
- Leasable Fluid Minerals: The Stanley Creek ERMA would be closed to fluid mineral leasing.
- Locatable Minerals: Recommend withdrawal from locatable mineral entry
- Historic Sites: The BLM would manage historical structures for maximization of the interpretive and educational potential of the sites, while protecting their inherent cultural values

Commenter1:Kris Godwin

Comment Excerpt Text:

The shelf road climbing area and surrounding wilderness is important to me because it is an area where I congregate with friends and camp and climb, It's proximity to Colorado springs is important as we can use it as a weekend getaway and feel like we are in a climbing paradise. I personally know many people who would be directly affected should this land be developed and I strongly feel as though it should remain as it is now.

I would like to see this area designated RMA (recreational management area). I truely beieve that this would be the best practive given the areas already high level of recreational activity.

Commenter1:Kris Godwin

Comment Excerpt Text:

The shelf road area is an important recreational area for Southern Colorado. It has a number of climbing routes for beginners and advanced climbers. The presences of an oil rig or mining operation would be (?) from this beautiful area. Additionally, using this area as an acres point for areas would disturb recrational users. My Friend and I use this area and would be very disappointed if the area was developed.

I would like to see this area designated by a recreational management area (with additional campsites).

Commenter1:Suz Leonard

Comment Excerpt Text:

It provides an area for recreation for groups and individuals. These recreations include sport climbing, camping, and hiking. It provides a close place to go and experience all these activities.

I would like to see the Shelf Road managed as an RMA with the continued opportunity to expand bolted climbing routes and hiking.

Commenter1:Robert Lomenick

Comment Excerpt Text:

It was known to me that the Shelf Road was a world class area for sport rock climbing. When making my decision where to move. But, it is more than just antoher rock climbing area. The above mentioned areas provide climbing, but are in major population center and do not provide the experience of a wilderness area. The beauty Shelf Road is that it provides both. I would greatly appreciate your consideration in designating the Shelf Road area.

A RMA. This will help ensure that this historically significant area will maintain its wilderness feel, while still allowing the folks to enjoy the experience.

Commenter1:Melissa Norman

Comment Excerpt Text:

Shelf is an area I would like protected as a RMA with no ATV/motorized recreation vehicle usage. It's proximity to Colorado Springs makes it a fantastic outdoor climbing area with a variety of routes for every skill level. It is easily accessible from COS while remaining undeveloped without paved roads and heavy traffic. The natural unaltered terrain and wildlife make it a wonderful area to experience solitude in nature, camping, backpacking, and hiking the that I'd like to see maintained and expanded for future generations. I would also like for shelf to be able to be expanded in the future with new bolted climbing routes. The upper Red canyon should also be protected as an LWC to maintain the natural environment and beauty experienced while at Shelf. There are velnerable species in the Upper Red Canyon that need protection such as the Fendler cloak fern, Gunnison prairie dog, and big horn sheep. While I would prefer not to meet a bear while climbing, I would like their habitat protected.

Commenter1:Lisa Simmons

Comment Excerpt Text:

Shelf Road and surrounding area is a refuge for climbers and campers. Its locaiton is ideal; being such a short drive from Colorado Springs. It allows for solitude and a feeling of escaping the city. The primitive feeling of taking a dirt road out to such a superb location is wonderful. The climbing at Shelf Road is top knotch. It is a wide range of climbs that appeals to all climbing levels. There are very few locations similar to this throughout the US. We have a unique recreation area the is highly used by outdoor enthusiasts. The low amount of people who do frequent shelf appriacte the close proximity of the campground for a multi-day climbing trip.

RMA- to allow for access for climbing and camping without restiction of the area.

Commenter1:Scott Simmons

Comment Excerpt Text:

I believe Shelf Road and the surrounding area should be managed as a recreatioanl area. To me this means the area surrounding it, the views from there, and the access to there. Shelf has been an established climbing area for a while now and a lot of work has been put into that area. I have lived in Colo. Springs for 21 years and have climbed there a lot. It is an area that people travel from all over the nation to climb at. It's quality and (?) make it an amazing place. Please leave it, and the areas surrounding it focused on climbing.

I would like to see it managed as a recreational area. Shelf road is great the way it is. Pleas leave the area available for climbing experiences

Commenter1:Michaela Weber

Comment Excerpt Text:

1) My uncle is a fly fisherman. It is his main profession and the Arkansas River is the site for most of his guided trips. Conserving the area would also conserve the aesthetic part of his job.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

Gold Belt SRMA: CMC has worked closely with Outdoor Alliance Colorado groups and conservation advocates to craft an SRMA proposal that encompasses roughly 30,000 acres of BLM lands between the towns of Cañon City and Cripple Creek. The eastern boundary follows land ownership boundaries and borders the Cooper Mountain area. The northern boundary extends up to the largely primitive area near Cripple Creek, while the southern boundary is in close proximity to Cañon City. The area offers tremendous recreation opportunities for camping, hiking and trail running on single-track trails, mountain biking, rock climbing, discovering and learning about the area's natural and cultural history, and exploring primitive undeveloped canyon country on foot or horseback. This area includes well-known recreation destinations including the

Gold Belt Scenic Byway, Shelf Road, Red Canyon, Oil Well Flats, and Garden Park. The area has scenic views of Cooper Mountain, Red Canyon, and Lower Four Mile Creek.

The Gold Belt SRMA is in close proximity to Cañon City, which makes it an important community resource for local recreation and quality of life, economic diversification, and tourism. There are opportunities to enjoy backcountry solitude in the Booger/Red Hill areas, while the Shelf Road and Oilwell Flats zones are well suited for more intense human-powered recreation and camping. The goal of the SRMA is to develop comprehensive management strategies that create sustainable recreation opportunities in balance with the surrounding natural resources. We urge you to accommodate higher use in the front country zones, while protecting primitive and remote areas from new trail/facility development and expanded use. Recreational shooting should remain closed in the majority of recreation area to protect user safety and quiet recreation experiences. Motorized travel should also remain restricted to the designated routes delineated in the current TMP. Complete maps, zone boundaries, and management recommendations will be submitted in August.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

Stanley Creek ERMA: This area, located south of Gardner, this area sits on the periphery of the Sangre de Cristo Wilderness and San Isabel National Forest. The area contains a trail-based recreation system with a significant amount of non-motorized recreation opportunities. This ERMA should help maintain a variety of dispersed and non-motorized recreation opportunities that facilitate visitor freedom to access a range of outdoor recreation activities associated with a natural landscape with limited developments. The ERMA will protect scenic and backcountry values for multiple recreation opportunities in Wilderness Areas, lands with wilderness characteristics, State Wildlife Areas, Forests, and State Land Trust areas. The Wilderness Society has submitted a full proposal for the Stanley Creek ERMA.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

Upper Arkansas ERMA. This area extends along the banks of the Arkansas River from Salida to Leadville and includes easily accessible recreation opportunities for hiking, fishing, mountain biking, whitewater paddling, wildlife viewing and more. There are several developed trail systems and an expanse of primitive and remote areas that should remain restricted from motorized trail development, mineral development, and other disturbances. The Wilderness Society has submitted a full proposal for the Upper Arkansas ERMA.

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

Special Interest Areas

While we urge the BLM to consider protecting and enhancing recreation opportunities throughout the planning area, there are areas and zones that have high concentrations of human-powered recreation and deserve a higher level of analysis in the planning process. Lake, Chaffee, Fremont and Teller counties and the communities of Buena Vista, Salida, Leadville and Cañon City offer land and water based recreation amenities valued by both the local communities and destination travelers. Hiking, climbing, mountain biking and paddling are important not only to the economies of these areas, but also are a significant contributor the quality of life of the areas' residents. Protecting both current and future recreation opportunities in these areas should be a high propriety for the ECRMP and working with local organizations including Ark Valley Velo, Salida Mountain Trails, the Pikes Peak Climbers Alliance, the Cloud City Wheelers and others will be essential throughout that process.

Many recreation areas being evaluated in the ECRMP deserve the protection provided by a Special Recreation Management Area (SRMA) designation, and we would like to highlight the Gold Belt SRMA, encompassing roughly 30,000 acres of BLM lands between the towns of Cañon City and Cripple Creek. OAC and conservation advocates are currently working to craft a SRMA proposal for this area and develop comprehensive management strategies that create sustainable recreation opportunities in balance with the surrounding natural resources. The eastern boundary of the Gold Belt SRMA follows land ownership boundaries and borders the Cooper Mountain area. The northern boundary extends up to the largely primitive area near Cripple Creek, while the southern boundary is in close proximity to Cañon City.

The area offers tremendous recreation opportunities for camping, hiking and trail running on single-track trails, mountain biking, rock climbing, discovering and learning about the area's natural and cultural history, and exploring primitive undeveloped canyon country. This area includes well-known recreation destinations including the Gold Belt Scenic Byway, Shelf Road, Red Canyon, Oil Well Flats, and Garden Park. The area has scenic views of Cooper Mountain, Red Canyon, and Lower Four Mile Creek. The Gold Belt SRMA is in close proximity to Cañon City, which makes it an important community resource for local recreation and quality of life, economic diversification, and tourism.

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

In partnership with the Backcountry Snowsports Initiative, OAC has identified several areas on BLM land west of Leadville as high-value backcountry skiing terrain (detailed descriptions and maps are included in the Colorado Mountain Club's scoping comments- see attached). The BLM should consider additional analysis of winter recreation use on lands within the ECRMP in order to determine other areas where user conflict or natural resources warrant additional management of over-snow vehicle use.

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

Watersports are a key recreation asset and economic driver throughout much of the planning area and especially along the upper stretch of the Arkansas River between Leadville and Canon City. The river offers a variety of challenging boating opportunities for rafters, kayakers and standup paddle board enthusiasts, as well as mellow stretches for tubing and family-friendly recreation. The joint management of land along much of the river corridor is a great collaborative model between the BLM and Colorado Parks and Wildlife which helps to ensure safe access to and responsible stewardship of this incredible recreation asset. With many competing demands for water and resources, we encourage the BLM to consider designations that protect the recreational opportunities along waterways throughout the planning area.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

PROTECTING WILDLIFE THROUGH ERMA DESIGNATION

However, if it is determined that the four subunits are to be designated as RMAs, an alternative, much less certain way to protect these core habitat blocks is to designate them as ERMAs, managed to maintain RSC Class 1 primitive settings.

To do this, however, the RMP needs to demonstrate why recreation of any kind is a higher use for these subunits than wildlife protection. Before irreversibly converting primitive wildlife habitat areas such as these to either ERMAs or SRMAs, the Land Use Regs state that the BLM must explain why each contains ‘unique value, importance and distinctiveness for recreation,” as compared with other

values such a¬¬¬as documented above¬¬¬aquatic resources and wildlife values. Before proceeding with RMA status, the BLM needs to demonstrate why core areas that are currently essential for increasingly displaced wildlife and that have little recreational use should be converted to potentially high traffic trails.

While the Land Use Regs focus mostly on SRMAs in their discussion of ‘Goals, Objectives and Management,’ the regs also allow ERMAs to be assigned Goals, Objectives and Management guidance.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

The outline below follows the Land Use Regs:

Land Use Regs; 2. (a) Requirements Establish primitive ERMAs for Booger Red Hill, the Gulches, Deer Haven and Twin Mountain, to conserve unfragmented core habitat and primitive settings within VS & R Program as follows:

ERMA Management Focus

· Recreation use is compatible with the interdisciplinary land use plan objectives, including objectives for wildlife and effective habitat

· Recreation is managed commensurately with wildlife and other resources

· Recreation is manage to maintain Primitive Classification I as found in the RSC matrix (Recreation Settings Characteristics Matrix) of physical, social, and operational components. This RSC setting, with its low encounters and group sizes, is the only setting fully compatible with habitat effectiveness (unfragmented, core habitat) in the face of mounting mountain bike pressures

NOTE: Goals, Objectives and Management for the ERMA would be written to minimize habitat fragmentation by trails (see suggested language below) by maintaining these subunits in their currently uncrowded, primitive settings most of these subunits currently have. Goals objective and management would be selected to maintain physical, social and managerial settings

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We are proposing two Extensive Recreation Management Areas with these scoping comments. Our full proposals with maps, descriptions of recreation values and management needs, and management prescriptions are enclosed in Appendix D. We have summarized our proposals below.

1. Stanley Creek ERMA. The Stanley Creek area is one of the largest parcels of BLM land in Huerfano County. Its location is uniquely situated next to the Sangre de Cristo Wilderness and San Isabel National Forest as well as Colorado State Wildlife Areas. BLM should provide management direction that supports quiet and nonmotorized recreation in conjunction with these adjacent federal and state lands. The Stanley Creek ERMA nomination provides recommendations for BLM to manage recreation in the area in a way that is consistent with adjacent lands and resource protection needs.

2. Thompson to Crampton Mountain ERMA. The Thompson to Crampton Mountain ERMA includes Deer Haven and Crampton Mountain. The area receives recreation use for its backcountry experience, which should be retained throughout the life of the Eastern Colorado RMP. The Gold Belt TMP restricts OHV use in the area to protect backcountry recreation experiences. Likewise, the State land in the area disallows mechanized use due to resource protection needs. These considerations should inform BLM's management decisions for the area; particularly, the ERMA should provide adequate protections for quiet and non-motorized users.

Recommendations: BLM should fully consider the Stanley Creek and Thompson to Crampton Mountain ERMAs to meet recreation objectives and provide quiet recreation opportunities in the Eastern Colorado RMP.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

e. Additional Potential Recreation Management Areas

1. Red Canyon/Shelf Road/Oil Well Flats. BLM should consider designating a Special Recreation Management Area for the recreation complex encompassing Red Canyon, Shelf Road and Oil Well Flats. This area deserves special management to protect resources and values in the area. Nowhere else in the planning area is BLM faced with management decisions that affect a full range of recreation user types in a limited area, including (but not limited to) hikers, campers, climbers, bikers, and cultural and historical spectators. BLM has an opportunity here to designate a SRMA encompassing multiple Recreation Management Zones to manage intensive uses while also enhancing quiet and non-motorized use. This approach would limit user conflict and protecting resource values.

We encourage BLM to take a holistic approach to managing the multiple recreation opportunities in this complex. In designating this SRMA, BLM should create Recreation Management Zones that partition the area for backcountry recreation, mountain biking, and climbing, while putting in place special management attention for the Garden Park ACEC. This zoned approach not only reflects the current use and values of the area, but also would ensure that each of these user groups will be able to enjoy the opportunities and benefits of recreating in the area throughout the life of the plan. BLM has the opportunity to designate and manage an area that showcases and enhances multiple recreation opportunities and jointly protects the recreation setting conditions of Red Canyon, Shelf Road, and Oil Well Flats.

We are exploring a formal SRMA nomination for this area and will submit additional information to BLM in the near future.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Upper Arkansas Recreation Management Area. We strongly encourage BLM to consider an ERMA designation for the Upper Arkansas River corridor, including the parcels of public land between Salida and Leadville. The Upper Arkansas River corridor provides a variety of recreation opportunities, including water-based activities, hiking and biking, and motorized touring. While there are not large parcels of contiguous public lands in and around the corridor, the extraordinary recreation values and the ability of BLM to collaborate with other recreation efforts in the corridor make the Upper Arkansas River corridor a good candidate for Recreation Management Area designation.

The Arkansas River Stage and Rail Trail (S&RT) is a unique initiative to create a trail network that follows historic railways along the Arkansas River from Salida to Leadville. The S&RT is a project of the Greater Arkansas River Nature Association (GARNA), an important community voice and invaluable partner to land management agencies in the area. Project proponents released a Master Plan in April 2015 to planning partners, including Lake and Chaffee Counties, Towns of Salida and Buena Vista, AHRA, BLM and USFS. The partners are reviewing the Master Plan and will determine the appropriate path to adoption and implementation.

The S&RT follows, borders, and intersects a variety of land owners, including private, County, Forest Service, and BLM lands. The increased landscape connectivity for recreation in the S&RT has received significant support from local government and private business alike. The primary objective of this plan is the preservation of historic routes and physical features. BLM should consider ways to collaborate with the S&RT to promote recreation along the Upper Arkansas, including by designating an ERMA in the Eastern Colorado RMP that would lay the foundation for managing recreation use along the S&RT.

The Arkansas Headwaters Recreation Area is another opportunity for collaborative management of the Upper Arkansas that would benefit from ERMA designation in the Eastern Colorado RMP. AHRA is a unique effort between management agencies to support world-class recreation while also protecting resources that contribute to that experience. Likewise, areas surrounding Browns Canyon National Monument play an important role in the visitor experience. An ERMA designation provides the tools necessary to retain high-quality, natural settings for quiet recreation across the region's suite of public lands.

Recommendations: BLM should consider designating a Recreation Management Area for the Upper Arkansas River corridor to promote collaborative management of recreation experiences along the corridor with the S&RT, AHRA, Browns Canyon National Monument and other recreation efforts and opportunities.

B.1.19. Travel and Trails Management

Total Number of Comments: 1

Summary

The BLM should leverage partnerships to address travel management.

See Section 2.3.1.17, Travel and Trails Management (p. 26)

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

We [LTUA] would like to be included as a non-profit partner in river restoration and trail projects on BLM lands in our service area.

B.1.19.1. Travel and Trails Management - Alternatives

Total Number of Comments: 38

Summary

There should be improved facilities to support travel and access, and there should be greater access to BLM-administered lands overall.

The BLM should identify ROW acquisitions for improved public access.

OHV travel should be confined to small areas and away from lands with wilderness characteristics. OHV designations should preserve quiet recreation settings and riparian areas. The BLM should use emergency and temporary closures for OHV travel when necessary. Likewise, over-snow vehicle travel should be limited to appropriate areas. The BLM should use limit OHV travel to designated routes as an interim designation before the travel management plan is finished.

Certain areas should be managed as limited to designated routes for motorized travel, including those around Mosquito Pass, Guffey Gorge, Sheep Creek Road, Texas Creek, and Sand Gulch near Howard. The Reinecker Ridge area and the area extending south and east of Red Hill Pass should be designated as closed to motorized travel.

The BLM should develop route-designation criteria as part of this RMP revision. Examples include physical and social (e.g., user conflict) criteria. Set priorities (including specific areas) and sideboards for completing the future route-designation process. Follow examples from other BLM field offices.

The BLM should complete a baseline inventory map and differentiate routes that have been constructed or created since 1996. The BLM should share the baseline inventory map with the public in different electronic file formats.

See Section 2.3.1.17, Travel and Trails Management (p. 26)

Monitor and collect travel data. Make the data available to the public.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

Each Field Office plan should include travel access strategies with Right-Of-Way acquisitions as a priority.

Commenter1:Andrew Wright

Comment Excerpt Text:

BLM lands throughout Colorado offer little in the way of trails and recreation, and that needs to be changed. I would like to be able to hike through some sagebrush, but all of your sagebrush lands are closed off for the most part. It seems to me that the BLM isn't doing enough for recreation as well as ecosystem management, and that needs to change also.

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

a) Concentrate trails/OHV areas to promote even small areas that are roadless and thus maintain wildlife populations native vegetation and quiet natural soundscapes.

b) All new roads would be built only in areas with existing roads

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Management Administration:

Ensure that any maps provided by the public identify lands with wilderness characteristics and describe motorized use limitations. Give priority in ORV management to prevent unauthorized vehicle use in lands with wilderness characteristics.

Commenter1:Gregg Grant

Comment Excerpt Text:

I have read the Royal Gorge RMP (1996) as I understand the new RMP will replace this. It raises some questions/concerns in my mind. I will refer to Decisions from Arkansas River Subregion #1:

a. 168: "….use will be managed through limitations or closures to protect values; responsible use will be encouraged throughout this subregion where use is allowed." This makes clear that values are to be protected however responsible use will be "encouraged". This implies that responsible use is voluntary and there is no expectation of enforcement of regulation whether this be regulations relating to the vehicle, rider responsibilities or even staying on the allowed trails. This language and intent is not strong enough to protect the lands and the use/enjoyment by wildlife and nonmotorized users.

b. 172: "Information materials for motorized offhighway vehicle recreation opportunities will be developed incorporating public awareness of national programs i.e., Tread Lightly, into IAPS." Additional funding would be required for these materials as well as for personnel to educate OHV users.

c. 173: "Media, informational materials, and physical barriers will be used to encourage users to stay on roads and trails. Again this language of "encourage" is not strong enough. This needs to be about enforcement to protect the closed areas. And again there is funding required for this.

d. 174: "Partnerships will be developed with local or regional offhighway vehicle clubs/groups to assist in coordinating and enhancing offhighway vehicle recreational opportunities". Will partnerships be developed with other parties that would want to influence the use of the BLM land? Motorized and nonmotorized used do not typically mix well from a safety as well as common interest perspective. OHV clubs/groups may have very different priorities to potentially larger population of nonOHV users.

e. 175: "Trails and trailhead facilities for OHV use will be established to meet public demand". Public demand should be what is best for the majority ofusers. Funding will be required to build and maintain facilities. Consideration needs to be given to costs over the life of the plan.

f. 176: "All activity planning for offhighway vehicle use will be accomplished within IAPs". When are IAPs developed?

g. I am surprised that there is no mention of noise issues relating to OHV. Perhaps this comes at a later stage in the process. There have been many studies including some commissioned by the BLM to measure and understand OHV noise. Obviously some land characteristics dampen noise and others amplify noise. We have many BLM areas that consist of beautiful/tranquil canyon terrain. Studies in other areas have shown that canyons significantly amplify noise.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Continue OHV use limitations and increase limited use areas where riparian habitat has been compromised.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

Until BLM revises or amends travel plans in these areas [Garden Park and Shaws Park Travel Management Plan, Arkansas River Travel Management Plan, Gold Belt Travel Management Plan, and Fourmile Travel Management Plan], the RMP should identify areas as "limited to designated routes", and not consider additions to the travel network.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

area designations for Off-Highway Vehicle use (OHVs including over-snow vehicles, snowmobiles, etc.) should adhere to the following parameters: Open areas will be limited to a size that can be effectively managed and geographically identifiable to offer a quality OHV opportunity for participants. Expansive open areas allowing cross-country travel, without a corresponding and identified user need or demand will not be designated in RMP revisions or new travel management plans.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

Though most BLM lands within the ECRPM do not typically hold sufficient snow for winter snowsports, there are some areas with winter recreation assets, particularly in Lake County. With no TMP in place there, we recommend that both summer and winter motorized use be limited to designated routes in order to minimize damage to natural resources, impacts on wildlife habitat and conflicts with other users. CMC's Backcountry Snowsports Initiative identified several areas on BLM land west of Leadville as high-value backcountry skiing terrain. The attached map outlines the areas of human-powered winter recreation use and we recommend that those areas be closed to motorized travel. The BLM should consider additional analysis of winter recreation use on lands within the ECRMP in order to determine other areas where user conflict or natural resources warrant additional management of over-snow vehicle use. Finally, we recommend a minimum snow-depth of 12 inches for oversnow vehicle use throughout the project area in order to protect soil and vegetation.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Travel management in the vicinity of Mosquito Pass is particularly important (and lacking) because use has increased significantly and some established roads and trails, including Mosquito Pass, cross BLM land known to support globally-rare alpine plants. Moreover, BLMlands in this area are adjacent to Pike National Forest and Colorado Natural Area Program lands that support the same (vulnerable) alpine plant communities. New "social" roads and trails are becoming established in this alpine area as different recreation users pioneer new routes across the mosaic of lands administered by the BLM, Forest Service, and Colorado Parks & Wildlife. Consequently, effective recreation management in the Mosquito Pass area may necessarily require greater coordination between managing agencies. Because this intensively used area may be characterized as a predominantly unmodified natural environment in a location that provides moderate isolation, except for facilities/travel routes sufficient to support motorized recreational travel opportunities, it is recommended that this area be classified as "Semi-primitive Motorized" (SPM) for the purpose of providing onsite controls and regulations for the safety of disparate user groups, and for the protection of globally-rare natural resource values.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The Reinecker Ridge area is probably more significant from a resource protection standpoint than a recreation opportunities perspective. This is owing to the fact that public access is limited to a few established roads, and the area is not generally known as a recreation "destination" except by a relatively small pool of hunters, hikers, naturalists, horseback riders, and OHV users. From a recreation opportunities standpoint, the most effective management strategy may be to limit public information about and promotion of the area. This area should be classified as either "Semi-primitive Non-motorized" (SPNM) because of its predominately unmodified natural environment, or "Semi-primitive Motorized" (SPM) to provide seasonal primitive road or trail access while maintaining moderate isolation from the sights and sounds of man. BLM recreational opportunities in this area should be coordinated with Colorado Parks & Wildlife since the James Mark Jones SWA lies at its core. Of particular interest is the seasonal management of motorized travel since this area serves as important over-wintering habitat for large numbers of elk.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Like Reinecker Ridge, the (BLM) area extending south and east of Red Hill Pass is seasonally used by hikers, naturalists, horseback riders, and by deer and elk hunters. Legal access is largely limited to a two-track trail that heads south from the summit of Red Hill Pass, and the area receives relatively little use compared to other public lands in Park County. However, important resources along Red Hill ridge, including bristlecone pine trees, concentrations of wildlife, and documented archaeological sites, may warrant a greater level of recreation management as traffic continues to increase on US Highway 285. It is recommended that this area be classified as SPNM because of its predominately unmodified natural environment, as well as moderate opportunities for isolation and interaction with the natural environment.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The area known as Guffey Gorge (80 acres) is small by BLM standards, but the type and increasing level of use may necessitate more intensive recreation management than it received in the past. This is owing to the fact that it has become a preferred location for large gatherings and parties. Not only does this reality present human health and safety concerns in a rural area, the intrinsic value and appeal of this BLM property may be compromised unless its associated natural resources are protected from overuse or intentional abuse. This area should be classified as "Roaded Natural" (RN) because of the increasing need for on-site controls, regimentation for security, and rustic facilities for user convenience, safety, and resource protection.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Finally, additional BLM travel management measures should be considered in the Sheep Creek Road area. Erosion has been accelerating as both OHV and mountain bike use increases along and adjacent to Forest Road 458 north of Weston Pass (County Road 5). This area should be classified as SPM to provide primitive road access while preventing resource damage by vehicle use.

Organization1:Interim Director, Government Affairs

Commenter1:Jeremy Fancher

Comment Excerpt Text:

The solution in an RMP process would be to either relocate or eliminate the experience, or change the management of the area to accommodate the use. We ask that this RMP process include full consideration and evaluation of current use patterns and experiences to the same degree that the physical and economic considerations are given. In determining management area boundaries and the proscriptions that may change the status quo we ask that those changes explicitly identified in the EIS and on readable maps. Additionally, if the change will alter trail use we ask that those trails are identified in the plan.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

While travel management will not specifically be considered in this RMP, over snow travel should be considered. Over snow travel often occurs over general areas rather than on specific routes. The designation/restriction of land areas available for certain types of over snow travel fits in better with land area planning being considered in this RMP.

Commenter1:Michael Oswald

Comment Excerpt Text:

The [illegible] of the Texas Creek area and the Sand Gulch area in Howard for OHV use has brough a significant number of users to these areas and [illegible] any enforcement of what few rules exist for that use in some cases rampant disregard for the lands health has been the result as well as an increased risks to public safety. If OHV use is to be continued in these areas at current or higher levels there must be rules for traffic control such as direction of travel and speed as well as enforcement fo those rules to prevent further degredation to public safety, habitat and rangeland health.

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

Most BLM lands within the ECRPM do not typically hold sufficient snow for winter snowsports, but there are some areas with winter recreation assets, particularly in Lake County. With no TMP in place there, we recommend that both summer and winter motorized use be limited to designated routes in order to minimize damage to natural resources, impacts on wildlife habitat and conflicts with other users.

Commenter1:Deb Overn

Comment Excerpt Text:

I ask BLM to carefully consider where and how to allow motorized uses. I have lost the ability to use so many areas I once enjoyed due to irresponsible motorized users. Please consider the effects motorized users have on the experience of other users, as well as wildlife. Please take into consideration your ability to enforce rules on your land, and don't increase motorized access in areas where you will not be able to maintain the personnel presence needed to protect resources and non-motorized uses.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

This RMP must consider OSV travel. For the protection of resources, vegetation, wildlife; the avoidance of conflict; and violations on adjacent lands: this RMP should limit OSV use to certaindesignated routes and areas.

Since most BLM lands considered in this RMP are not normally suitable for OSV use, a decision of closed to OSV use unless open should be made. This would be the easiest and most appropriate for the majority of lands in this plan.

If this plan is not going to specifically consider site and route specific OSV planning, an interim designation that limits OSVs to designated routes, existing roads, primitive roads, trails and certain open areas must be applied to all lands deemed as open for OSV travel in this RMP. A limited number of certain designated as open for cross county OSV use areas may be considered to be included in this process. Certain designated routes, existing roads, trails and primitive roads should be considered for interim closure to protect wintering wildlife or other sensitive resources. Certain routes and areas should be closed to prevent trespass, unauthorized use on adjacent lands, or desired experiences of other recreationists.

The BLM should establish a minimum snow depth required for OSV use on these routes and areas. We recommend at least 8". This should be more in certain sensitive areas, and could be less if use is occurring on snow covered maintained summer routes such as roads or trails.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Since the BLM will not be conducting travel planning in this RMP, it is required to complete a baseline inventory of existing routes, and produce a map of these routes. We understand the BLM is conducting such an inventory. This inventory and map should be made available to the public as part of this RMP.

The BLM must make efforts to distinguish current existing routes that it inventoried on the ground as part of this process from the true existing route system that existed in 1996. The map should only depict the routes that existed in 1996 in order to provide a true representation of the legally available baseline motorized route system. Routes that did not exist in 1996 should not be depicted on this map, or, if they are, should be delineated and marked differently so as to distinguish them from the legal 1996 routes.

Any new routes that appear after this inventory is completed should be considered as currently existing.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

a kmz file of routes that currently exists should be made available the public so this can be compared to historical data.

As part of comprehensive travel management planning, the BLM should also consider mapping existing routes used by other user groups such as bicyclists, horse riders and hikers.

We oppose including any unauthorized undesignated motorized or mechanized routes on the baseline maps that are not part of the designated route system where motorized and/or mechanized uses were limited to designated routes in travel plans. Including these unauthorized routes improperly encourages and potentially rewards illegal behavior, and sets a bad precedent. These routes must be labeled as newly proposed in any future travel plan, and undergo full NEPA analysis.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Temporary Closures

The BLM must consider action as part of this RMP process to temporarily close routes that are resulting in resource damage. Instruction Memorandum 2013-035 provides guidance on

incorporating analysis of potential for temporary closures. 43 C.F.R. § 8364.1 allows the BLM to close routes to protect resources and public lands at any time.

There are a number of routes that are exist and are being used on BLM lands that are causing resource damage and should be closed. These include existing routes in areas where motorized use is limited to existing routes, administrative routes that are being improperly used by the public, undesignated and designated routes in areas where use is limited to designated routes, and routes on BLM land that lead to and facilitate unauthorized use on adjacent Forest Service land.

A list of some of the routes that should be considered for temporary closure is attached. (See BLM motorized routes to close). In addition, the BLM should consider taking action to close unauthorized mechanized routes in areas where this use has been limited to designated routes. The BLM has previously received a list of these routes and it is available again on request.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Travel management priorities

The RMP should set priorities for initiating and completing future travel management planning processes.

Areas that have not undergone travel management planning since the 1996 RMP should be considered first.

We suggest that BLM lands in Park County and the southern part of the county be first in line in for travel planning. Users created routes have been rapidly expanding in this area, and overall use of routes is negatively impacting important wildlife and wildlife habitat area. Next in line BLM land west of and between Salida and Leadville must be considered. Unmanaged motorized recreation including dispersed motorized camping near Mt. Shavano and 4WD and OHV use are negatively impacting wildlife and soils. Updates to or new plans in areas with special designations or important natural resources should be prioritized for planning next, along with areas where conflicts are occurring.

The BLM should not consider updating or additions to current newer travel plans until the more urgent and necessary planning priorities above are completed. We feel it is improper and unnecessary to consider revisions to the existing Arkansas River and Fourmile travel plans, when other areas are in dire need of planning and management actions to mitigate negative impacts to wildlife, soils and other natural resources.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Over snow travel

While travel management will not specifically be considered in this RMP, we strongly recommend that over snow vehicle (OSV) travel be considered. There are many areas being considered in

this RMP that are at high elevations and have regular snowpack that could be, and are, used for OSV travel. Every acre of land being considered in this RMP can potentially receive snow and have significant snow on the ground making it suitable for OSV travel. Over snow travel often occurs over general areas rather than on specific routes. The consideration of designations and restrictions of land areas available for certain types of over snow travel fits in better with the type of land area planning being considered in this RMP process.

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

Even though specific trail planning and management guidelines are normally not written in detail until the RMP Implementation Stage, Trail Planning and Management Direction is required by the Land Use Planning Regs to be included within the RMP decision itself, as "Sideboards" for how the subsequent TMPs will be conducted.

Commenter1:345219

Comment Excerpt Text:

I realize that the BLM may be feeling great pressure from wellfunded sources to open the BLM lands to more motorized travel.

This is a bad idea for several reasons:

1) Motorized travel reduces the ability to sustain wildlife.

2) Motorized travel creates enormous amounts of dust, reducing the ability to sustain plant life.

3) Motorized travel is noisy and not conducive to preserving the area for all uses.

4) Once an area is open, maps are created and thus it becomes very difficult to close.

Commenter1:345219

Comment Excerpt Text:

Please consider that once an area is open, it is hard to close. So open judiciously.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Until BLM revises or amends travel plans in these areas, the RMP should identify areas as "limited to designated routes", and not consider additions to the travel network.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

No additional routes created after the start of this RMP should be considered as "existing." The RMP should also set travel management prescriptions for special management areas, such as lands with wilderness characteristics and ACECs.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In order to finalize travel networks within the required timeframe, BLM should prioritize areas for travel planning. We recommend BLM prioritize the following areas for completing travel management within two years after signing the ROD, and the remainder of areas be done within five years of signing the ROD:

1. Isolated areas without existing travel planning that do not have high integration with existing designated travel network

Including: Park County, areas outside west Salida northward to Leadville, Stanley Creek, fragmented parcels in the northern portion of the planning area

2. Areas of high resource importance/sensitivity and specially designated areas

Including: Phantom Canyon, Beaver Creek, Grape Creek

3. Areas of high (or potentially high) resource or resource-use conflict

Including: Trails for different recreation user-types surrounding the Gold Belt Scenic Byway

4. Areas of high use that are within existing, but older TMPs

Including: areas in the Four Mile Travel Plan

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Recommendation: BLM must set a framework for future travel planning in the Royal Gorge Field Office that incorporates the following elements:

-Areas or travel management zones are designated in the RMP along with general direction for travel management, including recreation opportunity spectrum classifications and road density goals.

-Travel management zones should form the basis for future travel management plans and should be of an appropriate size to allow for impact analysis and comprehensive route designation across a landscape while ensuring the travel planning process is manageable for the agency and the public. Most zones should include various recreation uses.

-A preliminary route network is identified and mapped as part of the RMP.

-Route designation should be incorporated into the RMP for key areas, including: ACECs, lands with wilderness characteristics, recreation management areas, other designated areas and existing or potential conflict areas.

-Even in the absence of comprehensive travel planning, the RMP should consider temporarily closing routes that are causing resource damage or user conflict, and designating routes as administrative use only that serve specific permitted uses.

-The remainder of the planning area should be prioritized and dates set for completion so that the designations can be completed within five years.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must design OHV areas in the plan that minimizes conflicts among users and damage to natural resources. Areas must be evaluated to ensure that they are located and bounded to meet the minimization criteria for purposes of BLM management and enforcement. We request that BLM apply the minimization criteria by showing how it is specifically minimizing impacts to resources and conflicts to other uses for each route as required by law. New open areas should not be designated.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We also recommend that the BLM look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (Attachment A.6), as an example of criteria that incorporate key aspects of BLM's OHV regulations as well as ecological metrics.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The above guidance from IM 2013-035 on incorporating analysis of potential for temporary closures should be included in the RMP. BLM should issue temporary closures for any area where OHVs are currently harming or may harm natural or cultural resources in the interim.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Quiet recreation in the Royal Gorge Field Office is a top concern for the undersigned groups and our members. The public lands in eastern Colorado play an irreplaceable role in Colorado's recreation landscape.

Recommendation: We recommend BLM designate and protectively manage a significant amount of area in the Royal Gorge Field Office for quiet and non-motorized recreation opportunities.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should continue monitoring and data collection efforts for recreation throughout the Royal Gorge Field Office during the RMP planning process. Data and analysis should be made available to public prior to the release of the draft RMP, and should be used to inform recreation management alternatives and decisions.

Commenter1:Priscilla Webster

Comment Excerpt Text:

My husband and I live in Chicago but come to Buena Vista frequently because it combines the natural beauty of the mountains and open parklike areas with compatible, lowkey development. This combination provides plenty of outdoor activities for all ages while preserving the fragile environment and the natural peace. You can hear the wind, the birds and even the animals, as well as see them, if you are lucky. We value this quiet highly. We are among the beneficiaries of the recreational use that BLM allows on the lands it manages, and we would not want to deny this pleasure to others. But I feel strongly that the best way to preserve this opportunity for as many people as possible is to avoid allowing uses that threaten the fragile physical environment and shatter the peace. Trails for hikers and bikers are compatible with sustained and frequent use, but use by motorized vehicles is not. We have stayed in other places where OHV use is permitted, where we experienced the resulting noise and environmental destruction, which is why we avoid those areas in favor of the still beautiful area near Buena Vista.

Recently, our daughter, her husband, and their two children (then 8 and 5) came with us to Buena Vista. The highlight of that trip was a family hike up Midland Hill. The eight yearold scampered up quite quickly, sometimes getting ahead of us, but the five yearold found the climb difficult. She persevered, and was thrilled to stand on top of the hill, looking down onBuena Vista on one side and on the lovely hills and parks on the other. All was quiet except for the cheery greetings of other hikers, some with dogs, whom we encountered. It was a magical experience, and the children, exuberant after their success in the climb, darted down the clearlymarked trail ahead of us. We were comfortable for them to do that, tellingthem only to stop at the access road and wait for us. How different that hike would have been if it had been anywhere near areas open to OHV use! In fact, we certainly would not have made such a hike if OHVs were allowed in the area. It would have shattered the quiet, torn up the fragile terrain, destroyed the lovely flora and frightened the animals. And we would not been able to allow the children to have any independence from their elders if we were concerned about OHVs.

In revision of the RMP, we urge that future planning for OHV access consider the impact of noise on citizens like ourselves who treasure the quiet of nature. All of us can enjoy such use together, but once OHVs are allowed, their users “own” the space allocated to them, plus at least a half mile on all sides. That drives the rest of us out. We believe BLM is mandated to consider noise

impacts. Exec. Order 11989 (1977) directs the BLM to locate areas and trails so as to: "Minimize conflicts between offroad vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors." We therefore request that BLM conduct comprehensive noise studies if considering expanding OHV access in highlyused Travel Management Areas like the Fourmile.

B.1.19.2. Travel and Trails Management - Baseline Affected Environment

Total Number of Comments: 2

Summary

The BLM should emphasize interagency coordination and edge mapping to be consistent with management on adjacent public lands.

See Section 2.3.1.17, Travel and Trails Management (p. 26)

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Another concern is the close proximity to, and patchwork of, BLM lands with adjacent private lands which occurs throughout the RMP area. Not all private land/BLM land boundaries are clearly marked. Colorado Revised Statute 33-14-113 prohibits operation of snowmobiles on private land without consent of the private land owner. Allowing unrestricted snowmobile use on BLM in areas where there is a patchwork of private and public land facilitates snowmobile trespass and the violation of State laws.

There are many areas on BLM land that share common unmarked boundaries with USFS land which prohibits OSV use. Unmanaged OSV use on BLM land is facilitating unauthorized OSV use on forest land.

A recent court ruling is requiring the USFS to reevaluate its regulations on OSV use. Forest units will be conducting winter OSV planning soon, and now is the perfect time for interagency coordination and cooperation with regards to OSV use.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Many studies have focused on the effects of roads on big game animals such as elk and deer. [3. Watson, Mark L. 2005. Habitat Fragmentation and the Effects of Roads on Wildlife and Habitats. New Mexico Department of Game and Fish. Available at: http://www.wildlife.state.nm.us/conservation/habitat_handbook/documents/2004EffectsofRoadsonWildlifeandHabitats.pdf] Each mile of 16-foot-wide road that is constructed is estimated to remove two acres of habitat for deer and elk. This is in addition to the effects of habitat fragmentation and disturbance that affects the utilization of an area by wildlife.

B.1.19.3. Travel and Trails Management - Impacts

Total Number of Comments: 1

Summary

The BLM should analyze the impacts of over-snow vehicles.

See Section 2.3.1.17, Travel and Trails Management (p. 26)

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Unregulated over snow vehicle travel on BLM lands having negative impacts on wildlife, plants and resources in certain areas. Existing BLM travel management plans did not consider snow travel. Often times sensitive areas on BLM lands only small amounts of snow which is insufficient to protect and shelter vegetation. For example, cross country snowmobile use in the Castle Garden area with minimal snow cover has damaged critically imperiled Brandegee wild buckwheat. Snowmobiles are intruding into winter concentration areas for big game: stressing the animals and decreasing their ability to survive the harshest season.

Unregulated over snow vehicle use on BLM lands is causing conflicts with quiet winter recreationists on BLM lands. Skiers, snowshoes and snowboarders report conflicts due to noise exhaust and disrupted untracked snow.

B.1.20. Lands and Realty - Corridors

B.1.20.1. Lands and Realty - Corridors - Alternatives

Total Number of Comments: 7

Summary

The RMP range of alternatives should consider the following corridor allocations:

- collocating corridors and communication sites to reduce surface disturbance and preserve viewsheds
- excluding communication sites in sensitive viewsheds
- ensuring corridors meet developers needs so they do not need to place developments outside the corridors
- de-allocating the West-Wide Energy Corridor 87-277
- incorporating the design features from the Solar Programmatic EIS
- collocating different types of utility/pipeline corridors when appropriate

- continuing to leave the majority of the planning area open to utility corridors with appropriate stipulations and mitigation measures

See Section 2.3.1.18, Lands and Realty (p. 27)

Commenter1:Jay Gingrich

Comment Excerpt Text:

Restrict new utility routes to existing corridors.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Pipeline and corridor access. The County requests that existing corridors and communication sites be used (co-location), in order to reduce surface disturbance and preserve scenic values in Park County. The County requests that communication sites not be placed in sensitive viewsheds, and would like to work with BLM to identify those areas prior to any new projects. Any activity must comply with the Park County Strategic Master Plan and zoning requirements (Park County 2001).

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Rights of Way and Land Use Authorizations (Right of Way Exclusions)

Park County requests that BLM notify and confer with the County when any projects are proposed within the County, and refer proponents to the County for permitting

Commenter1:Kevin Bradley

Comment Excerpt Text:

On a very personal note: maintaining good, well thought out, well designed, roads is perhaps the most pressing safety issue particularly in terms of fires and floods. The Cristo project, Over the River, has highlighted this issue on the largest and most critical transportation corridor in the region.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

As described in detail in those comments (Attachment A.3), BLM should use the RMP revision to:

-Ensure the corridors are functional so that they are used by developers, thus limiting impacts from transmission and pipeline development and accessing renewable energy. This requires going beyond improving the locations of the WWEC to also addressing other issues such as nonfederal lands the WWEC may cross, incentivizing development in the corridors, and capitalizing on near-term opportunities to improve the corridors through ongoing land use planning efforts.

-Assess the existing and potential future WWEC to justify if and how they will facilitate appropriately-sited renewable energy development and analyzing the WWEC to identify and address environmental conflicts. This assessment should include new and relevant data for transmission needs and potential environmental impacts; an improved screening and analysis process for WWEC using BLM Arizona's Restoration Design Energy Project as a model; screening and analysis on non-federal lands the WWEC may cross; engagement in other relevant planning efforts; and a robust stakeholder outreach program. The RFD recommended for wind and solar in these comments would also inform this assessment.

-Improve the Interagency Operating Procedures (IOPs) by incorporating the Design Features from the BLM Solar Programmatic Environmental Impact Statement through the ECO RMP revision.

-Make specific changes to the WWEC to better avoid environmental conflicts and impacts and access renewable energy. Specific recommendations are provided below.

-Involve counties and communities affected by the WWEC in meaningful ways. Public engagement through the RMP revision provides an opportunity to do this.

Accordingly, BLM should de-designate WWEC 87-277 through this RMP revision, listed as a Corridor of Concern in the settlement (official title). The current corridor traverses significant

parcels of roadless lands, including citizen inventoried lands with wilderness characteristics. Units include Badger Creek, Cottonwood Creek, Thompson/Gribble/Twin Mountain, and Cooper Mountain. Included in these areas are Citizen Proposed Wilderness; areas of particular concern to the conservation community. We also note significant wildlife resources and potential impact in the Chipeta Palone Foothills and Castle Garden areas. The settlement agreement identifies conflicts with coal, Wilderness, sage-grouse habitat, and National Historic Places as reasons for identifying WWEC 87-277 as a Corridor of Concern. BLM should make all efforts to site transmission and utility corridors along existing infrastructure and developed areas. As it stands, development in this West-Wide Energy Corridor would cause significant impact on sensitive resources and largely undisturbed landscapes.

Organization1:Xcel Energy

Commenter1:Susan Innis

Comment Excerpt Text:

Xcel Energy does support the BLM's proposed approach from the Analysis of the Management Situation for the Eastern Colorado Management Plan to, "Use the following as a default decision statement for various management units: The majority of the public lands will be open to development for utility corridors; stipulations and mitigation measures will be developed on an individual, site-specific basis." (Page 350)

Organization1:Xcel Energy

Commenter1:Susan Innis

Comment Excerpt Text:

While Xcel Energy does support co-locating in utility corridors when feasible, the door should not be closed on locating new transmission lines in other locations. Often times, locating a new corridor outside of an existing route can provide benefits both to the utility and the land management agency.

B.1.21. Lands and Realty - Land Tenure

B.1.21.1. Lands and Realty - Land Tenure - Alternatives

Total Number of Comments: 19

Summary

Several parcels should be acquired:

- private lands providing access to public lands for improved access to elk hunting areas
- key conservation lands and/or easements to protect large landscapes, improve connectivity, reduce habitat fragmentation, and secure critical wildlife habitat

Several parcels should be disposed:

- Section 7, T51 N, R8E, but also extending into Sections 8, 32, and 33 of T15S, R78W

- Section 31, T5N, R61W; Sections 5, 6, 7, and 8, T4N, R61W; Sections 1, 11, 12, and 13, T4N, R62W
- Lots 6 and 10 of the Aspen Meadows Ranch
- lands that are submerged by Bijou No. 2 Reservoir

Several parcels should be retained:

- lands that have conservation, recreation, or other values that benefit the national interests
- lands with important wildlife habitat, rare wetlands, open space, and cultural resources, and that contribute to meeting the RMP goals
- BLM-administered lands being managed for their natural or cultural resource values
- lands around the Hayden Ranch near Leadville
- BLM-administered lands located in T10S and T11S, R80W, 6th Principal Meridian, Lake County
- BLM parcels located in Sections 17, 18, 21, 22, 28, 27, 33, 34, and 35 of T10S, R80W, 6th Principal Meridian, Lake County; and Sections 2, 3, 10 and 11 in Township 11 South, Range 80 West in the 6th Principal Meridian of Lake County
- lands with wilderness characteristics

See Section 2.3.1.18, Lands and Realty (p. 27)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF has increased its focus on elk hunter access to large blocks of public land that are not currently accessible. We want to work with BLM staff to identify these areas and work with private landowners to purchase land or elk hunting access easements (permanent or long-term) that will provide access for elk hunters to large tracts of public land. This effort will provide more quality hunting experiences, and further the efforts of the state wildlife management agencies in achieving elk harvest levels that ensure elk population objectives can be met.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

RMEF encourages the BLM to identify and acquire key conservation lands or easements to protect large landscapes, improve connectivity, reduce habitat fragmentation, and secure crucial wildlife habitat (i.e., migration corridors/stopover habitat, elk summer and winter range) to maintain healthy herds and diverse biological communities.

Every year, our public lands become more critical to elk and other wildlife due to habitat loss on private land. When privately owned wildlife habitat within or immediately adjacent to public land becomes available for purchase, we urge BLM to work with RMEF and other national and local conservation groups to acquire parcels, enter into land exchanges, or obtain conservation easements to secure more elk habitat for the future.

Organization1:Mesa Antero Property Owners Association

Commenter1:Drew Ludwig

Comment Excerpt Text:

That said, there is a particular parcel of land in Chaffee County that I believe would be inappropriate for disposal. This parcel is located primarily in T51 N, R8E, Section 7, but also extends into Section 8 and Sections 32 and 33 in T15S, R78W.

This Public land supports an existing grazing lease, but also many species of wild life. I have observed mule deer, pronghorn, elk, coyotes, bobcats, and several species of raptors on these lands. County Road 272 also passes through this parcel and serves as the access to the Browns Creek Trailhead on the San Isabel National Forest. This area of the Forest is probably one of the most heavily used informal camping areas in the County. Thus, the parcel contains many important resource values, including grazing, wildlife, recreation, and visual resources.

Organization1:Riverside Reservoir & Land Co.

Commenter1:Don Chapman

Comment Excerpt Text:

The BLM should have allocated to it the resources necessary to speed up the sale of lands in its portfolio that have been determined as for sale.

The parcels identified above [Sec.31, T5N, R61W; Sec. 5, 6, 7, 8, T4N, R61W; Sec. 1, 11, 12, 13, T4N, R62W] should not be restricted from sale.

No public access should be allowed or encouraged on the parcels listed above.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

We also ask that BLM designates lands around the Hayden Ranch near Leadville as land for retention

Organization1:Lake County Open Space Initiative (LCOSI)

Commenter1:Mike Conlin

Comment Excerpt Text:

At the time of LCOSI's inception, BLM lands located in Township 10 and 11 South, Range 80 West of the Sixth Principal Meridian in Lake County, Colorado were disjointed and isolated from

one another (Map 1), making management difficult and leading to a management classification for some of the parcels as lands available for "disposal". LCOSI requested that the classification be changed to "retention", to reflect their critical location within the foreground and middle ground viewsheds of Colorado's highest peaks as viewed from the Top of the Rockies National Scenic and Historic Byway, and their resource values for providing open space, wildlife habitat,

and outdoor recreation opportunities. Communications from the BLM indicated that an addendum in the existing Resource Management Plan would not be practical at that time, and that the formal change should be effected in the next revision of the Royal Gorge Resource Management Plan, which is currently being undertaken.

Organization1:Lake County Open Space Initiative (LCOSI)

Commenter1:Mike Conlin

Comment Excerpt Text:

The Lake County Open Space Initiative would request that the BLM parcels located in Sections 17, 18, 21, 22, 28, 27, 33, 34 and 35 of Township 10 S, Range 80 West of the 6th Principal Meridian in Lake County, and Sections 2, 3, 10 and 11 in Township 11 South, Range 80 West in the 6th Principal Meridian of Lake County Colorado be

classified for retention in the Eastern Colorado Resource Management Plan, and be managed as open space in conjunction with the goals and management objectives of the LCOSI Ecosystem Management Plan.

Commenter1:Leanna and Alfred Mahuka and Webster

Comment Excerpt Text:

BLM 40 Acres identified in Yellow on the attached map is surrounded on 4 sides by private land. Landowners (Alfred Webster and Leanna Mahuka) of Lots 6 and 10 of the Aspen Meadows Ranch request this 40 acres to be disposed through sale or exchange.

We would like to acquire the 40 acres.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

[LWC] Realty:

These lands should be retained as public lands and not offered for exchange or disposal.

Organization1:Colorado Mountain Club

Commenter1:Julie Mach

Organization2:Colorado Mountain Club

Commenter2:Thomas Mowle

Comment Excerpt Text:

We also recommend that BLM does not make any lands available for disposal that have conservation, recreation or other values that benefit the national interest by retaining them in public ownership.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

We appreciate the retention of BLM lands summarized in the 2005 Land Tenure Adjustment, which was based on important mountain plover habitat, rare wetlands, open space, cultural resources, and goals set forth in the Eastern Colorado Resource Management Plan Scoping Comments July 2015 Park County Master Plan. We strongly support no additional changes in land tenure during this current RMP process, unless the County is consulted, in order to ensure these resources are protected.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County supports the existing Land Tenure decisions stated in 2005 Land Tenure Adjustment Record of Decision(ROD) because those decisions provided protection for critical resources including Mountain Plovers, wetlands, and cultural resources. The County requests no additional changes in land tenure during this current RMP process, unless the County is consulted, in order to ensure these resources are protected.

The Eastern Colorado Analysis of Management Situation (AMS) document states the following for Subregion 4, South Park:

Acres for disposal: 15,858 acres

Acres for disposal through exchange, lease or transfer: 41,923 acres

Acres for retention or exchange: 12 acres

However, the 2005 Land Tenure Adjustment ROD states:

Acres for disposal: 3,953 acres

Acres for Retention: 40,316 acres

Acres Exchange Restricted: 19,330 acres

Park County supports the Land Tenure Adjustment decisions in the 2005 ROD and asks that the numbers be retained in the Eastern Colorado RMP.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The stipulations and BMPs in the existing RGFO RMP and 2005 Land Tenure Adjustment amendment (particularly regarding fens and Mountain Plover) should be fully described in the new RMP, with any needed updates and additions included.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

The ECRMP should include the possibility that the State of Colorado may be interested in exchanging or selling adjacent state-owned lands (i.e., not under Monument management so they will not be included in the BCNMRMP and thus need to be considered in the ECRMP) so they may be included in the National Monument.

Commenter1:Heike Momiyama

Comment Excerpt Text:

Land Ownership – I think Land Ownership in the RMP refers to land ownership by the BLM. However, I would just like to note here that I own land that borders BLM land. I am very interested in how the land around me will be managed over the next 20 years. I plan to stay involved in this process and will provide additional comments as more detail is provided.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

With 6.6 million acres of federal minerals in Colorado and the federal government in the deficit that is spiraling out of control, I would encourage the BLM to sell the 2.679 million acres under local, state and private land. This would give the opportunity for private property owners to capitalize on mineral income.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

Lands that have conservation, recreation or other values that benefit the national interest should be retained in public ownership and not disposed of or sold/traded.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Public lands being managed for their natural or cultural resource values should be retained in federal ownership. BLM should not make available for disposal any land that is managed for conservation goals and objectives or other public enjoyment, including specially designated areas. It does not serve the national interest to dispose of these valuable lands nor would these lands fit into one of the narrow exceptions provided for disposal set out in FLPMA. Rather, FLPMA specifically directs the BLM to ensure protection of "the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." 43 U.S.C. § 1701(8).

Recommendations: BLM should not make any lands available for disposal that have conservation, recreation or other values that benefit the national interest by retaining them in public ownership.

Organization1:BIJOU IRRIGATION COMPANY AND DISTRICT

Commenter1:DENICE WAGNER

Comment Excerpt Text:

These comments are submitted by Bijou Irrigation Company and Bijou Irrigation District (Bijou). The reasons listed below should present evidence of why the "lands" indicated should be considered "DISPOSAL LANDS" and be written in the RMP.

Bijou Irrigation Company owns and operates Bijou No. 2 Reservoir (No. 2). The "lands" owned by BLM in the location of the No. 2 are submerged by water and inaccessible by the public. Bijou Irrigation District owns and operates Empire Reservoir (Empire). The "lands" owned by BLM in the location of Empire are submerged by water and inaccessible by the public. The

following reason for "NO Public Access" are: 1) water/ the rest of the lands are controlled by Bijou and/or private landowners; 2) the "lands" also include dams, which are classified by the State of Colorado Dam Safety Engineer Branch as "High Hazard" or "Significant Hazard" dams which eliminates public access; and 3) "lands" have no economic value to the greater public.

Please consider these reasons for claiming these BLM lands as Disposal Lands.

B.1.21.2. Lands and Realty - Land Tenure - Baseline Affected Environment

Total Number of Comments: 3

Summary

The BLM needs to ensure that there is adequate stakeholder coordination and involvement when determining which parcels are allocated for retention and disposal.

See Section 2.3.1.18, Lands and Realty (p. 27)

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Per the June 2015 Analysis of the Management Situation of the Eastern Colorado RMP (page 352), BLM is considering the option of allowing for disposal of lands, especially isolated tracts, that are not significant or needed in protecting resource values, as well as allowing for acquisition of land through donation. Denver Water believes it is important to ensure that adequate stakeholder coordination and NEPA analysis is performed to support informed decision making related to any and all land tenure adjustments.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

The National Park Service manages nine major units within the EC planning area, and one immediately adjacent to the planning area, that could be adversely affected by management decisions within the ECRMP. Significant units of the National Park System Units within and adjacent to the EC planning area include:

1. Bent's Old Fort National Historic Site (near La Junta, Otero County) – Emblematic of the period of Western expansionism and the relations between settlers in Colorado Territory and Native American Plains Indian tribes, Bent's Old Fort features a reconstructed 1840s adobe fur trading post on the mountain branch of the Santa Fe Trail where traders, trappers, travelers, and the Cheyenne and Arapaho tribes came together in peaceful terms for trade

2, Sand Creek Massacre National Historic Site (near Eads, Kiowa County) - Commemorates a tragedy that marked a sea-change moment in U.S. history, when, in a violation of its treaty with Native American Plains Indian Tribes, Colorado Territorial cavalry attacked a peaceful Indian encampment, facilitating the circumstances necessary for future U.S. Westward expansion.

3. Florissant Fossil Beds National Monument (Florissant, Teller County) - One of the

richest known fossil deposits in the world reveals the remarkable flora and fauna of prehistoric Colorado preserved by once-active volcanoes, including petrified stumps of giant redwood trees.

4. Rocky Mountain National Park (Estes Park and Grand Lake, Boulder, Larimer and

Gilpin counties) – Rugged vistas of 72 named peaks over 12,000 feet, including the famed Longs Peak and Mount Meeker, Rocky Mountain includes 415,000 200,000 square miles of designated wilderness and houses the headwaters for the Cache La Poudre River, the only designated Wild & Scenic River in the state, and the Colorado River. Rocky Mountain National Park is protected under the National Clean Air Act (CAA) as a Class I airshed, but experiences significantly threatened air quality from sources on both sides of the Continental Divide.

5. Great Sand Dunes National Park & Preserve (Mosca, Alamos and Saguache counties) – Just outside of the planning area boundary, Great Sand Dunes includes the tallest dunes in North America at the base of the Sangre de Cristo mountains. Great Sand Dunes is managed for its pristine ecological conditions within the park as well as recreational hunting on the preserve. Also protected as a Class I airshed with threatened air quality status from pollution sources on the Front Range and agricultural activities within the San Luis Valley.

6. Cache La Poudre National River Corridor and National Heritage Area (Larimer and Weld Counties) - The Poudre River Corridor is protected as a National Heritage Area for its contribution to the formation of Western water law and to the region's agricultural heritage. Additionally, 76 miles of the river upstream from the heritage area are managed for wild and recreational values under the Wild & Scenic Rivers Act of 1968 by the United States Forest Service (USFS).

7. South Park National Heritage Area – Highlights the cultural and natural resources of one of Colorado's vast and stunning interior mountain valleys, or parcs, that helped to define the state's mountain heritage and provides grazing habitat for wildlife and livestock, as well as extensive recreational opportunities. NPCA is pleased that a Master Leasing Plan for the South Park area is proposed as part of the RMP.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

Also included in ECRMP planning area are 12 of the state's 24 National Historic Landmarks (1) U.S. Air Force Academy Cadet Area(Colorado Springs); 2) Bent's Old Fort (Otero County); 3) Cripple Creek Historic District (Teller County); 4) Pike's Peak (El Paso County); 5) Colorado Chautauqua (Boulder); 6) Denver Civic Center (Denver); 7) Granada Relocation Center WWII Japanese internment camp (Prowers County); 8) Lindenmeier Folsom Culture archaeological Site (Soapstone Prairie Natural Area, Larimer County); 9) Ludlow Tent Colony Site (Las Animas County); 10) Raton Pass (Las Animas County); 11) Philadelphia Toboggan Company Carousel No. 6 (Kit Carson County); 12) Rocky Mountain National Park Administration Building (Estes Park)) as well as the Santa Fe Historic Trail and Continental Divide National Scenic Trail. Together, these features illustrate Eastern Colorado's unique and diverse history

B.1.21.3. Lands and Realty - Land Tenure - Impacts

Total Number of Comments: 6

Summary

The EIS should analyze impacts of disposing of BLM-administered lands, including:

- a loss of multiple resources that residents, absentee property owners, and visitors to the area deem important
- access and erosion issues, high density, and potential groundwater issues
- increasing fragmentation

See Section 2.3.1.18, Lands and Realty (p. 27)

Commenter1:Tim Krantz

Comment Excerpt Text:

I am writing to express my concern about BLM land that was slatted for disposal in the previous RMP. The BLM land I am most concerned with is in Teller County north of Cripple Creek Colorado, specifically in the Gillett and Bernard Creek East custodial grazing allotments. While the BLM owned property in these allotments is somewhat fragmented by private property in the form of patented mining claims, the BLM is the largest individual property owner in this area and I fear that the sale of this land will result in a loss of multiple resources that residents, absentee property owners and visitors to the area hold dear.

Commenter1:Tim Krantz

Comment Excerpt Text:

the scenic resource that this open land [in Teller County north of Cripple Creek Colorado, specifically in the Gillett and Bernard Creek East custodial grazing allotments] provides is unique to this area. The presence of grazing in this area allows for the private property owners to keep their parcels undeveloped with agricultural tax status. Most of these small parcels are currently used as a mountain get away camping and recreation parcels. Since the parcels in the area are composed mainly of small 10 acre and less mining claims, they have been legally split by varied seniority of overlaid claims. Most of these claims were established and split prior to June 1st 1972. Loss of grazing in the area and possibly eventual loss of agricultural status would make these parcels taxed as vacant land which is a significant increase in ownership cost. This would incentivize development of these small parcels. Since these parcels were established prior to 1972, they are eligible for a well and septic. These overlapping mining claims were not created to be developed as residential property, and if developed would result in access and erosion issues, alarmingly high density and potential ground water issues.

Commenter1:Tim Krantz

Comment Excerpt Text:

the Gillett and Barnard Creek area is a very productive native grass grazing land with copious surface water. The property records in this area show that most of the private property owners

in the area embrace the grazing of the area with grazing leases and agricultural tax status. The current BLM parcels in the area if sold would likely eventually fragment the area with fence, making grazing impractical.

Commenter1:Sue Schoultz

Comment Excerpt Text:

I am writing in concern to the proposed plan to dispose of BLM land north of Cripple Creek.

As a homeowner and rancher, I have seen what land development and the impact that lack of grazing can have on our land.Land that is grazed under a rancher's care has shown an increase in forage possibilities for all wildlife and domestic animals. As a tax payer I would like the BLM to reconsider selling to developers and maintain the beauty and land usability for generations to come.

Commenter1:Steve Peterman

Comment Excerpt Text:

I would like to comment on the recent proposal to dispose of BLM property in the Gillette and Bernard Creek East grazing allotments. Based on the location and configuration of these public lands (previous mining claims) it is my humble opinion that the sale of these properties will not be practical. As a property owner in said area, I can’t begin to imagine the complexities of 1) access to various properties, 2)development logistics for potential buyers, 3)issues surrounding ground water, erosion, and especially sewage related needs for buyers.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Denver Water believes it is important to ensure that adequate stakeholder coordination and NEPA analysis is performed to support informed decision making related to any and all land tenure adjustments

B.1.22. Lands and Realty - Renewable Energy

B.1.22.1. Lands and Realty - Renewable Energy - Alternatives

Total Number of Comments: 10

Summary

The BLM should emphasize renewable energy areas in the RMP instead of fossil fuel developments. In areas of solar development, the RMP should include measures that do not fence out cattle and wildlife, do not strip the land, and avoid critical migration corridors and wildlife habitat. Projects should follow the BMPs found in the Solar Programmatic EIS Record of Decision.

See Section 2.3.1.18, Lands and Realty (p. 27)

Commenter1:Eric Tussey

Comment Excerpt Text:

The people of Colorado do not want more fossil fuel development. We

want renewable energy development. So do not start leasing our public

lands for oil and gas extraction.

Commenter1:Nicholas DiOrio

Comment Excerpt Text:

Energy development can be done on public lands in a responsible, environmentally friendly way. Solar and wind power do not pollute the atmosphere or the surrounding community and provide power without using water, an incredibly important consideration in the dry mountain west. It is my profound belief that our most precious resources must be preserved and I truly appreciate your consideration regarding these tough issues.

Commenter1:Dale Lyons

Comment Excerpt Text:

Please create a process so that alternative energy production could collect energy on BLM land.

Create a process that the alternative energy companies can apply for permits in the same manner that the hydrocarbon extraction industry is able to

Commenter1:Carolyn Oldewage

Comment Excerpt Text:

The time is now for us to move away from a fossil fuel society.

Colorado needs to be a leader in this movement, not a contributer to

the vast social, environmental, economic, and political destruction

caused by the oil and gas industry.

Commenter1:R. Burghilde

Comment Excerpt Text:

Given the circumstances, the soundest solution would be to open up the land to renewable energy companies. While any development impacts the environment and wildlife, this is the one of the two options causing lesser harm. The socioeconomic benefit would be greater, since it would create ongoing local jobs, not promote climate change, and over all have much less externalities. The overall goal of opening up BLM land to private industry as well as promoting energy resources would still be maintained.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

[Park County]The County requests consultation in the early stages of any project and will require a Special Use Permit for any of these renewable energy projects.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Solar

-Most of Park County is in a solar energy variance area; projects are expected to be smaller than 20 mW if any are proposed. If any project is proposed for Park County, the County strongly prefers that an EA be conducted to allow for public input.

-BLM should maintain the current exclusion and variance areas for solar energy in Park County as identified in the 2012 Solar PEIS.

-Park County prefers that projects: do not fence out cattle and wildlife, do not strip the land, and avoid critical migration corridors and wildlife habitat.

-If solar development occurs, BLM should implement appropriate BMPs provided in the "Approved Resource Management Plan Amendments/Record of Decision (ROD) for Solar Energy Development in Six Southwestern States, October 2012."

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Wind

-Park County prefers that wind energy development not occur on the Mosquito Range or Reinecker Ridge due to wildlife, rare plants, and visual concerns.

Geothermal

-Two potential locations have been identified in Park Co, Hartsel Hot

Spring and Rhodes Warm Spring, with BLM minerals

-The County requests early involvement in a proposed project due to issues such as infrastructure and impacts on private wells, disruption of aquifer flow, etc.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

For solar or wind alternative energy projects, do not allow stripping of land.

Commenter1:Joseph Edes

Comment Excerpt Text:

Consider stipulating that solar installations do not disturb the ground after initial installation access. It would be a simple matter to place solar panels high enough for people, livestock, and wildlife to walk beneath. Shade can benefit vegetation when temperatures soar. Also, instead of square sided plots, we know that, for example, pixels can form any sort of shape. Viewed from a distance a solar installation could have visually pleasing contours. Solar panels do not have to be bright blue in color. These simple ideas can be stipulated in the near future, because eventually a landscape dominated by ugly anything, be it oil wells or solar electric installations, will be rejected for more aesthetic outcomes. How does this fit into the ECRMP? I would suggest it be included as an alternative course of action.

B.1.23. Lands and Realty - Withdrawals

B.1.23.1. Lands and Realty - Withdrawals - Alternatives

Total Number of Comments: 4

Summary

The BLM needs to consider retaining existing withdrawals, as well as recommending new withdrawals. The following areas should be withdrawn: perennial riparian areas, fishery habitat, special status animal habitat, the Arkansas River corridor and the Arkansas Canyonlands ACEC, one-half mile along the Gold Medal Fishery on the Middle Fork of the South Platte River and Spinney Mountain Reservoir, a minimum of 1,000 feet from fens and reservoirs (including Antero, Spinney, and 11-Mile Reservoirs), and all land within existing and proposed ACECs.

See Section 2.3.1.18, Lands and Realty (p. 27)

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

The 1996 ROD contains directives for withdrawing perennial riparian areas, fishery habitat, special status animal habitat (which we would assume to include sensitive fisheries within in this discussion), and the Arkansas River corridor. We request an update on the status of these actions and if incomplete, the BLM should review and analyze these withdrawals for future protection efforts in the new RMP.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

With the recent increase in Gold Medal waters designation on the Arkansas River, the Arkansas Canyonlands ACEC now contains Gold Medal waters. We request full withdrawal from future mineral leasing for this ACEC in order to protect the fishery and water quality environment.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Minerals Withdrawal. The County asks BLM to consider recommending minerals withdrawal for lands adjacent to selected water bodies in Park County. The goal is to prevent the migration of mining-related contamination into the drinking water supply for 1.5 million people. The County recommends withdrawal:

- For the Gold Medal Fishery on the Middle Fork of the South Platte River and Spinney Mountain Reservoir, a ½-mile withdrawal
- To protect fens and reservoirs. The distance would be determined by calculation of ground water velocity, but a minimum of 1,000 feet is proposed for fens and reservoirs (including Antero, Spinney and 11-Mile Reservoirs).
- Withdrawal of land within proposed and existing ACECs.

Organization1:Friends of Browns Canyon's

Commenter1:Keith Baker

Comment Excerpt Text:

BLM should not make any lands available for disposal that have conservation, recreation or other values that benefit the national interest by retaining them in public ownership.

B.1.24. General Minerals and Energy

B.1.24.1. General Minerals and Energy - Alternatives

Total Number of Comments: 21

Summary

The BLM should manage or restrict mineral and energy development in the planning area to protect and mitigate impacts on the plant, wildlife, air, and water resources. The RMP should consider the following:

- siting energy development to avoid wildlife habitat fragmentation
- implementing specific buffers to protect high-quality fisheries, designated cutthroat trout habitat, aquatic habitat conservation, and recovery waters for rare eastern Colorado species and fens, wetlands, and riparian corridors
- monitoring impacts on special status species and state species of concern, big game habitat (migration corridors, winter range, and parturition areas), and ground-nesting birds' breeding and nesting areas
- timing project construction and drilling to conclude prior to the start of big game hunting season to avoid conflicts with hunters and vehicle traffic

- monitoring air and water quality to assess impacts
- applying NSO stipulations to mineral development on CPW-managed conservation easements
- assessing possible intersections between Colorado Natural Areas with federal mineral estate and applying appropriate project restrictions to protect the area, such as NSO stipulations, pre-construction surveys, buffers, and seasonal timing restrictions
- consulting with CPW at least 30 days prior to initiating project activities on State Trust Lands

The BLM should limit or prohibit the use of hydraulic fracturing. The BLM should focus energy development management on renewable energy. The BLM should identify areas or zones that are appropriate for wind energy development (similar to Solar Energy Zones) by using the process established in the Western Solar Plan.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Commenter1:Diane Rehner

Comment Excerpt Text:

Colorado has renewable power sources which do NOT jeopardize all that fracking does. This one isn't hard. Say yes to a healthy future for all, not the financial gain of a few who likely don't even live here.

Commenter1:Janice Sacherer

Comment Excerpt Text:

Spills, accidents, leaks, the disposal of toxic fracking waste mean the contamination of Colorado's water and land are inevitable. The industry might even cause earthquakes as it has in Oklahoma. Forget the quick money offered by fracking and invest in sustainable energy on public lands instead.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Understanding that minerals development and energy production will be a part of the resource management within the ECRMP boundary, CPW requests that core habitats be maintained in all available alternatives for future resource management.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW has not yet completed a detailed GIS analysis of the Federal mineral estate and CPW managed conservation easements and State Trust Lands with hunting and fishing access, but we anticipate numerous intersect ions of these lands with the Federal mineral estate for the ECRMP.

CPW requests "No Surface Occupancy" for energy or mineral development that must occur in areas intersected by CPW managed conservation easements. CPW requests that in order to avoid conflicts between wildlife recreation and energy or mineral development on State Trust Lands that lessees consult with CPW at least 30-days prior to initiation of development and recommends that construction and drilling activities be completed prior to the start of big game season - generally August 15th to avoid conflicts with hunters and vehicle traffic.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends the ECRMP include identification of specific buffers needed during minerals development and energy development for protection of quality fisheries, designated cutthroat t rout habitat, aquatic habitat conservation & recovery waters for rare eastern plains species, and high value fens, wetlands, or riparian corridors; particularly in light of flood related impacts experienced in Eastern Colorado during 2013 and 2015.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW is concerned that BLM resources be managed to avoid, minimize, or mitigate impacts to sensitive wildlife habitats and species including species of concern as well as Federal and/or State listed species, big game wildlife (migration corridors, winter range, parturition areas), breeding and nesting habitats for sensitive ground-nesting birds, and nests of raptors sensitive to development in order to prevent loss of habitat or fragmentation of habitat.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW is concerned that energy and minerals development within the boundaries of the ECRMP be developed, implemented, and monitored in such a way as to ensure that a) populations of threatened and endangered species are preserved or increased, b) existing habitat is preserved and enhanced to ensure diversity and abundance of wildlife, and c) existing habitat is managed to preserve and increase wildlife and fisheries populations of high social, economic, or scientific value.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

There are a total of 16 Colorado State Parks, administered by CPW, which occur within CPW's Northeast and Southeast Regions, and which are intersected by Federal mineral estate. CPW requests No Surface Occupancy plus 0.25- mile buffer for these properties.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

There are a total of 65 Colorado Natural Areas, administered by CPW, which occur within CPW's Northeast and Southeast Regions. These areas contain significant biological features including sensitive wildlife habitat, rare plants, and unique plant communities that are of statewide significance. CPW recommends the EIS include an assessment to identify whether any of these 65 natural areas are intersected by the Federal mineral estate for ECRMP, and if so, what measures are needed to protect the surface resources. CPW prefers a "no surface occupancy" stipulation for mineral leases intersecting these sensitive and high value areas. In cases where a "no surface occupancy" stipulation is not possible, we may recommend pre-construction surveys, buffers, and seasonal timing restrictions depending on the species involved. CPW can assist in the evaluation of which Colorado Natural Areas are intersected by the Federal mineral estate and recommendation of appropriate protection measures.

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

1. Disposal of Federal Mineral Acres: The Analysis of the Management Situation for the Eastern Colorado Resource Management Plan dated June, 2015 (hereinafter referred to as the “2015 AMS”) states that of the 6.6 million acres of federal mineral estate managed by the RGFO, 2.679 million of those mineral acres are under local government, private, and State lands. While BLM is planning to consider land tenure adjustments, CICA encourages BLM to undergo a much more extensive analysis of the need to dispose of the millions of mineral acres it owns under private lands.

a. Considering the fact that the debt of the United States has reached $18.5 trillion, there is no better time than the present for the BLM to pursue the transfer of a substantial portion of its mineral acres to private ownership. It is undeniable that the BLM could more properly manage 4 million mineral acres with its current and expected future budget restraints than it can manage 6.6 million mineral acres.

b. BLM should take a hard look at the potential impacts and benefits to the local and state economies if even one million acres of its mineral estate under private lands were transferred to private ownership. Energy development is on an upward swing all across the eastern slope of Colorado. BLM needs to consider how its ownership of millions of acres under private lands affects the local and state economies.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County recommends the following to protect public health and the environment, as related to any mining, renewable energy, or other significant project on BLM lands in Park County:

Baseline and ongoing monitoring for air quality and water quality, with Park County

involved in planning and receiving results

Commenter1:Kristin Skoog

Comment Excerpt Text:

Extractive industries such as surface mining, oil and gas, and timbering for commercial purposes should be prohibited

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

As the Department of the Interior moves forward to achieve the President's goal of permitting 20,000 megawatts of renewable energy on our public lands by 2020, BLM should continue to advance responsible renewable energy siting in a manner that avoids, minimizes and mitigates impacts on natural resources.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

We encourage BLM to conceive and evaluate mechanisms in this RMP to set up successful, low-conflict renewable energy projects and bring that energy to market. Given the unique challenges in the Royal Gorge Field Office, including land ownership patterns, and unknowns about future scenarios for renewable energy development on the Front Range, BLM may need to commit to and set frameworks for subsequent renewable energy planning in this RMP. BLM should ensure subsequent renewable energy and transmission planning includes public input opportunities.

Furthermore, BLM should continue working with the National Renewable Energy Laboratory, and other research and policy centers, to understand renewable energy resources and future development scenarios. BLM should facilitate educating the public on complex technical analyses that are informing development of the Eastern Colorado RMP.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In the Eastern Colorado RMP, BLM should utilize these resources to guide wind energy development to low-conflict areas with high probability of success by identifying focus areas for development, additional lands that may be available for wind development, and exclusion areas.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In the Eastern Colorado RMP, BLM should build upon that initial analysis to identify specific focus areas for wind energy development (similar to BLM's Solar Energy Zones) that have high resource potential, low conflict with other resources and access to transmission and other qualities that make them desirable to developers. BLM should incentivize wind testing applications and development in the focus areas.

BLM should ensure adequate stakeholder engagement in identifying wind focus areas so that the focus areas are ultimately successful in facilitating wind energy deployment. BLM should use the process established in the Western Solar Plan to designate appropriate focus areas, including: 1) assessing the demand for wind energy development (such as through an RFD); 2) establishing technical and economic suitability criteria; 3) applying environmental, cultural and other screening criteria; and 4) conducting NEPA analysis of the focus areas through the RMP process.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

As part of this process, BLM should consider hosting and/or participating in a workshop or stakeholder process with wind developers, utilities, conservation groups, sportsmen, local communities and other stakeholders to identify potential focus areas. NREL may also be a good host or partner for this type of process given the modeling and other research it is completing in Colorado. BLM should identify a range of alternatives for draft focus areas, such as "Wind Energy Study Areas," in the draft RMP, and could designate "Wind Energy Zones," "Designated Wind Leasing Areas" or some other appropriate type of focus area in the final RMP. The focus areas should be subject to robust environmental analysis in the RMP and/or other NEPA process so that a certain amount of tiering can occur and projects are incentivized in the focus areas. We reiterate that the process of identifying focus areas should include additional public involvement beyond comment periods provided on RMP alternatives. It must include an ongoing conversation with stakeholders to ensure focus areas avoid important conflicts and are desirable to developers. This process would be an excellent outreach opportunity between the formal close of scoping and the issuance of a draft RMP, providing sufficient time to gather information, conduct analysis and incorporate results into the draft RMP.

BLM should explore a two-phase approach to leasing within wind focus areas after they have been designated to address the need for site-specific wind data and wildlife monitoring before full leasing. In short, this approach would have a first phase in which BLM would hold a competitive offering for shortterm leases for site-specific meteorological and other testing and wildlife monitoring within a focus area and a second phase in which the short-term lease holder would be granted, barring any significant new information about wildlife or other conflicts, the preferred right to enter into a non-competitive project proposal and development phase subject to the same terms and conditions proposed in the draft rule for DLAs and other BLM policies. In this case, the information provided by the NREL study and other ongoing analyses in the region may help reduce the amount of site-specific meteorological testing that is necessary in the first phase of leasing.

We recommend that focus areas for wind energy development meet the following criteria:

- Generally relatively large areas that provide highly suitable locations for utility-scale wind development
- Locations where wind development is economically and technically feasible
- Good potential for connecting new electricity-generating plants to the transmission distribution system
- Generally low resource conflict

As a starting point for screens for potential focus areas, and recognizing that some impacts from wind development are different than for solar, BLM should look to the Western Solar Plan, which designated SEZs, and BLM Arizona's Restoration Design Energy Project, which identified Renewable Energy Development Areas for both wind and solar development.[20] In addition, BLM identified additional screens for refining the variance areas in the Desert Renewable Energy Conservation Plan; these screens are included as Attachment A.4, and should be used to help identify focus areas.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should identify variance lands for wind energy development in the Eastern Colorado RMP. BLM should use the concepts and screening criteria in the Western Solar Plan as a foundation for identifying variance lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should use the screening criteria set forth in the Western Solar Plan as a minimum for identifying solar emphasis areas. BLM should also consider potentially identifying potential mixed ownership development areas as was done in BLM's West Chocolate Mountains Renewable Energy Evaluation Area effort in California and BLM's Restoration Design Energy Project in Arizona.

Recommendations: BLM should identify innovative opportunities to promote smart solar energy development in the Royal Gorge Field Office, such as allocating "solar emphasis areas" which are low conflict and may be appropriate for projects smaller than 20 MW, as well as identifying potential mixed ownership development areas.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Given the factors described above that indicate that there are unlikely to be BLM-only parcels of land that are of sufficient size and low-conflict nature to be appropriate for designation as new Solar Energy Zones, BLM should focus on other mechanisms for promoting smart solar energy planning in the Eastern Colorado RMP. If BLM considers designating new Solar Energy Zones in the RMP, it must follow the protocol set forth in the Western Solar Plan.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Western Solar Plan is focused on guiding projects to low-conflict zones, so variance applications should be the exception, not the rule, and require robust environmental analysis. In the Eastern Colorado RMP, BLM should take the opportunity to refine variance lands based on the RFD we recommend BLM develop and to prevent impacts to sensitive resources.

B.1.24.2. General Minerals and Energy - Baseline Affected Environment

Total Number of Comments: 6

Summary

The size of the federal mineral estate in the planning area significantly exceeds that of the federal surface estate. In some portions of the planning area, the federal mineral estate is heavily concentrated, while in other areas it is highly fragmented and dispersed. The EIS should include GIS analysis and mapping to show the full extent and exact location of the federal mineral estate and other energy potential so that coordination with other uses of federal, state, and private surface estates can be coordinated. Commenters also noted the challenge surface conservation easements can present to the development of the subsurface federal mineral estate. The RMP should incorporate and safeguard future access to Federal minerals beneath privately held lands.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

The RFD Scenario that projects the anticipated level of mineral, renewable and nonrenewable energy development would provide the framework to base cumulative impact analyses, from which potential impacts to air quality and AQRV s, and other resources and issues of concern listed below, can be determined and used to develop an adaptive management approach to apply mitigation measures at the leasing stage. Such an approach would be preferable to considering whether to apply best management practices as conditions of approval at the application for permit stage which would be focused on individual or small-scale development proposals where mitigation could routinely be obviated.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW's review of the maps for BLM's Eastern Colorado RMP Planning Area indicate that the Federal mineral estate is approximately ten times the size of the Federal surface estate. Further, the Federal mineral estate is varied with some portions heavily concentrated while other portions are highly fragmented and dispersed.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW anticipates the need for an in-depth GIS analysis involving energy and minerals development as well as energy corridors, locations where Federal minerals are most likely to be developed, and overlap with wildlife habitat and use areas. CPW would like to discuss with BLM the details of how and when to conduct such analysis and access to appropriate shape files and wildlife data.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW requests that BLM identify in the ECRMP document the extent and magnitude of all existing as well as future renewable energy developments, non-renewable energy development, and energy/utility corridors within the boundaries of the ECRMP. Identification of renewable energy developments should include wind energy, solar energy, geothermal energy, and hydro-electric whether large or small-scale.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends the ECRMP EIS include a map showing the locations of all solid minerals (locatable and non-locatable) as well as fluid minerals. CPW also requests the ECRMP include a map layer or layers coincident with the Minerals Potential Report which show locations of existing mineral developments as well as anticipated mineral developments, and which can be used to inform assessment of direct, indirect, and cumulative impacts.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

Conservation easements pose a problem with privately owned surface land and inhibit access to public minerals beneath those lands due to the particular contract of non¬ development. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

B.1.24.3. General Minerals and Energy - Impacts

Total Number of Comments: 14

Summary

The EIS should analyze impacts on access to minerals.

The EIS should analyze impacts of exploration, construction, and development of minerals and energy projects, such as:

- providing a vector for the introduction of noxious weeds or invasive plants
- increasing traffic and congestion on roads
- negatively impacting air quality
- potentially releasing hazardous substances
- increasing greenhouse gas emissions
- expanding project-related development, such as roads and utilities
- negatively impacting scenic values and cultural landscapes
- increasing habitat fragmentation
- negatively impacting ACECs, WSAs, and lands with wilderness characteristics

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Noxious Weeds. The NPS units actively manage to control and/or eradicate classified noxious weeds as well as the spread of non-native invasive plants. Construction, exploration, development and associated mineral and energy development activities could provide a vector for the introduction of new noxious weeds or invasive plants into the NPS units.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Public Health and Safety. Construction, exploration, development and associated mineral and energy development activities could have direct, indirect and cumulative impacts to the health and safety of people accessing the NPS units and related areas (employees, visitors, contractors, volunteers, etc.) through increasing traffic, effects to access roads, potential release and transport of contaminating or hazardous substances, and impacts to air quality.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Greenhouse Gas Emissions and Climate Change. Construction, exploration, development and associated mineral and energy development activities could increase greenhouse gas emission .

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Connected Developments. Mineral and energy development projects could include connected development such as roads and utilities. Utilities include transmission lines. Additional miles of transmission lines would increase wildland fire risk. Transmission lines also detract from scenic values and cultural landscapes. Large-scale clearing for transmission lines results in habitat fragmentation, influencing wildlife distributions and movements. Mitigation could include putting all transmission lines underground.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Visual Resources. The landscape in and around the NPS units and related areas is an important feature to the interpretation of the areas. Construction, exploration, development and associated mineral and energy development activities could adversely affect the surrounding visual landscape by introducing visual intrusions into the landscape settings that are mostly free of major disturbances.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Terrestrial and Aquatic Wildlife. Construction, exploration, development and associated mineral and energy development activities could adversely affect species and their habitats in the NPS units and related areas

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Public Access. Construction, exploration, development and associated mineral and energy development activities could cause increased use along access routes to the NPS units as well as create opportunities for expanding points of access where none currently exists.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Cultural Landscapes. A cultural landscape embraces more than one of the property types defined in the National Historic Preservation Act: districts, buildings, structures, sites, and objects and includes resources such as traditional cultural properties and archeological sites that may not be eligible for inclusion in the National Register of Historic Places. Construction, exploration, development and associated mineral and energy development activities could adversely affect the cultural landscapes in the NPS units and related areas.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW would like to highlight the importance of incorporating adaptive management and monitoring programs into the ECRMP to assess impacts of mineral development on the landscape. While adaptive management is an important component of managing the resources within the ECRMP, clearly defined pre-established parameters, including monitoring and precise triggering management actions are also necessary.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW also recognizes there will be solar and wind energy developments as well as utility and energy corridors taking place within the boundaries of the ECRMP; and suggests those uses and their corresponding impacts be evaluated from a landscape scale as well.

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

It is conceivable that Conservation Easement taken on privately-owned surface hnd could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

It is conceivable that Conservation Easements taken on privately-owned surface land could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard ftiture access to public minerals beneath privately held lands?

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM recognizes high wind energy potential along the Mosquito Range, Reinecker Ridge, Waugh Mountain, Black Mountain, Deer Haven, Crampton Mountain, Arkansas Valley, and Phantom Canyon. Eastern Colorado RMP AMS at 184. The ridgetop-style development that would be required for consistent energy production in these locations would likely have serious impacts on wildlife and viewsheds. Moreover, many of these places are within or in close proximity to special designations such as Areas of Critical Environmental Concern and Wilderness Study Areas and are included in both citizen and BLM lands with wilderness characteristics inventory. Lands with wilderness characteristics are unsuitable places for wind development. Regardless of whether BLM protectively manages an area for wilderness characteristics, all BLM-identified lands with wilderness characteristics should be excluded from wind development.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

One particularly important resource BLM should protect from impacts of energy development is lands with wilderness characteristics. Because of the important resources and values that are present on lands with wilderness characteristics, BLM should not allow solar energy development in lands the agency has identified as containing wilderness characteristics, regardless of whether or not those lands are managed by BLM for the protection of their wilderness characteristics in the RMP. BLM's Western Solar Plan acknowledges that solar energy development is inappropriate for wilderness-quality lands by excluding all lands which BLM is managing to protect wilderness characteristics from solar energy development and committing BLM to siting, designing and constructing solar projects to avoid, minimize and mitigate impacts to all lands with wilderness characteristics, regardless of whether the agency has decided to manage them for protection. Western Solar Plan ROD pp. 54-56. Given the agency's commitment to avoiding impacts to wilderness-quality lands, BLM should exclude renewable energy development from land containing wilderness characteristics in the Eastern Colorado RMP.

B.1.25. Fluid Minerals - Oil and Gas

B.1.25.1. Fluid Minerals - Oil and Gas - Master Leasing Plans

Total Number of Comments: 52

Summary

The BLM should consider including these actions and stipulations in the South Park Master Leasing Plan:

- Apply protections (closed to leasing or NSO stipulation) around Reinecker Ridge
- Cose to leasing the entire South Park MLP area
- Apply 300-foot or 500-foot NSO setbacks from all surface waters
- Apply 0.50-mile NSO setback from Gold Medal designated trout fishing waters
- Apply 0.25-mile NSO setback from non-Gold Medal designated trout fishing waters
- Apply 100-foot NSO setback around ephemeral drainages
- Prohibit pipelines through wetlands and/or fens
- Prohibit dust suppression near riparian corridors
- Require groundwater monitoring and monitoring plans
- Close to leasing a set area around groundwater drinking water wells
- Prohibit reinjection, water discharge, and evaporation ponds
- Require water management plans
- Require recycling of produced water and fluids used in hydraulic fracturing
- Prohibit drilling on steep (greater than 25 percent) slopes
- Prohibit drilling on sensitive soils
- Require use of closed loop drilling methods only
- Develop disturbance caps that must be implemented
- Require phased leasing and phased development
- Require air quality monitoring and monitoring plans
- Require use of multiple well casings
- Require consolidation of facilities and infrastructure
- Allocate NSO or no leasing near communities, unroaded back country, and other high-value areas as defined by communities and natural resource specialists
- Define the transportation network, including identified haul routes and access provisions in the MLP, and require industry transportation network planning as part of Master Development Plans
- Require noise-reduction measures (e.g., mufflers)
- Require operators to submit Master Development Plans and be partners in the Natural Gas STAR Program

- Include compensatory mitigation measures
- Include requirements for operators to use BLM's wildlife BMPs
- Do not allow waivers, modifications, and exceptions on any stipulations
- Require a setback from all conservation easements
- Require the use of vegetation mats on drilling locations
- Require revegetation and reclamation with native species
- Close to leasing or apply NSO stipulations in elk and deer winter concentration areas
- Apply NSO stipulations around bighorn sheep habitat
- Apply 300-foot NSO stipulations around active mountain plover nests
- Apply 0.25-mile NSO stipulations around raptor nests from February 1 to August 15 without waiver, modification, or exception

  When writing the MLP, the BLM should follow all requirements in the BLM's MLP guidance and policy; the BLM should:

- Define the MLP vision, resource condition objective, and resource protection measures (like those above)
- Include a map of the defined MLP boundary
- Describe the important resource values within the MLP boundary
- Include maps of area fault lines, Clean Water Act impaired/threatened waterbody segments, municipal watersheds and designated source water protection zones, steep slopes and fragile/erodible soils, all aquifers in the area with a notation for Underground Sources of Drinking Water, and the aquifers that supply public drinking water and contain less than 10,000 TDS
- Include analysis and discussion of current ground and surface water conditions and sediment loads for waterbodies
- Identify threatened and endangered species and CPW species that occur in the MLP area

The RMP/EIS's purpose and need statement should also include a specific reference to the purpose of and need for the MLP.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Commenter1:Sean Ryan

Comment Excerpt Text:

Please follow through with energy leasing reforms, including a thorough Master Leasing Plan in South Park, to ensure responsible energy development.

Organization1:National Wildlife Federation

Comment Excerpt Text:

Below is a list of measures I think should be part of the South Park Master Leasing Plan that will safeguard our communities, our water and our livelihoods.

- 500 foot-setback for surface disturbance from all surface waters.
- One-half-mile setback for surface disturbance for all gold medal designated waters.
- No reinjection of water in South Park due to the vast complex of aquifers found under nearly the entire area, and the potential for contamination.
- Groundwater monitoring before, during and after drilling to ensure that no contaminated water is migrating into aquifers.
- No drilling on steep slopes or in areas with sensitive soils.
- Closed loop drilling systems (no open pits).
- Defined haul routes for vehicles carrying toxic materials and/or energy development related equipment.
- Phased development (development in one distinct area at a time, with reclamation requirements before advancement to additional areas).
- Disturbance caps, i.e., only a small percentage of land should be under development at any given time.
- Consolidation of facilities, pipelines and staging areas, and reduction of land disturbance to the greatest extent possible.
- Certain areas should be set aside where no drilling will occur. Examples: near communities, unroaded backcountry areas such as Reinecker Ridge, and other high value areas identified by the communities and natural resource professionals.

Organization1:Western Values Project

Comment Excerpt Text:

The South Park Basin is known for its hunting, fishing and wildlife, but more improtantly its streams and rivers are the source of nearly 40 percent of the Denver metro area's water supply.

The BLM should adopt develop a Master Leasing Plan that protects wildlfie habitat at Reinecker Ridge, ensure strong setbacks from rivers and drinking water reservoirs, benefits the local outdoor recreation economy and ensures oil and gas development is done responsibily.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

South Park is a National Heritage Area, "designated by Congress as places where natural, cultural, and historic resources combine to form a cohesive, nationally important landscape.

Through their resources, Heritage Areas tell nationally important stories that celebrate our nation's diverse heritage. Heritage Areas are lived-in landscapes (emphasis added)." (http://www.southparkheritage.org/about-spnha) Because your agency is required to develop a master leasing plan for South Park, should its conclusion be to permit drilling for oil and gas, or mineral extraction, on land that that was intended to be preserved as a National Heritage Area? We think not. In particular, Thousand Peaks Ranch is comprised of tracts that were part of Homestead land grants, and have essentially been used for agricultural purposes for more than 150 years. When thinking of what to do with the Thousand Peaks Ranch and similar areas, we urge you to think not of what your powers might be to allow oil, gas or mineral exploration, but to consider whether that is the correct thing to allow, when our property is the very essence of what the National Heritage area was intended to embrace.

Commenter1:Sharon Hale

Comment Excerpt Text:

Additionally, I support a South Park Master Leasing Plan that protects Reinecker Ridge and other public lands in South Park. Utilizing regulations such as no surface occupancy, phased leasing, and mandatory best practices will allow for responsible oil and gas development to occur while also protecting important resources associated with outdoor recreation, wildlife habitat, and water quality

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

To protect these wildlife resources, and the recreational experiences they support, we recommend that the MLP:

·Close the Reinecker Ridge area to oil and gas leasing, as this area provides key and critical habitat to a diverse range of species;

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

Lastly, in addition to the protections listed above, we recommend that the ECO FO carefully review and comply with the MLP requirements laid out in Chapter V of Handbook H-1624-1. Most importantly, the South Park MLP should clearly and expressly incorporate a “vision” statement, “resource condition objectives”, and “resource protection measures” into the broader Draft RMP planning documents. Based on our familiarity with other MLPs, including these key elements in the South Park MLP will help ensure that all of the important resources in the planning area are accounted for and adequately protected.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County recommends that oil and natural gas companies operating in the MLP area

are partners of the Natural Gas STAR program.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Land Surface Disturbance/Soils/Vegetation

Park County recommends:

- Identification of federal and state special status and Threatened and Endangered species (both flora and fauna), and mitigation to protect these species.
- Use of a Master Development Plan (MDP) for South Park projects that the County would help develop with BLM and other cooperating agencies. This could include a master drilling plan, master surface use plan of operations, a water management plan, a pest management plan for weeds, cultural report, biological survey, etc. It would include all the wells, roads, pipelines, flow lines, utility corridors, production facilities, compressor stations, water use, and water disposal facilities associated with the project. A MDP should be required for all oil and gas development, including exploratory drilling, and should be done through a NEPA process to allow for public participation.
- Evaluation of erosion and sedimentation impacts, and mitigation associated with surface disturbance due to roads, well pads, drilling and completion, and pipelines.
- Phased leasing and development. The County prefers that numerous sites are not open at one time within one unit.
- Reclamation before another unit can be permitted.
- Clustered development to minimize surface disturbance and visual impacts. Minimize the number of pads and use a high number of wells per pad to reduce the disturbance footprint and infrastructure needs.
- Centralized collection facilities.
- Required use of mats at drilling pads and other areas as needed, due to difficulty with revegetation. The montane grasslands in South Park have thin topsoil, a short growing season, and exist in an extreme climate. Reclamation of pads, roads, production facilities and pipeline areas is of concern.
- Minimize road construction. New roads should be two-track only and reclaimed as soon as possible.
- NSO (no waivers, exceptions or modifications) on steep slopes (over 25%).
- Revegetation with native species will be required.
- Park County will require as part of the County drilling permit a weed management plan for the management and prevention of noxious weeds .

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Surface Disturbance Caps

BLM should consider caps on the total percentage of land that can be disturbed at a given time within the South Park MLP area (similar to the Dinosaur Trail MLP). This will help reduce impacts to land, vegetation and wildlife.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Water Resources

The Upper South Platte watershed is a 2,600-square-mile watershed that reaches from the Continental Divide to Strontia Springs Reservoir, southwest of Denver. The watershed supports many uses including recreation, Gold-Medal fisheries, wildlife, and drinking water supply reservoirs. The headwaters of the Upper South Platte watershed contains five major municipal supply reservoirs, including Antero, Spinney Mountain, Eleven Mile, Cheeseman, Strontia Springs and several other small reservoirs. These reservoirs supply drinking water to approximately one third of Colorado's residents; therefore the following comments provide recommendations to protect these critical water resources.

The MLP should analyze potential impacts to surface water and groundwater quality from drilling, leaks and spills, produced water management, underground injection wells, evaporation ponds, wellbore integrity problems and pipeline use. Mitigation to minimize impacts should be required.

Per the Park County Oil and Gas regulations, oil and gas companies will be required to identify all water bodies within a three-mile radius of the proposed oil and gas operation, and provide a description of existing water quality for both surface and groundwater sources within three miles of the oil and gas operation. The regulations also require a drainage and erosion control plan. BLM should also require operators to address drainage and erosion control.

The MLP should require that future projects include a water resource monitoring plan for surface water and ground water (water levels and water quality, pre-drilling, during drilling and post-drilling). This will track impacts as drilling and production occur and ensure BMPs are mitigating impacts. This should include baseline and long-term monitoring for private wells.

The MLP should require a water management plan that details the sources and quantities of fresh water required for drilling, management on-site, and waste water treatment or disposal. This should include:

Anticipated water demand for the project.

Sources of water for the project (surface water or ground water).

Potential impacts of water withdrawals (e.g., drawdown of aquifer water levels, impact on water supply wells, reductions to instream flow, impacts on aquatic life, wetlands and other aquatic resources).

The Plan should cover how flow back and produced water will be managed, including estimated volumes, management options, and impacts.

The County strongly recommends that operators be required by BLM to treat and recycle produced water for use in well drilling and stimulation, to reduce the need for fresh water withdrawals and produced water management/disposal facilities.

The County strongly recommends no discharge of produced water to surface water, including use of evaporation ponds.

The MLP should also evaluate the direct, indirect, and cumulative impacts of wastewater injection wells and provide mitigation measures. Park County strongly recommends that no wastewater injection wells be allowed within the MLP boundary, due to the presence of complex geology, multiple faults and highly fractured zones, important drinking water aquifers and the potential for induced seismic activity (based on USGS research on induced earthquakes at: http://earthquake.usgs.gov/research/induced/.

The use of mats and/or pad liners should be considered for enhanced spill containment and to prevent infiltration of contaminants.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Surface Water

The MLP should include the following:

- Description of the current water quality condition for each surface water body within the proposed boundary including intermittent, perennial, and ephemeral streams, lakes, rivers, reservoirs, and surface water sources.
- A map and list of Clean Water Act impaired or threatened water body segments, including designated uses and specific pollutants.
- A map of municipal watersheds and designated source water protection zones.
- Maps and descriptions of topography and soils, specifically steep slopes and fragile or erodible soils, especially near surface waters and intermittent or ephemeral channels.
- Consider a sediment load analysis since impaired streams in South Park are impacted by sediment.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Ground Water

The potential and existing groundwater use, coupled with expected development, make it important to characterize the groundwater resources within the MLP area. Park County has funded several groundwater studies and will provide these reports to BLM.

The MLP should include the following:

A description of all aquifers in the MLP area, noting which aquifers are Underground Sources of Drinking Water (USDW), Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof:

- Which supplies any public water system
- Which contains a sufficient quantity of groundwater to supply a public water system
- Currently supplies drinking water for human consumption
- Contains fewer than 10,000 mg/l total dissolved solids
- Which is not an exempted aquifer (see CFR Section 144.3)

A summary of available water quality and water yield information for each aquifer and any trends. Specific attention shall be made with respect to naturally occurring radioactive materials (NORM) such as uranium and radon.

Maps depicting the locations of sensitive groundwater resources such as municipal watersheds, source water protection zones, sensitive aquifers, recharge areas, and important groundwater surface water interaction zones such as fens and other types of wetlands.

Description and map of faults in the area.

Description of and locations of groundwater use including public water supply wells, domestic wells, springs, and agricultural and stock wells.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Comment Summary:

Baseline and ongoing monitoring for air quality and water quality, with Park County involved in planning and receiving results

Requirement for closed loop systems, no open pits, and green completions, per Park County regulations

Use of multiple well casings during drilling and well completion to protect all freshwater aquifers

Strong recommendation that no wastewater injection wells be allowed within the MLP boundary, due to the presence of complex geology, multiple faults and highly fractured zones, important drinking water aquifers, and the potential for induced seismic activity.

Phased leasing and phased development

Use of a Master Development Plan (MDP) for South Park projects that the County would help develop with BLM and other cooperating agencies. An MDP should be required for all oil and gas development, including exploratory drilling, and should be done through a NEPA process to allow for public participation.

Clustered development to minimize surface disturbance and visual impacts

Use of matting to reduce site disturbance

Centralized collection facilities

Strong recommendation for water reuse/recycling to minimize the impact on fresh water resources

Potential use of oil and gas impact fees to address possible impacts

No Surface Occupancy (NSO) stipulations as supported by all organizations signing this letter and most participants in the MLP Stakeholder meetings, as described in the detailed comments below. These stipulations include a recommendation for a ½-mile NSO setback for Gold Medal Waters and a 500-foot NSO setback for all other water resources.

Park County is interested in exploring with BLM the use of No Leasing decisions and stipulations to provide special protection for wildlife, as part of a balanced approach to management.

The proposed MLP boundary presented in Figure 1 encompasses 526,805 acres situated in the center of Park County. This area fully encompasses all primary drinking water reservoirs and the boundary has been vetted and supported by the MLP stakeholder group.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Wetlands

Sensitive and unique water resources, including playa wetlands and fens, exist in the MLP area, and merit special consideration. Park County recommends that the MLP present inventories and maps of existing wetlands and waters of the U.S. The inventory should include information on acreages and channel lengths, habitat types, conditions and functions of these waters. Recent Colorado Natural Heritage Program (CNHP) mapping will be an important part of this inventory.

Contact CNHP for the most up to date maps.

Park County recommends updating existing stipulation CO-28. This is a CSU stipulation to protect perennial water impoundments and streams, and/or riparian/wetland vegetation by moving oil and gas exploration and development beyond the riparian vegetation zone. This stipulation should be updated to the NSO recommended previously in this letter for protection of streams, riparian and wetland areas.

Park County supports the use of existing stipulation RG-18 (NSO to protect fen resources, South Park Plan amendment), with potential modifications based on cooperating agency discussions.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Fisheries and Wildlife Resources

The County's goal is to protect intact large areas of currently unfragmented, undisturbed wildlife habitat. All development and production activities should be phased and concentrate to minimize disturbance or displacement of wildlife.

Park County recommends the following:

All stipulations and BMPs should have no waivers or modifications. As to Exceptions, to ensure proper management, the Authorized Officer could grant an exception to an oil and gas lease NSO stipulation only where the proposed action:

(i) Would be the preferable course of action to meet the goals and objectives of the South Park MLP; or,

(ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear net conservation gain to priority wildlife habitat.

Exceptions to this lease stipulation based on (i) above should be granted only after consultation with Park County, affected landowners and Colorado Parks and Wildlife. Exceptions should be granted only where allowing surface occupancy at a specific site within the lease parcel would better achieve the goals and objectives of the MLP than siting surface occupancy elsewhere. Exceptions based on (ii) should be granted only after consultation with Colorado Parks and Wildlife and also should include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts. Approved Exceptions should be made publicly available at least quarterly.

The MLP should identify any federal and state special status or Threatened and Endangered species, and associated mitigation.

As presented previously apply a ½-mile NSO stipulation should be used (with no waivers, exceptions or modifications) for Gold Medal rivers/streams and reservoirs, including Spinney Mountain Reservoir.

As presented previously a 500-foot NSO stipulation with no waivers, exceptions or modifications should be used for all water bodies.

Park County supports those proposals brought to the MLP stakeholder group as presented in the final Keystone document by the Colorado Wildlife Federation, Trout Unlimited, Wild Connections, and others (see Appendix 1).

Park County supports the Colorado Parks and Wildlife updated BMP document actions to minimize adverse impacts to wildlife resources (CPW 2012) 7 unless those actions are less restrictive than proposals in this document.

The existing stipulations related to wildlife identified in the RGFO RMP and the South Park Plan Amendment should be modified as needed and applied to BLM lands within the proposed MLP area7

Timing Limitation requirements for any necessary construction near river courses should be used to avoid critical spawning times.6

BLM should evaluate (in conjunction with CPW) the presence of, and opportunity to restore, native trout within the planning area. Those streams that are found to contain native trout or that are suitable for restoring populations of native trout should be afforded a ¼ mile NSO protection for cutthroat trout bearing streams and/or streams identified for reintroduction for cutthroat trout.

Use of Wildlife Management BMPs presented in the Internet link below, to reduce habitat fragmentation, minimize surface disturbance and other impacts. Some of these BMPs are:

Reduced size of roads and well pads, interim reclamation, use of native species for reclamation, bury pipes and power next to roads, multiple wells from same pad, reduce noise and traffic, centralized production facilities, remote production monitoring, minimize noise.

http://www.blm.gov/style/medialib/blm/wo/MINERALS__REALTY__AND_R

ESOURCE_PROTECTION_/bmps.Par.97783.File.dat/WO1_WildlifeMgmt_BMP

s_Slideshow.pdf

Noise generating activities should be minimized through the application of BMPs such as use of high efficiency mufflers and other techniques and designs to help reduce impacts to wildlife habitat.

6 A compiled list of existing RGFO stipulations are in Attachment 2.

7 CPW (2012), Colorado Parks and Wildlife BMPs

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Specific Recommended Wildlife Stipulations

Recommendations have been separated into a small amount of acres as No Surface Occupancy and acreage designated as enhanced best management practices (BMPs). The term Enhanced BMPs is intended to mean that BMPs in CPW (2012) are required rather than voluntary, subject to “exceptions,” defined above. Other areas of wildlife habitat in South Park are not listed below as the BMPs are negotiated rather than required. All acres presented below represent BLM subsurface acres, however some surface acres overlay these subsurface acres.

Elk - No Leasing area; Deer – No Leasing area

Stipulation: This area is an elk winter concentration area. A portion of this area is also deer severe winter range and winter concentration area. This area also serves as a migration corridor for elk and deer to move between winter and summer range.

Purpose: To avoid oil and gas activities within mule deer severe winter range, elk winter concentration areas, production areas and migration corridor.

Area: 4,392 acres. This area is located approximately four miles east of Fairplay, CO and contiguous with the western portion of the James Mark Jones State Wildlife Area.

Elk – No Surface Occupancy areas

Stipulation: These areas are elk winter concentration areas.

Purpose: To avoid oil and gas activities within elk winter concentration areas.

Areas: 3,806 acres including those BLM lands that border the James Mark Jones SWA to the east and west. These BLM lands are south of the No Lease area proposed above and 1,463 acres west of Highway 9 situated between Fourmile Creek to the west and the Middle Fork of the South Platte to the east. Total Acres proposed NSO for Elk 5,269.

Elk – Enhanced BMPs

Stipulation: These areas are elk winter concentration areas and production areas. Require adherence to Colorado Parks and Wildlife BMPs, (CPW 2012).

Purpose: To avoid or minimize surface disturbance within these areas of elk winter concentration and production.

Areas: Two different BLM tracts totaling 5,090 acres. These BLM parcels are located to the east and west of Park County Rd. 53 in the southern most portion of the proposed MLP boundary.

Pronghorn and Deer - Enhanced BMPs

Stipulation: These areas are pronghorn winter concentration areas and deer severe winter range and winter concentration areas. Require adherence to Colorado Parks and Wildlife BMPs (CPW 2012).

Purpose: To avoid or minimize surface disturbance within pronghorn winter concentration areas and these areas of deer severe winter range.

Area: 52,156 BLM subsurface acres within the proposed MLP boundary. This area generally lies to the south of Spinney and Eleven Mile Reservoirs and extends to the east and west of Hwy 9 and south of Hartsel.

Bighorn Sheep – No Surface Occupancy area

Stipulation: This area encompasses a critical winter range for a bighorn sheep herd.

Purpose: To avoid surface disturbance within bighorn sheep production and wintering areas.

Area: 455 acres. This area includes both BLM surface and subsurface acres located approximately 3 miles northwest of the Town of Fairplay along Hwy 285 and a small section that borders the northern edge of the MLP boundary.

Mountain Plover

Survey suitable nesting habitat within the known range of mountain plover that is proposed for development during the appropriate season. Flag active nests. No Surface Occupancy within 300 feet of active mountain plover nest sites until young are hatched and independent of nest. No Surface Occupancy for drilling and other construction activities, plugging, abandonment, and interim reclamation from April 10 through July 10.

Purpose: To avoid disruption of nesting mountain plover. Mountain plover is a Colorado Parks and Wildlife "species of concern."

Raptor Nests (Other than special status species)

Stipulation: This area encompasses the nests of raptors that are other than threatened, endangered or candidate species. No development activities are allowed within 0.25 mile of identified raptor nest sites from February 1 through August 15, or until fledgling and dispersal of young. (Development allowed from August 16 through January 31).

Purpose: To prevent disruptions of nesting raptors that may result in absences of adults sufficient to cause direct or indirect mortality of the eggs or young or the premature departure of young from the nest.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Heritage/Visual/Cultural/Paleontological

In recognition of the significant role cultural heritage plays in the long-term sustainability of Park County's communities, the county has taken significant steps to document and protect cultural resources throughout the county, including prehistoric and historical archaeological sites; historical mining, ranching, railroad, recreational, and water management resources; historic towns and settlements; and historic cemeteries and burials. Therefore, Park County requests that the Master Leasing Plan include provisions for the protection of significant paleontological and cultural resources, both known and unknown, located within the plan area.

Specifically, Park County recommends the following:

National Historic Preservation Act Section 106 compliance processes should be followed and adverse effects to significant cultural resources avoided or mitigated as specified in 36 CFR 800.

Potential lessees should be made aware of known cultural resources located within lease areas to encourage proactive planning that ensures significant cultural resources will not be adversely affected.

The MLP should not conflict with the goals established by the 2013 South Park National Heritage Area Management Plan.

All permits for work on leased lands should be referred to the Park County Department of Heritage, Tourism and Community Development for comment and all county permitting procedures related to the protection of cultural resources should be followed.

No Surface Occupancy (NSO) within local, state, or nationally designated historic districts including but not limited to the Tarryall Rural Historic Landscape District, and Threemile Gulch Archeological District.

Individual cultural properties eligible for or listed on the local, state, or national historic registers should be surrounded by an avoidance area sufficient to avoid adverse impacts, both physical and visual.

For all areas that have not been previously surveyed, a Class III cultural resources survey should be conducted by a qualified cultural resource professional prior to leasing. If cultural resources surveys identify areas with a high probability of encountering potentially significant sub-surface archaeological sites, a qualified archaeologist should monitor any ground disturbance activities.

If previously undetected paleontological or cultural resources are discovered during construction, all construction activities should be suspended, the State Historic Preservation Office and Park County immediately notified and the site protected from further damage or looting. Work should not proceed until paleontological materials or cultural resources are properly evaluated by a qualified paleontologist or archaeologist.

Lessees should inform their employees, contractors and subcontractors about all relevant federal, state, and local regulations intended to protect archaeological and cultural resources.

Additional information on Park County's cultural resources is available in the South Park National Heritage Area Management Plan (http://www.southparkheritage.org/management-plan), from the Colorado Office of Archaeology and Historic Preservation's COMPASS database (http://www.historycolorado.org/oahp/compass), and from the Park County Department of Heritage, Tourism and Community Development.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Transportation, Road Maintenance, Traffic

Park County will work with operators on transportation planning. The County requires, as part of the Oil and Gas permitting process, a roadway impact analysis.

All public access roads, under the jurisdiction of Park County, shall be constructed and maintained in compliance with the Park County Standard Specifications for Road and Bridge Construction, or otherwise as necessary to accommodate the traffic and equipment related to the Oil and Gas Operation and emergency vehicles.

Public Roadway and Traffic Impacts.

1. Ingress and egress. Ingress and egress points to public roads shall be located, maintained and improved to assure adequate capacity for efficient movement of existing and projected traffic volumes and to minimize traffic hazards.

2. Maintenance agreement or financial assurance. If the projected use of the public roads resulting from the Oil and Gas Operation will result in a need for an increase in roadway maintenance or snow removal, the County shall require the Operator to:

3. Enter into an agreement with the County whereby the Operator provides for private maintenance and snow removal, or reimburses the County for such increased costs; and/or

4. Provide a bond or other financial assurance in an amount acceptable to the County to cover the costs of impacts to the roads.

During the production phase, truck traffic should be reduced by encouraging well monitoring telemetry. This reduces truck trips, engine emissions, and methane emissions from gas pneumatic pumps.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Noise

Applicable noise rules include the following:

The Noise Control Ordinance of Park County (No. 12-01)

The State of Colorado COGCC Oil and Gas Rules addressing noise

The Colorado Noise Statute, § 25-12-103, Maximum permissible noise levels

The County would like to discuss with BLM the use of potential noise BMPs such as the following:

- Construction of noise barriers
- Control of exhaust noise from pump jacks and compressors so < 49dB at 30 feet from the source
- Compressor noise mitigation including muffling or housing engines in acoustically insulated structures, or housing the entire compressor in an acoustically insulated building

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Conservation Easement Protection

Park County has invested considerable resources to secure a number of conservation easements that protect natural, visual, agricultural, and recreational assets upon which the county economy depends. Conservation easements in Park County are held by the US Fish & Wildlife Service, Natural Resources Conservation Service, Colorado Open Lands, Colorado Cattlemen's Agricultural Land Trust, The Nature Conservancy, Mountain Area Land Trust, Continental Divide Land Trust, and Rocky Mountain Elk Foundation. Appropriate setbacks and protocols should be established to ensure that inherent conservation values are not compromised on or near lands held in conservation easement

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Infrastructure impacts

Park County recognizes that there may be impacts due to lodging, wastewater treatment of produced water, water supply for drilling, sewage, etc. The County will require permits for certain activities.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Oil and gas development operations have a high potential to impact air quality both within the designated leasing area and outside of the boundaries of the area. Park County recommends that the MLP include sufficient analysis of the current air quality conditions as well as the potential effects on air quality of future oil and gas activities.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Air quality monitoring is needed to support such an analysis and to identify and evaluate mitigation alternatives in the MLP. The scope of the air quality assessment should include the Clean Air Act criteria pollutants, hazardous air pollutants associated with oil and gas operations, and greenhouse gases. Park County recommends baseline air quality monitoring to characterize the current levels of the Clean Air Act "criteria pollutants" ozone, particulate matter (PM10 and PM2.5), carbon monoxide, nitrogen oxides, sulfur oxides, and lead. The measured levels should be compared to the National Ambient Air Quality Standards to assess the current baseline air quality.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Evaporation ponds are strongly discouraged based on air quality and water quality concerns.

In addition to those requirements of COGCC Rule 805 pertaining to odors and dust, Park County recommends that all condensate tanks with a potential to emit VOC's of >5 tons/year should utilize a control device capable of achieving 95% control efficiency of VOC's and shall hold a valid permit from the CDPHE.

It is recommended that venting not be permitted within the MLP area. Venting of wells emits Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) such as benzene, toluene, and xylene. Flaring natural gas is a better alternative than venting but combustion emissions include NOx, CO, VOCs, CO2 and PM2.5. Also flaring can create potential fire hazards and impacts to visibility (BLM1). Limited flaring (with stipulations or BMPs related to the timing and amount) may be necessary. During exploratory drilling where green completions

are not feasible, operators should be required to minimize the time period during which gases are emitted or flared and monitoring or recording the volume and time period of such emissions should be required.

Commenter1:Jean Smith

Comment Excerpt Text:

Master Leasing Plan

I support the concept of a Master Leasing Plan for South Park, and in particular endorse the specific recommendations made by the Park County Commissioners. As the headwaters of the South Platte River, South Park and its rich and varied ecosystems are a high priority for conservation

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

In regard to future oil and gas development, CPW continues to be concerned that mitigating impacts on a site-by-site and quarterly lease sale basis may not result in an effective conservation strategy over the long term. Therefore, we favor a landscape-level analysis and guidance that, in addition to identifying which parcels are available for future mineral development and under what stipulations, also addresses broader approaches such as phased or clustered development. We believe this should be an essential and critical component of the Master Leasing Plan for South Park.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

South Park Master Leasing Plan

- The BLM should include a map identifying the proposed geographic boundaries of the South Park Master Leasing Plan (SPMLP).

-CPW is concerned that the MLP for South Park be developed, implemented, and monitored in such a way as to ensure that a) populations of Federal and State threatened and endangered species and species of concern are preserved or increased, b) loss of habitat and fragmentation of habitat is avoided wherever possible, c) existing habitat is preserved and enhanced to ensure diversity and abundance of wildlife, and c) existing habitat is managed to preserve and increase wildlife and fisheries populations of high social, economic, or scientific value.

-CPW strongly prefers avoiding and/or minimizing oil and gas development impacts wherever possible. In addition, CPW requests that the SPMLP include details of compensatory mitigation for oil and gas development impacts that cannot be avoided or minimized.

-CPW recommends the SPMLP identify any federal and state special status or Threatened and Endangered species, and associated mitigation.

-Designation of specific areas as Areas of Critical Environmental Concern (ACEC). CPW recommends an assessment of the ACEC designation for the South Park Master Leasing Plan area to include, at a minimum, the following: crucial habitats for State and Federal listed species and species of concern, migration corridors for big game, big game winter habitats, quality fisheries, designated cutthroat trout habitat, and Colorado Natural Areas with high value fens, wetlands, or riparian corridors; and how these various areas will be protected during future management and/or development. Included in the assessment should be an identification of which specific areas should be off-limits to future mineral development. CPW anticipates being able to assist with such assessment, following scoping, to help identify areas of critical environmental concern. These may coincide with areas that should be off limits to future oil/gas development or at least no surface disturbance where mineral development is not compatible with the current surface use.

-CPW requests the following buffers for protection of quality fisheries and cutthroat trout designated critical habitat: "a 300 foot setback from the floodplain of any quality fishery and/or cutthroat trout designated critical habitat; and a 300 foot setback from the floodplain of any tributary to any quality fishery and/ or cutthroat trout designated critical habitat." As the flooding of 2015 has shown, the rivers in South Park are capable of migrating laterally significant distances within the floodplain in a relative short period of time. This lateral migration makes surface occupancy and surface disturbance infrastructure prone to flooding if they are based off of a buffer distance associated with the ordinary high water mark of the stream and not located out of the boundary of the floodplain. Protecting South Park's quality fisheries and cutthroat trout designated critical habitat, and their tributaries is of high importance.

-CPW is concerned that the SPMLP include identification of specific buffers adequate for protection of high value fens, wetlands, riparian corridors, and all other High Priority Aquatic Habitats.

-CPW recommends that the SPMLP identify additional leasing stipulations that are needed to assure adequate protections for State Parks and Wildlife resources and concerns (example: seasonal timing limitations and appropriate buffers to avoid critical spawning times). To assist with this concern, CPW has provided recommended stipulations for sensitive wildlife habitat s and species in Appendix C.

-CPW recommends that the SPMLP identify required Best Management Practices to be applied to each mineral lease. To assist with this concern, CPW has provided recommended Best Management Practices in Appendix D that we have used for oil and gas development throughout Colorado.

-CPW would like to work with the BLM to identify processes or methods for how CPW can be engaged in pre-disturbance discussions with BLM and/or surface owners for protection of parks and wildlife resources on split estate lands.

-CPW recommends the SPMLP include a fine-scaled roads analysis identifying existing primary and secondary roads throughout the SPMLP area to be used for oil and gas development, locations of additional temporary and permanent roads that will be needed for oil and gas development.

- CPW requests that the SPMLP include details of where, how, and when both phased as well as clustered development will occur.

-CPW recommends the SPMLP include a discussion of timeframes to be implemented for interim reclamation and weed control as well as final reclamation of all surface disturbance areas.

-CPW would like to work with BLM on conducting a gee-spatial analysis for High Priority Habitats following scoping. Such analysis may include a list and maps indentifying the location and extent of all known High Priority Habitats within the boundaries of the South Park Master Leasing Plan. This includes big game winter range, raptor nests, quality fisheries, mountain plover habitat, etc. The geo-spatial analysis will need to utilize existing shape files for existing as well as planned oil and gas development within South Park, and their overlap with wildlife habitat and use areas. Oil and gas development considerations include identification and gee-spatial analysis of existing oil & gas leases, including t hose that are due to expire and those which should be removed from future development; potential areas open for future oil and gas leasing; as well as existing and planned access roads.

-CPW recommends the SPMLP include maps and gee-spatial information identifying all known high value wetlands, perennial/intermittent/ephemeral stream reaches and their associated riparian corridors (CPW may be able to assist with some of this information).

-CPW recommends the SPMLP include development of a wildlife monitoring plan to ensure protection of sensitive wildlife habitats and species throughout all phases of development, including triggers which will indicate significant impacts and decision making protocol and process for making needed changes to approved Master Leasing Plan.

-CPW recommends the SPMLP include development of a water monitoring plan to ensure protection of water supply, water quality, and aquatic resources (wetlands and riparian corridors) and to be incorporated into an adaptive management program for the Master Leasing Plan for South Park. Should include discussion of data to be used to establish baseline water parameters, location of monitoring sites, frequency of ongoing water monitoring, triggers to indicate significant and undesirable impacts to water supply, water quality, and aquatic resources, and decision making protocol and process for making needed changes to approved Master Leasing Plan.

-CPW recommends that existing water quality within the boundaries of the South Park MLP be preserved or improved wherever possible and to the extent possible, particularly as it relates to oil and gas development leaks, spills, and tracking. Specifically, the SPMLP should identify and characterize water quality protections to be implemented for priority sport fisheries, wetlands and headwater streams and tributaries, and municipal water supply storage reservoirs.

Commenter1:Lauren Swain

Comment Excerpt Text:

I urge you to apply the no-leasing option under the Master Leasing Plan process to protect South Park's waterways and National Heritage Area from the inevitable toxic air and water pollution resulting from emissions, pits, spills, storage and transport of chemicals and wasteproducts that accompany modern drilling and fracking processes. Drilling in South Park would also create unacceptable visual blight and surface disturbances that would mar the beauty of the landscape and quality of wildlife habitat forever.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

We feel that these elements are critical for a successful MLP for the South Park portion of the planning area and hope that our suggestions assist the BLM to: 1) ensure that an adequate level of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Hunting and fishing generates more than $17 million in revenue annually in Park County, and contributes to the creation of more than 200 jobs. Thousands of hunters and anglers visit South Park each year to utilize the countless public land opportunities, and in particular, those recreation opportunities in the numerous State Wildlife Areas[5. Trout Unlimited understands the BLM does not have authority over State Lands. However, we do believe the BLM should limit impacts to these areas by assigning appropriate protection measures on adjacent BLM lands and water that flow into these areas, and to appropriately manage the development of federal minerals under these lands. BLM should also work to manage adjacent lands in concert with the State to ensure compatibility.] and along the Gold Medal streams. Protecting the integrity of these areas and the sustainable economic engine they support is integral and should be a chief goal of the South Park MLP.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

these comments aim to help define just what responsible energy development is for the South Park MLP in three ways:

1) Identify the suitability of lands for oil and natural gas development;

2) Highlight, through a combined analysis of fish and wildlife habitat values, regulatory direction, geological suitability, and quality of experience, those areas that are suitable for drilling, areas that require additional mitigation measures, and places that deserve to be set aside from oil and gas activities; and

3) Offer constructive input and supporting information to help guide development that does occur in a manner that balances uses through monitoring, mitigation, and enforcement.

Commenter1:Misi Ballard

Comment Excerpt Text:

South Park is unique landscape, as recognized by its U.S. Congressional designation as a National Heritage Area. This designation highlights the many natural, cultural and historic resources found here. With miles of Gold Medal fishing waters, state wildlife areas, rare fens, abundant wildlife, ancient cultural sites and the rural character of the area, we have much to protect and much to lose with the threats that oil and gas development pose.

Organization1:City of Aurora

Commenter1:Marshall Brown

Comment Excerpt Text:

ensure the MLP provides opportunities for responsible energy development while protecting the watershed and our current and future water resources

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

As one of the goals of Planning 2.0 is to provide additional opportunities for collaborative planning with the public, we ask that BLM offer public engagement opportunities before and at that key juncture to enable collaborative development of the MLP and RMP.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

The MLP should include a description of all aquifers in the MLP area, map of faults in the area, maps locating sensitive groundwater resources and their uses, and a summary of available water quality and water yield information for each aquifer, as well as trends.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

we reiterate our request that the MLP be allotted its own section in the body of the RMP revision, in addition to compliance with form requirements within respective RMP chapters. That is, the public must be able to read the MLP as a whole – without confusion. The MLP also should be referenced with specificity in the purpose and need statement of the RMP.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

The core of the MLP, the "resource condition objectives" and "resource protection measures," must be measurable (qualitative and/or quantitative, as applicable). To do so, it is necessary first to catalogue and discuss those resources and uses that may result in actual or reasonably foreseeable conflicts with oil and gas development. The resource condition objectives and effective resource protection measures must enable outcomes for the future of South Park, including: conservation and avoidance of damage (including cumulative impacts) to the irreplaceable fisheries, wildlife resources and drinking water quality, tourism and recreation, grazing, respect for the designation of South Park as a Natural Heritage Area, paleontological resources, and minimized "likely conflicts" among resources (and interests) in this unique, treasured area.

Organization1:Denver City Council

Commenter1:Jack Paterson

Comment Excerpt Text:

we would like to thank the Colorado State Office of the U.S. Bureau of Land Management for their commitment in pursuing a Master Leasing Plan to strike a balanced approach between energy development in the South Park Basin and protecting critical water resources and the environment for Park County and the Denver Metro Area.

Organization1:The Wilderness Society

Comment Excerpt Text:

The BLM has the opportunity to protect wild lands and wildlife from oil and gas drilling through a proactive plan called the South Park Master Leasing Plan. This is a good way for the BLM to use a new approach for well planned, responsible energy development. Development should be directed away from wild lands like Reinecker Ridge and important water resources and wildlife habitat in South Park.

Organization1:Conservation Colorado

Comment Excerpt Text:

Additionally, I support a South Park Master Leasing Plan that protects Reinecker Ridge and other public lands in South Park. Utilizing regulations such as no surface occupancy, phased leasing, and mandatory best practices will allow for responsible oil and gas development to occur while also protecting important resources associated with outdoor recreation, wildlife habitat, and water quality.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

Oil and gas development planning should be carried out on a broader, landscape level so that cumulative impacts can be properly assessed. For this reason, we support and encourage the use of Master Leasing Plans, such as the South Park Master Leasing Plan. It is critical that the BLM address certain issues particular to South Park, such as protection of Front Range water sources, its gold medal trout fisheries, its wildlife habitat and migration corridors, and its community values, on such a broad scale. We note that the RMP "envisioning" process gave the BLM the opportunity to solicit from the local community a vision of how South Park BLM lands and mineral resources should be managed. We hope that this vision will be embodied in both the MLP and the RMP

Commenter1:Dena Taylor

Comment Excerpt Text:

Please consider adding comments on the South Park Master Leasing Plan or other approaches toward better management.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must address and incorporate the South Park MLP throughout the Eastern Colorado RMP, including in the alternatives, affected environment and environmental consequences chapters. Additionally, in the alternatives chapter, the BLM must include alternative ways for implementing the MLP, and in the affected environment chapter, must specifically describe the important resources and values that are present in the South Park MLP. Finally, as a means of educating the public and providing clear direction for the RMP, BLM should include the South Park MLP in the purpose and need statement.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must develop and include a comprehensive “vision” statement for the South Park MLP in the Eastern Colorado RMP. BLM should use that “vision” to develop “resource condition objectives” and “resource protection measures” that will implement the “vision.” Further, we recommend that the “vision” for the South Park MLP should reflect the following principles:

-South Park contains a wide variety of sensitive, economically important resources that special consideration and heightened management, including drinking water supplies for Denver and other Front Range communities, critical big game habitat and coldwater fisheries.

-Oil and gas development in the planning area should be balanced against the protection of these other resources uses. See IM No. 2010-117 at p. 2 ("Under applicable laws a policies, there is not presumed preference for oil and gas development over other uses.").

-Where allowed, oil and gas development should be preconditioned with strong protections for other uses and resources in the planning area, including drinking water and fish and wildlife resources.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The "important resource values" in the South Park MLP planning area must be listed and described in the Affected Environment chapter of the Eastern Colorado RMP. More specifically, we recommend that drinking water sources, fisheries, wildlife habitat, wilderness quality lands, native plants, grasses and soils, and cultural and paleontological resources within the South Park MLP planning area be among those "important resource values" listed and described in the Affected Environment chapter.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Alternatives section of the Eastern Colorado RMP must include “resource condition objectives” and a range of “resource protections measures” designed to meet the objectives for the South Park MLP. In accordance with Chapter V, these RCOs and RMPs should be based on the “vision statement” for the MLP, address each of the “important resource values” in the planning area, and include conditions for development of both new and existing oil and gas leases. In addition, the Environmental Consequences chapter of the Eastern Colorado RMP should analyze the effectiveness of the RPMs in achieving the RCOs.

More specifically, we recommend that the South Park MLP include the following RCOs and RPMs among its management alternatives. These recommendations are consistent with the recommendations made by Park County in its scoping comments, which we herein reference and support.

The proposed Reinecker Ridge ACEC should be closed to oil and gas leasing as part of a balanced approach to oil and gas management in the South Park MLP. The proposed Reinecker Ridge ACEC is 12,883 acres of BLM land, which comprises just 4.5% of the federal mineral estate being addressed in the South Park MLP. Closing this small amount of the MLP to oil and gas leasing would not unduly preclude access to mineral development in South Park, and would

help the agency strike a better balance between resource use and conservation – protecting the most highly valued area in the South Park MLP and reducing conflicts as the Master Leasing Plan policy intended.

Resource: Drinking Water

RCO: Preserve the supply of drinking water provided by South Park and protect its condition and quality.

RPM:

-Include the following lease stipulations:

- 500 ft. NSO setbacks from the ordinary high-water mark of streams (both perennial and intermittent), lakes, reservoirs, springs, wetlands, and other riparian areas, w/out waiver, modification or exception
- 100 ft. NSO setbacks from ephemeral drainages, w/out waiver, modification or exception
- concentric closures around groundwater wells that produce drinking water

-Require that lessees:

- use closed loop systems;
- adopt most-protective well casing designs;
- reuse and recycle water as much as practicable;
- monitor surrounding water quality;
- submit remediation plans in case of accident;

-Prohibit lessees from:

- use of wastewater injection wells
- use of open pits and evaporation ponds
- installing pipelines through wetlands and fens

Resource: Fisheries

RCO: Protect Gold Medal trout fisheries and other key fishing waters, and prevent impairment of the recreational experiences these waters support.

RPM:

-Include the following general lease stipulations:

- 0.5-mile NSO setbacks on Gold Medal waters w/out waiver, modification or exception
- 0.25-mile NSO setbacks on other, non-Gold Medal, trout fishing waters w/out waiver, modification or exception

-Prohibit of lessees:

- dust suppression activities near riparian corridors

Resource: Wildlife

RCO: Protect key, big game habitat areas and provide robust protections for vulnerable and special status species.

RPM:

-Designate:

- the 12,883-acre Reinecker Ridge region as an ACEC
- a 4,392-acre subset of the Reinecker Ridge region as LWC

-Include the following lease stipulations:

- The Reinecker Ridge ACEC should be closed to leasing and NSO w/out waiver, exception or modification
- close 4,392 acres of elk winter concentration area, deer severe winter range and deer winter concentration area, which overlaps the territory of the proposed LWC within RR
- NSO w/in 3,806 acres of elk winter concentration area (bordering JMJ SWA on the east) and w/in 1,463 acres of elk winter concentration area (west of Hwy 9 between Fourmile Creek to the west and Middle Fork of South Platte to the east) w/out waiver or modification and w/ limited exception^
- NSO w/in 455 acres of bighorn sheep habitat at the northern edge of the MLP boundary and w/in 2,321 acres of elk winter concentration area that borders the proposed RR ACEC w/out waiver or modification and w/ limited exception^
- enhanced best management practices through adherence to CO Parks and Wildlife BMPs on:
- **two tracts totaling 5,090 acres in the southern most portion of the proposed MLP boundary, to protect elk winter concentration and production areas
- **52,156 acres of pronghorn winter concentration areas and deer severe winter range and winter concentration areas south of Spinney and Eleven mile reservoir and extending east and west of Hwy 9 and south of Hartsel
- NSO w/in 300 feet of active mountain plover nest sites w/out waiver or modification and w/ limited exception^
- NSO w/in 0.25 miles of identified raptor nest sites from February 1 through August 15 w/out waiver or modification and w/ limited exception^

- Require that lessees:

- adopt mufflers and other noise pollution controls

Resource: Wilderness Quality Lands

RPM: Recognize and protect the wilderness quality lands in the planning area.

RCO:

-Designate:

- a 4,392-acre subset of the Reinecker Ridge region as LWC

-Include the following lease stipulations:

- close LWC within Reinecker Ridge to leasing

Resource: Native Plants, Grasses, and Soils

RCO: Avoid damage to native plants, grasses and soils while still allowing oil and gas development in the MLP area.

RPM:

-Include the following lease stipulations:

- NSO on slopes steeper than 25%

-Include the following planning measures:

- surface disturbance caps
- phased leasing and development

-Require that lessees:

- submit master development plans
- reclaim sites and mitigate impacts
- install multiple wells/drilling pad
- use common corridors for linear disturbances
- use centralized collection facilities
- unitize common reservoirs
- use protective matting for native grasses

-Prohibit lessees from:

- installing pipelines through wetlands and fens

Resource: Cultural & Paleontological Resources

RCO: Preserve cultural and paleontological resources in their current state for the benefit of future generations.

RPM:

- Designate:

● the 13,000 acre Reinecker Ridge region as an ACEC

-Include the following lease stipulations:

● close the Reinecker Ridge ACEC to leasing

Where we have indicated that a "limited exceptions" may be allowed, we specifically recommend the following exception: "The Authorized Officer may grant an exception to an oil and gas lease no-surface occupancy stipulation only where the proposed action: (i) Would be the preferable course of action to meet the goals and objectives of the South Park MLP; or, (ii) is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear net conservation gain to priority wildlife habitat. Exceptions to this lease stipulation based on (i) will only be granted after consultation with Park County, affected landowners and Colorado Parks and Wildlife. Exceptions are to be granted only where allowing surface occupancy at a specific site within the lease parcel would better achieve the goals and objectives of the MLP than siting surface occupancy elsewhere. Exceptions based on (ii) will only be granted after consultation with Colorado Parks and Wildlife and must also include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts. Approved exceptions will be made publicly available at least quarterly."

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Sportsmen worked with Park County representatives and others to provide a map of appropriate stipulations for big game and other fish and wildlife habitats within the MLP boundary (see Appendix A). We urge the BLM to institute these MLP stipulations in the preferred alternative of the draft RMP. All stipulations and BMPs in the MLP area should have no waivers or modifications, with limited exceptions outlined in the Park County letter. Some areas identified "enhanced BMPs" are recommended. The term "enhanced BMPs" is intended to mean that BMPs are required rather than voluntary. In this case, we ask that the BLM use the CPW's guide on wildlife BMPs, "Colorado Division of Wildlife's actions to minimize adverse impacts to wildlife resources," 2008 (updated 2012).

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

In order to effectively avoid and mitigate impacts to resource values within an MLP area, it is first necessary to catalogue and discuss those resources and uses in the affected environment chapter and that may result in conflicts with oil and gas development (whether actual or reasonably foreseeable). Then, as detailed in Planning for Fluid Mineral Resources Handbook, Chapter V, resource condition objectives can be established and resource protection measures can be developed.

We feel that these elements are critical for a successful MLP for the South Park portion of the planning area and hope that our suggestions assist the BLM to: 1) ensure that an adequate level

of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

We advise caution on some of the water proposals presented in the report [south Park Master Leasing Plan], such as NSO, as they are redundant with existing laws and regulation. In general we are supportive of state regulation of water resources, as Colorado owns and regulates the water within its borders, but expansion of the Colorado Oil and Gas Conservation

Commission's rule 317B may be inappropriate, depending on how it is approached

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Western Energy Alliance opposes the removal of acreage from leasing or the imposition of NSO restrictions on BLM lands bordering the James Mark Jones State Wildlife Refuge through the proposed South Park Master Leasing Plan (MLP). BLM previously inventoried this area in 2013 and determined it was too small to qualify as Lands with Wilderness Characteristics, thus removing the justification for NSO restrictions or a complete prohibition on oil and natural gas leasing.(Reinecker Ridge Inventory, BLM, Front Range District/ Royal Gorge Field Office). The area's natural resources can be protected with standard leasing stipulations and existing state and federal regulations.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Watersheds throughout the RMP planning area, including the Upper South Platte watershed and potential leasing area, need to be protected to ensure the long-term health and viability of sources of public drinking water. Because both major and minor municipal water supplies and reservoirs exist within the RMP planning area, contamination of a drinking water supply reservoir or upstream water source could have serious and detrimental impacts to the health and wellbeing of our customers and residents. It is therefore important to Denver Water that the potential for contamination through accidental leaks and spills, as well as point/nonpoint sources of pollution associated with historic and future oil and gas development be addressed in the MLP and RMP.

B.1.25.2. Fluid Minerals - Oil and Gas - Alternatives

Total Number of Comments: 95

Summary

The BLM should reduce oil and gas conflicts with other resources by restricting or eliminating oil and gas development and identifying areas where oil and gas is incompatible with other resources/resource uses, regardless of surface ownership.

The BLM should consider a range of alternatives that includes an alternative that prohibits all oil and gas development, a no new leasing alternative, an alternative that allows oil and gas development throughout the area, a no hydraulic fracturing alternative, an alternative that prohibits any new hydraulic fracturing or other unconventional well stimulation practices, an alternative that considers development of renewable energy instead of oil and gas development, an alternative that applies the least restrictive constraint when considering oil and gas stipulations, and an alternative where, rather than leasing split-estate lands, other properties in south Park County where mining is already permitted under County ordinance would be leased.

The BLM should also consider NSO stipulations for projects within local, state, or national designated historic districts, including Tarryall Rural Historic Landscape District, Threemile Gulch Archeological District, Shawnee National Register Historic District, Staunton Ranch Rural Historic Landscape District, and Estabrook National Register Historic District; to protect the Mountain Plover; within elk winter concentration areas; within bighorn sheep critical winter range; within 100-year floodplains; where sources of public water exist; and to protect Gold Medal trout waters.

The BLM should consider setbacks from raptor nests; surface waters in the Upper South Platte Watershed; the ordinary high-water mark of water bodies; perennial and intermittent streams, lakes, reservoirs, springs, wetlands, and other riparian areas; recreation areas, including nonmotorized trails and designated camping areas; ephemeral drainages; the ordinary high-water mark from the Gold Medal trout streams and reservoirs; sources of public water; and cultural properties eligible for or listed on the local, state, or national historic registers. The BLM should also consider seasonal/timing restrictions to protect wildlife.

In addition to these restrictions, there should be less restrictions on oil and gas development. One commenter suggested the use horizontal and directional drilling techniques as a way to increase setback and consolidate support facilities.

Commenters suggested requirements for exceptions to NSO stipulations for wildlife, including consultation with Park County, affected landowners, and Colorado Parks and Wildlife. Another commenter suggested no waivers, exemptions, or modifications.

The following areas should be closed to oil and gas leasing and development:

- The entire planning area
- Critical wildlife habitats
- Bradford Canal (BLM)
- Areas specifically to protect elk and deer

- The dike walls of Huerfano County
- Areas around the Beaver Creek Loop
- Within the vicinity of mountain plover nests
- Within the vicinity of raptor nests
- Areas closed based on unacceptable impacts

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Sierra Club

Commenter1:Harv Teitelbaum

Comment Excerpt Text:

Where oil and gas operations conflict with other land management objectives, they should be restricted or excluded in order to facilitate compliance with the more fundamental objectives of the RMP.

Organization1:Sierra Club

Commenter1:Harv Teitelbaum

Comment Excerpt Text:

The Resource Management Plan should identify areas where oil and gas development is not desirable, either because of its impacts on the environment and other public resources, or because of its impacts on existing uses of the surface land -whether the surface land Is In federal, state, or private ownership.

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

Great care and biological expertise is required to determine what lands could allow gas and oil exploration and drilling and in what time of year the disturbance could occur to minimize loss of our wildlife.

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

ASGD urges the BLM to take the attitude that gas and oil can be slowly taken from the land, and that development of energy sources preserve the health ofland, water, humans and wildlife. Rehabilitation of damaged habitats in a timely way should be part of any allowed degradation.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Certain critical wildlife habitats should be denied any oil/gas leasing, or other detrimental activities.

Commenter1:Ed Talbot

Comment Excerpt Text:

My wife and I are residents of Grand Junction and the impacts of gas and oil drilling on BLM and other publci lands have multiplied. It is time to protect our public lands and place more of them in a protected status where development and drilling are not allowed.

Commenter1:Nicholas DiOrio

Comment Excerpt Text:

I hope the Bureau of Land Management considers an outright ban on oil and gas extraction in the study area. The realities of climate change coupled with negative side effects of oil and gas development make it clear that opening more wilderness to this kind of exploitation would not only be unwarranted, but shortsighted and irresponsible.

Organization1:Bjork Lindley Little PC

Commenter1:Stephanie Mondragon

Comment Excerpt Text:

BLM should avoid unnecessary and unreasonable restrictions on future oil and gas development in the Eastern Colorado planning area, and should continue to support multiple uses, including oil and gas leasing and development, in its final Environmental Impact Statement and Record of Decision.

Commenter1:Karl Ford

Comment Excerpt Text:

I ask BLM consider the following options regarding fracking on public lands from most preferred to least preferred:

- Suspend all fracking operations on public lands in the Royal Gorge Field Office. As shown above, there is ample reason and precedent at the state level for this.
- Institute a 5-year moratorium on fracking in the RGFO until the industry and the Colorado state regulators can be shown to adequately protect public health and the environment. This should be evaluated by qualified, non-biased Colorado academic researchers funded by industry but

  such funds managed by BLM.
- Institute a temporary moratorium on fracking in the RGFO until:

i. BLM has a sufficient number of qualified field inspectors/contractors are employed and trained, not primarily to verify production for royalties, but thoroughly trained to enforce the BLM fracking rule in totality.

ii.the Resource Advisory Council shall recommend to RGFO how many inspectors are needed to properly enforce all regulations and when the moratorium can be lifted.

iii. BLM requires baseline and operational air quality monitoring and water and soil analytical testing. Page 16181 of the fracking rule indicates BLM has authority ("best left to the discretion of local BLM offices") to require greater bonding and air and water quality testing as "conditions for approval"(page 16183).

iv. BLM requires the industry to pay for air, water, and soil monitoring, but not be allowed to actually conduct it.

Commenter1:Mary PhillipsBurke

Comment Excerpt Text:

No drilling; no extractions; no roads to support drilling of any kind! That is the ONLY way to protect these public lands and stop "big oil/big gas/big coal" from continuing to destroy ever more land in this country. Only renewable energy sources should be considered by ALL such corporations. Curtailing permits and banning ALL drilling on public lands is the only way to ensure they don't continue to rape & pillage this good earth!

Commenter1:Fran Field

Comment Excerpt Text:

From the eastern flanks of the Sangre de Cristo Wilderness to the headwaters of the mighty Arkansas River, these special places need to be safeguarded for their wilderness, recreation, and wildlife values, and protected from extractive or industrial uses such as mining and drilling for oil and gas

Commenter1:Roger Castle

Comment Excerpt Text:

The Bradford Canal (BLM) unit is a crucial elk habitat and migration corridor. While other wildlife (deer, antelope, etc) are also quite prevalent in this unit, elk use this particular unit extensively for both calving and seasonal grazing. (I can provide additional firsthand information if needed.) This small unit is also bounded entirely by private land and is not accessible via any public roads.

Any oil and gas development in this particular unit would be damaging and problematic to both wildlife and the adjacent landowners. It is also part of the scenic corridor of the east side of the Wet Mountains and is adjacent to the nationally designated wilderness area in the southern Wet Mountains. Thus, this unit should be classified as closed to any oil and gas drilling or mineral use.

Organization1:Western Values Project

Commenter1:Chris Saeger

Comment Excerpt Text:

· Prohibit drilling within the vicinity of mountain plover and raptor nest sites.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

We recommend that oil and gas leasing be excluded from these wetlands and that they be buffered by lands where, at the least, no surface occupancy is allowed.

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Close identified lands with wilderness characteristics from mineral leasing (Category 4). Incorporate this into the Master Leasing Plan, should one exist. [2]

Designate for no surface occupancy areas that are currently leased for minerals and call for BLM to define surface use restrictions. [3] Land managers can rely on regulatory tools to protect surface resources precipitated by the enactment of a host of environmental statutes of the Mineral Leasing Act. [4] Thus BLM has the authority to regulate surfacedisturbing activities "as required in the interest of conservation of surface resources. [5]

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

BLM may issue federal oil and gas leases that preclude all surface use activity on the lease. Consequently, a federal oil and gas lease does not ensure minimum surface use rights and any use may be diminished by the federal government. Leases are subject to regulations and formal orders instituted after the lease is issued. In the past, BLM discretion has limited surface activities where it jeopardizes sensitive species. This same legal authority extends to lands with wilderness characteristics.

Require that on renewal or transfer, any mineral lease incorporate the current stipulations found in this RMP in future leases.

Commenter1:R. Burghilde

Comment Excerpt Text:

-One course of action would be to hold off the oil and gas development until an objective investigation can certify that it is safe. (All the current work groups on the subject were anything than objective but heavily staffed and run by the oil industry and, here in Colorado, a governor who will do their bidding under any and all circumstances).

-If the BLM is obligated to allow fracking - and I doubt that this is the case, since it would give an unfair advantage to one industry over all others - the plans could be changed to at least not allow fracking in a location where almost half of Denver's drinking water is endangered.

-And, of course, the area slated for oil and gas development could be opened up to renewable energy development instead.

Commenter1:Tom Mowle

Comment Excerpt Text:

Fluid and solid mineral extraction should be set back from recreation areas, including motorized and non-motorized trails, and designated camping areas.

Commenter1:Steve Yamshita

Comment Excerpt Text:

As to the adequacy of available catalog of stipulations for future oil and gas leasing, an evaluation will be needed to assure that application of such stipulations provides sufficient protection for the various sensitive habitats and species involved, and whether additional stipulations will be needed.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW is concerned that the new statewide oil & gas leasing stipulations will be applied in a manner adequate to protect various sensitive habitats: wetlands, riparian corridors, seasonal big game migration corridors, big game winter range, raptor nests, listed species, candidate species, special concern species.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends that BLM identify required Best Management Practices to be applied to each mineral lease.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

There are a total of 60 Colorado State Wildlife Areas and 10 State Habitat Areas, administered by CPW, which occur within CPW's Northeast and Southeast Regions, and which are intersected by the Federal mineral estate for EC RMP. CPW requests "No Surface Occupancy" plus 0.25-mile buffer for these properties.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Aquatic Habitat Recovery and Conservation Waters

Aquatic habitat recovery and conservation waters are defined as reaches containing species under management for population conservation and recovery. These species may include fish such as the Arkansas darter, flathead chub, brassy minnow, common shiner, northern red-belly dace, southern red-belly dace, Iowa darter, plains orangethroat darter, sucker-mouth minnow, plains topminnow, plains minnow, stonecat, and lake chub, as well as amphibian species such as the northern leopard frog and plains leopard frog; all of which are state-listed as either species of special concern, threatened or endangered. CPW recommends a minimum buffer of 300ft extending from outside of the floodplain.

Cutthroat Trout Designated Critical Habitat: Are areas located within 300 feet (centerline for streams and shoreline for lakes) of any upstream waters within designated cutthroat trout habitat. CPW recommends no surface disturbance or construction activities within 300 feet of the floodplain of any designated cutthroat habitat.

Quality Fisheries: CPW recommends no surface disturbance within 300 feet of the floodplain of any quality fishery.

Northern Leopard Frog: CPW recommends: no surface occupancy within 0.25 miles of breeding sites.

Western Boreal Toad: CPW recommends: no surface occupancy within 0.5 miles of breeding sites.

River Otter: CPW recommends a controlled surface use stipulation of minimize disturbance to riparian vegetation and road development within 300 feet of occupied habitat.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Bald Eagle Active Nest Site & Winter Concentration Area: Bald eagle active nest sites are specific locations in which a pair of bald eagles has attempted to nest within the last five years. Bald eagle winter concentration areas are defined as areas (tree islands, etc) within an existing winter range where eagles concentrate between November 15 and March 15. These winter concentration areas may be associated with roost sites. CPW recommends "No Surface Occupancy" within 0.25 mile year round, and no human encroachment between November 15 and July 31 within 0. 5 mile of any active bald eagle nest, and no human encroachment between November 15 and March 15 within 0.5 mile of any winter concentration area.

Bald Eagle Communal Roost Site: Bald eagle roost sites are defined as groups of (or individual) trees that provide diurnal and/ or nocturnal perches for wintering bald eagles. These trees are usually the tallest available in the wintering area and are primarily associated with riparian areas. CPW recommends no surface occupancy within 0.25 miles of a roost site and a seasonal timing restriction of no human encroachment or surface disturbance within 0.5 miles of a roost site from November 15 - February 28.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Raptor Nests

Golden Eagle: a) pre-construction nest surveys, no surface occupancy within 0.25 miles of an active nest, and c) no human encroachment within 0.5 miles of an active nest site from December 15-July 15.

Prairie Falcon: a) pre-construction nest surveys, b) no surface occupancy within 0.5 miles of an active nest site, and c) no human encroachment within 0.5 miles of an active nest site from March 15-July 15.

Ferruginous Hawk: a) pre-construction nest surveys, b) no surface occupancy within 0.5 miles of an active nest site, and c) no human encroachment within 0.5 miles of an active nest site from February 1-July 15.

Peregrine Falcon: a) pre-construction nest surveys, b) no surface occupancy within 0.5 miles of an active nest site, and c) no human encroachment within 0.5 miles of an active nest site from March 15 - July 31.

Osprey: a) pre-construction nest surveys, b) no surface occupancy within 0.25 miles of an active nest site, and c) no human encroachment within 0.25 miles of an active nest site from April 1 - August 31.

Swainson's Hawk: a) pre-construction nest surveys, b) no surface occupancy within 0.25 miles of an active nest site, and c) no human encroachment within 0.25 miles of an active nest site from April 1 - July 15.

Northern Goshawk: a) pre-construction nest surveys, b) no surface occupancy within 0.5 miles of an active nest site, and c) no human encroachment within 0.5 miles of an active nest site from March 1 - September 15.

Other Raptors: a) pre-construction nest surveys, b) no human encroachment within active nesting habitat from January 1 - July 15, and c) no human encroachment within active roost sites from November 15 - April 1.

Burrowing Owl: CPW recommends: no human encroachment or surface disturbance within 300 feet of active nest sites from March 1 - August 1 5.

Mexican Spotted Owl- Critical Habitat & Protected Activity Area: CPW recommends: a) pre-construction nest surveys, b) no surface occupancy within an entire protected activity center, and c) no human encroachment from March 1 -August 31 for areas adjacent to a protected activity center.

Mountain Plover: CPW recommends a) pre-construction surveys for active nest sites, and b) no surface occupancy within 300 feet of an active nest.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Piping Plover Production and Foraging Area

Status: Federal threatened and State threatened

Are defined as areas that include nesting habitat and that contain one or more active or previously active and aggressively defended territories. Habitat includes shallow water areas along exposed beach substrates associated with lakes, ponds, and beaches, and dry, barren sandbars. These areas fluctuate with changing water levels on large irrigation reservoirs. CPW recommends two stipulations to protect these sites: a) No surface occupancy within 300 feet of the Ordinary High Water Mark, and b) a timing limitation of human activities within 0.5 mile from April 1 to July 31.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Swift Fox: CPW recommends: a) pre-construction surveys for active den sites, b) no human encroachment within 0.25 miles of active den sites from March 15 - June 15.

Kit Fox: CPW recommends: a) pre-construction surveys for active den sites, and b) a timing restriction of no human encroachment or surface disturbance within 0.25 miles of active den sites from February 1 - May 1.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Gunnison's Prairie Dog & White-tailed Prairie Dog Overall Range: The overall range is defined as an area that encompasses all known seasonal activity areas within the range of a population of prairie dogs. CPW recommends preconstruction surveys for active colonies and a timing stipulation to avoid direct disturbance to active colonies from March 1 through June 15. In addition, if development in prairie dog towns occurs during the spring or summer months (Feb 1 to Oct 31), the presence/absence of burrowing owls (a state threatened bird) and whether they are actively nesting should first be determined. If nesting burrowing owls are present, no human encroachment or surface disturbance should occur within 100m of nesting burrows from March 1 to August 15. If burrowing owls merely occupy the site, it is recommended that earthmoving and other disturbance activities be delayed until late fall after they have migrated.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Greater Prairie Chicken (Lek & Production Areas): Greater prairie chickens occupy undeveloped sand sage and sand hill prairie in eastern Colorado. CPW recommends these stipulations: a) no surface occupancy within 0.6 miles of a lek, b) a timing limitation on human activities within 2.2 miles of a lek between March 1-June 30, c) activities within this time period should be conducted between the hours of 9 a.m. and 4 p.m., and d) noise levels from postdrilling operation facilities limited to 49 db measured 30-feet from the source.

Gunnison's Sage-Grouse - Production Area (Breeding & Nesting): The Gunnison's sage grouse is a species for which CPW is engaged in a recovery program to avoid Federal listing under the Endangered Species Act (ESA). A federal listing decision for this species is anticipated during the Fall of 2015. Further, the BLM has not yet completed a draft of their Programmatic EIS for Gunnison's sage grouse. CPW is a cooperating agency on that document. The ECRMP Revision/EIS should incorporate by reference any design features, BMP's, lease notices, conditions of approval, and mineral development stipulations for Gunnison's sage-grouse that will be in the Programmatic EIS.

Lesser Prairie-Chicken - Lek Area, Focal Area, Corridor Area, Expansion Area: On May 12, 2014 the lesser prairie-chicken was listed as a threatened species under the endangered species act. Under this designation, mineral extraction leading to habitat destruction could be considered “take" of the species. Given the status of the species, CPW recommends NO LEASE of the nominated parcels within the greater prairie-chicken expansion area. If the BLM chooses to lease these parcels, the lessee must consult with the USFWS, or contact the Western Association of Fish and Wildlife Agencies (WAFWA) and enroll the parcels in the Lesser Prairie Chicken Range-Wide Plan to receive 40 protections for energy development activities.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Least Tern Foraging and Production Area

Status: Federal endangered and State endangered

Are defined as areas that include nesting habitat and that contain one or more active, or previously active and aggressively defended territory. CPW recommends two stipulations to protect these sites: a) No surface occupancy within 300 feet of the Ordinary High Water Mark, and b) a timing limitation on human activities within 0.5 mile from April 1 to July 31.

Preble Meadow Jumping Mouse Occupied Range: The Preble Meadow Jumping Mouse is both Federal threatened and State threatened. In order to protect PMJM habitat, CPW recommends a no surface occupancy stipulation within 300 feet of the stream centerline.

Plains Sharp-Tailed Grouse Breeding and Production Areas

Status: State Endangered Species.

The focal point of plains sharp-tailed grouse breeding is the lek or dancing ground. Many leks are used repeatedly year after year. Dancing grounds are typically located on benches, ridges, or slightly elevated valley areas. Plains sharp-tailed grouse leks and the surrounding production areas are important to breeding, nesting, and broodrearing cycles of this species. CPW recommends a stipulation with the following measures: a) a timing stipulation of no human encroachment within 1.25 miles of lek sites March 1-June 30, b) a surface density limitation of one pad per section, and c) limiting noise so as not to exceed 49 db measured 30ft. from source. (Plains sharptailed grouse lek buffers extend to 0.4 miles of lek sites. Plains sharp-tailed grouse production area buffers are from 0.4 miles to 1.25 miles of lei< sites). CPW also recommends a stipulation with the following measure "no surface occupancy within 0.4 miles of a lek site. If BLM stipulations are not

available to adequately address the concerns noted above for the plains sharp-tailed grouse leks and production areas, then CPW recommends that nominated parcels be deferred from leasing.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Moose Concentration Area, Priority Habitat, and Winter Range: Moose priority habitat areas contain riparian areas and have significant resource values to a host of wildlife. Generally, moose habitat is given protection through riparian and stream buffer stipulations (300 feet from live water and riparian habitats) and controlled surface use of activities.

Elk Winter Concentration Areas: Elk winter concentration areas are those parts of their winter range where elk densities are at least 200% greater than surrounding winter range density during the average five winters out of ten from the first heavy snowfall to spring green-up. CPW recommends a stipulation that restricts surface use from December 1 -April 15.

Elk Critical Winter Range

Includes elk winter concentration areas which are those parts of their winter range where elk densities are at least 200% greater than the surrounding winter range density during the average five winters out of ten from the first heavy snowfall to spring green-up. CPW recommends a timing limitation stipulation that restricts surface use from December 1-April 15, and a surface density limitation of one pad per sect ion or consider off site mitigation.

Elk Migration Corridor: Are defined as a specific mapped site through which large numbers of animals migrate, and the loss of which would change migration routes. CPW recommends a timing stipulation to allow for drilling and construction or other mineral development during the period between June 1 and November 30.

Elk Production Areas: Elk production areas are that part of the overall range of ell< occupied by females from May 15 through June 15 for calving. CPW recommends two stipulations: a) restrict construction, drilling, and completions surface use from May 15 through June 30, and b) a sur face density limit of one well pad per section or consider offsite mitigation.

Mule Deer Critical Winter Range: Mule deer critical winter ranges are considered of highest priority for protection from disturbance from development. Protection of these parts of mule deer critical winter range is considered critical to sustain mule deer populations across Colorado. CPW recommends two stipulations: a) restrict construction, drilling, and completions surface use December 1 to April 15, and b) a surface density limit of one well pad per section or consider off-site mitigation.

Mule Deer Migration Corridor: A specific mapped site through which large numbers of animals migrate and loss of which would change migration routes. CPWS recommends a timing stipulation to allow for drilling and construction or other mineral development during the period between June 30 and November 30. Also, limit surface density to one pad per section or consider off site mitigation actions.

Pronghorn Migration Corridor: A specific mapped site through which large numbers of animals migrate and loss of which would change migration routes. CPW recommends consultation on a

site by site basis to be completed at least 60 days prior to submittal of any application for mineral development or any surface disturbance within a pronghorn migration corridor.

Pronghorn Winter Concent ration Area: Pronghorn winter concentration areas are defined where densities are at least 200% greater than the surrounding winter range density. To protect pronghorn in these areas, CPW recommends a stipulation that restricts construction, drilling, and completions surface use from January 1 to March 31.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Rocky Mountain Bighorn Sheep Migration Corridor: A specific mapped site through which large numbers of animals migrate and loss of which would change migration routes. CPW recommends consultation on a site by site basis to be completed at least 60 days prior to submittal of any application for mineral development or any surface disturbance within a bighorn sheep migration corridor.

Rocky Mountain Bighorn Sheep Production Areas: Rocky Mountain bighorn sheep production areas are that part of the overall range of bighorn sheep occupied by pregnant females during a specific period of spring. If deferral of the nominated parcel is not granted, then CPW recommends a no surface occupancy stipulation for all mapped Rocky Mountain bighorn sheep production areas. Where oil and gas activities must occur in bighorn sheep production areas, avoid conducting these activities from April 15 through June 30.

Rocky Mountain Bighorn Sheep Winter Concentration Area: That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten. Where human or mineral development activities must occur in bighorn sheep winter range, CPW recommends avoiding these activities from November 1 through April 15.

Rocky Mountain Bighorn Sheep Winter Range: Rocky Mountain bighorn sheep winter range is that part of the overall range where 90% of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up. If deferral of the nominated parcels is not granted, then CPW recommends a no surface occupancy stipulation over the entire mapped Rocky Mountain bighorn sheep winter range. Where human or mineral development activities must occur in bighorn sheep winter range, CPW recommends avoiding these activities from November 1 through April 15.

Rocky Mountain Bighorn Sheep Severe Winter Range: That part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same time period used to define winter range in the average five winters out of ten. Where human or mineral development activities must occur in bighorn sheep winter range, CPW recommends avoiding these activities from November 1 through April 15.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW/SLB Recreation Lease Parcel (State Trust Land): Through a joint arrangement between CPW and the State Land Board, the Public Access Program allows public access to specific State Trust Lands for hunting, fishing, and other wildlife related activities. In order to avoid and/or minimize conflicts between these groups and the oil-gas developer, CPW requests that lessees consult with CPW at least 30-days prior to the initiation of development and recommends that construction and drilling activities be completed prior to the start of big game season - generally August 15th to avoid conflicts with hunters and vehicle traffic.

State Wildlife Areas: CPW either owns the surface in fee or has perpetual access easements on some lands for which the State Land Board owns and manages the minerals. For lands which CPW either owns or manages the surface in perpetuity as a State Wildlife Area (SWA), CPW issues regulations establishing both authorized and prohibited uses to ensure that each SWA is managed specifically for the use and enjoyment of the public for recreational hunting and fishing. Prohibited uses of SWA's under CPW regulations include commercial activity, including oil, gas, or other mineral exploration and development. This prohibition is due to the inherent incompatibility of commercial oil, gas, or other mineral development with recreational hunting and fishing enjoyment of SWA properties. In order to preserve hunting and fishing recreational opportunities at SWA's, CPW recommends No Surface Occupancy and a 0.25-mile buffer to protect wildlife conservation and hunting/fishing access on State Wildlife Areas.

State Habitat Areas: These are specific areas managed for wildlife habitat protection. They typically involve conservation easements on private surface lands and do not allow access for hunting or fishing. CPW recommends No Surface Occupancy and a 0.25-mile buffer surrounding these lands to protect wildlife conservation efforts on existing State Habitat Areas.

CPW Conservation Easements: CPW recommends No Surface Occupancy for energy or mineral development that must occur in areas intersected by CPW managed conservation easements.

Colorado Natural Areas: In general, given the unique and high value plant communities and/or wildlife habitat involved for sensitive species CPW recommends that a No Surface Occupancy stipulation be applied to future mineral leases that intersect Colorado Natural Areas. Where that is not possible, CPW recommends pre-construction surveys, buffer zones, and seasonal timing restrictions for the various sensitive species or habitats involved.

Colorado State Parks: CPW recommends No Surface Occupancy and a 0.25- mile buffer surrounding these lands to protect outdoor recreation uses on existing State Parks.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Appendix D - Best Management Practices for Oil & Gas Development in Colorado

COLORADO DIVISION OF WILDLIFE'S ACTIONS TO MINIMIZE ADVERSE IMPACTS TO WI LDLIFE RESOURCES October 2 7, 2008 (Updated March 16, 201 2)

The purpose of this document is to enumerate potential actions that may avoid, minimize, and/ or mitigate adverse impacts of oil and gas operations on Colorado's wildlife resources.

I. PLANNING INFRASTRUCTURE PLACEMENT AND DEVELOPMENT ACTIVITIES

Planning infrastructure placement and the timing of development activities to avoid and minimize impacts to wildlife resources is a critical component to any development strategy that balances the needs of wildlife with the rights of the oil and gas operator to produce oil and gas. To accomplish this objective, a Wildlife Impact Avoidance and Minimization Plan should be prepared prior to development that incorporates the following strategies:

A. Bring operators, CDOW personnel and surface owners together early in the planning process to assess wildlife needs and operational constraints, and to collaborate on a planning document that provides guidelines to avoid or minimize impacts to wildlife resources.

B. Plan development activities at the largest scale possible (i.e. landscape level) in order to allow for phased or clustered development to avoid or minimize impacts to wildlife resources. Use unitization, operator agreements, and other agreements to improve communication, to consolidate and minimize infrastructure, and to allow for effective landscape level planning.

C. Develop and implement an adaptive management program that provides for monitoring and evaluation, that documents environmental changes, and that implements mid-course corrections to development and operational practices.

Correlate oil and gas operations with environmental changes through ongoing monitoring and evaluation and adaptively adjust future oil and gas development activities as necessary to protect wildlife resources.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

II. ELEMENTS OF AN IMPACT AVOIDANCE AND MINIMIZATION PLAN

The following elements may be used collectively for the development of a landscape Wildlife Impact Avoidance and Minimization Plan, or individually as Avoidance Measures on a well-by-well basis.

A. GENERAL WILDLIFE AND ENVIRONMENTAL PROTECTION MEASURES: These measures are meant to educate field personnel regarding specific wildlife concerns.

1. Provide annual educational training for staff and contractors on specific wildlife issues of concern, (e.g., how to recognize lek sites, the location and importance of seasonal wildlife habitats and migratory patterns, how to locate mountain plover nests, the effects of winter range disturbance on wildlife, etc.,) and on the overall aspects of the landscape planning documents and any agreements with CDOW.

2. Establish policies to protect wildlife (e.g., no poaching, no firearms, no dogs on location, no feeding of wildlife, etc.).

3. Promptly report spills that affect wildlife to the Water Quality Control Division of CDPHE and CDOW.

4. Store and stage emergency spill response equipment at strategic locations along perennial water courses so that it is available to expedite effective spill response.

5. Avoid locating staging, refueling, and storage areas within 300 feet of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

6. Install automated emergency response systems (e.g., high tank alarms, emergency shut - down systems, etc.).

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

B. INFRASTRUCTURE LAYOUT WILDLIFE PROTECTION MEASURES (including production facilities, ancillary facilities, and roads): The purpose of these measures is to consolidate development activities and production facilities in order to minimize direct habitat loss and fragmentation, and to minimize displacement of wildlife due to audible, olfactory and visual disturbances.

1. Avoid new surface disturbance and placing new facilities in key wildlife habitats in consultation with CDOW.

2. Phase and concentrate all development activities, so that large areas of undisturbed habitat for wildlife remain. Maintain undeveloped areas within development boundaries sufficient to allow wildlife to persist within development boundaries during all phases of construction, drilling, and production. Minimize the duration of development and avoid repeated or chronic disturbance of developed areas. Complete all anticipated drilling within a phased, concentrated, development area during a single, uninterrupted time period.

3. Develop a transportation plan to incorporate the following strategies:

a. Minimize the number, length, and footprint of oil and gas development roads;

b. Use existing routes where possible;

c. Combine utility infrastructure (gas, electric, and water) planning with roadway planning to avoid separate utility corridors;

d. Combine and share roads to minimize habitat fragmentation

e. Place roads to avoid obstructions to migratory routes for wildlife, and to avoid displacement of wildlife from public to private lands.

f. Design roads with visual and auditory buffers or screens (e.g., topographic barriers, vegetation, and distance).

g. Surface roads to ensure that the anticipated volume of traffic and the weight and speed of vehicles using the road do not cause environmental damage, including generation of fugitive dust and contribution of sediment to downstream areas.

h. Locate roads as far from riparian areas and bottoms of drainages as possible and outside of riparian habitat.

i. Avoid constructing any road segment in the channel of an intermittent or perennial stream.

j. Avoid low water crossings. Structures for perennial or intermittent stream channel crossings should be engineered using bridges or appropriately sized culverts.

k. Design road crossings of streams to allow fish passage at all flows and to minimize the generation of sediment.

l. Design road crossings of streams at right angles to all riparian corridors and streams to minimize the area of disturbance.

m. Construct stream crossings "in the dry" to minimize sedimentation.

n. Protect culvert inlets from erosion and sedimentation and install energy dissipation structures at outfalls.

o. Implement fugitive dust control measures.

p. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.

q. Coordinate employee transport, encourage carpooling or provide bus transport to work sites.

r. Prohibit or substantially limit the amount of traffic on lease roads in important wildlife habitats within 3 hours of sunrise and sunset.

s. Install and use locked gates or other means to prevent unauthorized vehicular travel on roads and facility rights-of-way.

t. Limit parking to already disturbed areas.

u. Use man camps to reduce travel related disturbance when the benefits outweigh the disadvantages of developing human concentrations in wildlife habitats.

4. Develop and implement appropriate density caps or thresholds on wells sites, facilities and infrastructure (see the species-specific well site density recommendations in this document).

5. Maximize the utility of surface facilities by developing multiple wells from a single pad (directional drilling), and by co-locating multipurpose facilities (for example, well pads and compressors) to avoid unnecessary habitat fragmentation and disturbance of additional geographic areas.

6. Minimize the number, size and distribution of well pads and locate pads along existing roads where possible.

7. Cluster well pads in the least environmentally sensitive areas.

8. Consolidate and centralize fluid collection and distribution facilities.

9. Share/consolidate corridors for pipeline ROW's to the maximum extent possible.

10. Engineer pipelines to avoid field fitting and reduce excessive ROW widths and reclamation.

11. Adequately size infrastructure and facilities to accommodate both current and future gas production. Economize gas transportation.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

C. AQUATIC and WETLAND ENVIRONMENT PROTECTION MEASURES: The purpose of these measures is to avoid, minimize or mitigate disturbances to aquatic and wetland habitats and the unique wildlife communities associated with these habitats.

1. Minimize activities and operations within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

2. Schedule necessary construction in stream courses to avoid critical spawning times. General spawning avoidance guidelines are found under Species Specific chapters in this document.

3. Bore pipelines that cross perennial streams.

4. Use the minimum right-of-way width where pipelines cross riparian areas and streams.

5. Construct all crossings at right angles to the stream.

6. Do not remove native riparian canopy or stream bank vegetation where possible.

7. Avoid direct discharge of pipeline hydrostatic test water to any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

8. Avoid dust suppression activities within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

9. Screen water suction hoses to exclude fish.

10. Disinfect heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond, or wetland prior to moving the equipment to another water body. The disinfection practice should follow this outline:

a. Remove all mud and debris from equipment and spray/soak equipment with a 1:15 solution of disinfection solution containing the following ingredients:

i. Dialkyl dimethyl ammonium chloride, 5-10% by weight;

ii. Alkyl dimet hyl benzyl ammonium chloride, 5-10% by weight;

iii. Nonyl phenol ethoxylate, 5-10% by weight;

iv. Sodium sesquicarbonate, 1-5%;

v. Ethyl alcohol, 1-5%; and

vi. Tetrasodium ethylene diaminetetraacetate, 1-5%;

vii. and water, keeping the equipment moist for at least 10 minutes and managing rinsate as a solid waste in accordance with local, county, state, or federal regulations; or

b. Spray/soak equipment with water greater than 140 degrees Fahrenheit for at least 10 minutes.

c. Sanitize water suction hoses and water transportation tanks (using methods described above) and discard rinse water at an appropriately permitted disposal facility.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

D. DRILLING AND PRODUCTION OPERATIONS WILDLIFE PROTECTION MEASURES: The purpose of these measures is to reduce disturbance on the actual drill site and the surrounding area, to reduce direct conflict with wildlife and hunters, and to prevent wildlife access to equipment.

1. Schedule construction, drilling, and completion activities to avoid particularly sensitive seasonal wildlife habitats in consultation with CDOW.

2. Schedule construction, drilling, and completion activities to avoid seasons and locations when public use of lands is at its highest (e.g., big game hunting seasons).

3. Reduce visits to well-sites through remote monitoring (i.e. SCADA) and the use of multi -function contractors.

4. Use centralized hydraulic fracturing operations.

5. Transport water through centralized pipeline systems rather than by trucking.

6. Where possible, locate pipeline systems under existing roadways, or roadways that are planned for development.

7. Maximize use of state-of-the-art drilling technology (e.g., high efficiency rigs, coiled-tubing unit ri gs, closed-loop or pitless drilling, etc .) to minimize disturbance.

8. Conduct well completions with drilling operations to limit the number of rig moves and traffic.

9. Employ state-of-the-art technology to protect existing vegetation (e.g., use mats if possible to preserve topsoil/vegetative root stock).

10. Install exclusionary devices to prevent bird and other wildlife access to equipment stacks, vents and openings.

11. Ensure that surface discharged produced water meets minimum standards for Total Dissolved Solids (TDS) and Sodium Adsorption Ratio (SAR) to benefit wildlife.

12. Reduce noise by using effective sound dampening devices or techniques (e.g ., hospital-grade mufflers, equipment housing, insulation, installation of sound barriers, earthen berms, vegetative buffers, etc.). Appropriate noise limits are included in the species-specific recommendations in included in this document.

13. Locate above-ground facilities to minimize the visual effect (e.g., low profile equipment, appropriate paint color, vegetation screening in wooded areas, etc.).

14. During pipeline installations install trench plugs, earthen ramps, or other means as necessary to ensure that open pipeline trenches do not trap wildlife, and that pipe strings to not impair wildlife movements.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

E. FLUID PIT WILDLIFE PROTECTION MEASURES: The purpose of these measures is to prevent wildlife access to fluid pits and to reduce potential for contamination of water and soil by pit contents.

1. Avoid locating fluid pits within 300 feet of the ordinary high water mark of any reservoir, lake, wetland, or natural perennial or seasonally flowing stream or river.

2. Install and maintain adequate measures to exclude all types of wildlife (e.g., big game, birds, and small rodents) from all fluid pits (e.g., fencing, netting, and other appropriate exclusion measures).

3. Construct fluid pit fences and nets that are capable of withstanding animal pressure and environmental conditions and that are appropriately sized for the wildlife encountered.

4. Install impermeable barriers beneath fluid pits to protect groundwater, riparian areas and wetlands.

5. Skim and eliminate oil from produced water ponds and fluid pits at a rate sufficient to prevent oiling of birds or other wildlife that could gain access to the pit.

6. Construct fluid pits with a 4:1 escape ramp to allow entrapped wildlife to escape.

7. Treat waste water pits and/or any associated pit containing water with Bti (B. thuringiensis v. israelensis), commonly known as Mosquito Dunks, to control mosquito larvae that may spread West Nile Virus to wildlife or take other effective approaches to controlling mosquito larvae in ponds and pits.

a. The appropriate application rate of Bti is 1 dunk/100 sq. ft. of standing water, applied each 30 day period during 1 June - 30 September.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

F. INVASIVE/NON-NATIVE VEGETATION CONTROL: The purpose of these measures is to ensure proper planning, assessment and control of weed infestations on all locations.

1. Develop an aggressive, integrated, noxious and invasive weed management plan. Utilize an adaptive management strategy that permits effective responses to monitored findings and reflects local site and geologic conditions. Use of dedicated personnel with single responsibility for weed control is often the most effective approach.

2. Map the occurrence of existing weed infestations prior to development to effectively monitor and target areas that will likely become issues after development.

3. Establish a systematic and thorough noxious and invasive monitoring program for all disturbed areas and maintain monitoring records.

4. Continue control programs for the life of the well field.

5. Use reclamation as a weed management tool. Plant competition provided by established reclamation is the most effective weed management tool.

6. Thoroughly clean vehicles and other equipment to remove weed seeds before moving equipment to new sites.

7. Educate employees and contractors about noxious and invasive weed issues.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

G. RESTORATION, RECLAMATION AND ABANDONMENT: The purpose of these measures is to restore disturbed sites to their pre-development conditions, using native vegetation that can be used by the indigenous wildlife. Develop a reclamation plan in consultation with CDOW, NRCS, and the land owner or land management agency that incorporates wildlife species-specific goals and that defines reclamation performance standards, including the following components:

1. Soil

a. Store topsoil in windrows no higher than 5 feet .

b. Strip and segregate topsoil prior to construction. Appropriately configure topsoil piles and immediately seed to control erosion, prevent weed establishment and maintain soil microbial activity.

c. Maintain separation between pit contents and soils.

d. Salvage topsoil from all road construction and other rights-of-way and reapply during interim and final reclamation.

e. Evaluate the utility of soil amendment application or consider importing topsoil to achieve effective reclamation.

2. Seed

a. Use only certified weed-free native seed in seed mixes, unless use of nonnative plant materials is recommended by CDOW.

b. Test seed rigorously and frequently for purity, germination/viability, and the presence of weeds.

c. Use locally adapted seed whenever available, especially for species which have wide geographic ranges and much genetic variation (e.g. , big sagebrush (Artemesia tridentata), antelope bitterbrush (Purshia tridentata), etc.).

d. Where more than one ecotype of a given species is available and potentially adapted to the site, include more than one ecotype per species in the seed mix.

e. Use appropriately diverse reclamation seed mixes that mirror an appropriate reference area for the site being reclaimed (see also species-specific recommendations).

f. Conduct seeding in a manner that ensures that seedbed preparation and planting techniques are targeted toward the varied needs of grasses, forbs and shrubs (e.g., seed forbs and shrubs separately from grasses, broadcast big sagebrush but drill grasses, etc.).

g. Emphasize bunchgrass over sod-forming grasses in seed mixes in order to provide more effective wildlife cover and to facilitate forb and shrub establishment.

h. Seed immediately after re-contouring and spreading topsoil. Spread topsoil and conduct seeding during optimal periods for seed germination and establishment. Use of the same contractor for re-contouring land as used for seeding is often the most effective approach.

i. Do not include aggressive, non-native grasses (e.g., intermediate wheatgrass, pubescent wheatgrass, crested wheatgrass, smooth brome, etc.) in reclamation seed mixes. Site specific exceptions may be considered.

j . Distribute quick germinating site adapted native seed or sterile non-native seed for interim reclamation on cut and fill slopes and topsoil piles.

k. Plan for reclamation failure and be prepared to repeat seeding as necessary to meet vegetation cover, composition, and diversity standards.

I. Consider reclaiming with tubelings/plantings where seed failure is likely or has occurred.

3. Vegetative Cover Standard

a. Choose reference areas as goals for reclamation that have high wildlife value, with attributes such a diverse and productive understory of vegetation, productive and palatable shrubs, and a high prevalence of native species.

b. Establish vegetation with total perennial non-invasive plant cover of at least eighty (80) percent of pre-disturbance or reference area levels.

c. Establish vegetation with plant diversity of non-invasive species which is at least half that of pre-disturbance or reference area levels. Quantify diversity of vegetat ion using a metric that considers only species with at least 3 percent relative plant cover.

d. Establish permanent and monumented photo points and vegetation measurement plots or transects; monitor at least annually until plant cover, composition, and diversity standards have been met.

e. Observe and maintain a performance standard for reclamation success characterized by the establishment of a self-sustaining, vigorous, diverse, locally appropriate plant community on the site, with a density sufficient to control erosion and non-native plant invasion and diversity sufficient to allow for normal plant community development.

6. Riparian areas

a. Replace all riparian vegetation removed during development at a rate of at least 3: 1.

b. Restore both form' and function of impacted wetlands and riparian areas and mitigate erosion.

7. Disposal

a. Remove well pad and road surface materials that are incompatible with post -production land use and re-vegetation requirements.

b. Remove and properly dispose of degraded silt fencing and erosion control materials after their utility has expired.

c. Remove and properly dispose of pit contents where contamination of surface water, groundwater, or soil by pit contents cannot be effectively prevented.

8. Establishing reclaimed areas

a. Apply certified weed free mulch and crimp or tacify to remain in place to reclaim areas for seed preservation and moisture retention.

b. Utilize staked soil retention blankets for erosion control and reclamation of large surface areas with 3:1 or steeper slopes. Avoid use of plastic blanket materials, known to cause mortality of snakes.

c. Install cattle guards to regulate livestock pasture utilization;

d. Control weeds in areas surrounding reclamation areas in order to reduce weed competition.

e. Educate employees and contractors about weed issues.

9. Fencing

a. Support development and implementation of portable wildlife-proof fencing that could be used to protect vegetation during early stages of development then moved to another area. These should be implemented in areas where establishment of browse species is a priority. Monitor production of browse in areas receiving protection and compare to browse production in an adjacent area.

b. Fence livestock and/ or wildlife out of newly reclaimed areas until reclamation standards have been met and plants are capable of sustaining herbivory.

c. Inventory, monitor and remove obsolete, degraded, or hazardous fencing.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

H. MONITORING: These measures assess the ecological condition of a disturbed area and measure the success or failure of the reclamation effort as well as measuring effects of development activities on other resources.

1. Conduct necessary reclamation and invasive plant monitoring.

2. Census and assess the utilization of the reclaimed areas by the target species.

3. Maintain pre and post development site inspection records and monitor operations for compliance.

4. For those surface waters supporting fisheries, establish baseline water chemistry prior to development and establish a regular and repeated water chemistry monitoring and reporting program for groundwater, surface waters, and produced water discharged on the surface to detect and allow effective response to water quality issues that may impact aquatic wildlife. Quantify levels of pH, alkalinity, specific conductance, major cations/anions (including Cl, Fl, Sulphate, Sodium), total dissolved solids, BTEX/GRO/DRO, TPH, PAH (including benzo (a) pyrene), and metals (including As, Ba, Ca, Cd, Cr, Fe, Mg, Pb, Se), nitrate, nitrite, ammonia-N, turbidity, dissolved oxygen, hydrogen sulfide, and water temperature.

5. Monitor soil chemistry and structure where CBM or other produced water is put to a beneficial use (i.e., irrigation, water sources for wildlife, etc.).

6. Utilize GIS technologies to assess the extent of disturbance and document the reclamation progression and the footprint of disturbances.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

IV.SPECIFIC RECOMMENDATIONS FOR AQUATIC SPECIES/AMPHIBIANS

Consult with CDOW or collect baseline aquatic species and macro-invertebrate inventory data both pre and post development.

Conduct two pass population estimations for streams potentially affected. Report species composition, length-frequency and individual weights.

Collect water samples to monitor water quality before, during and after occupation and document data and changes.

Design stream crossings to minimize the tot al number of crossings and so that crossings are at or as near to 90 degrees to the direction of stream flow.

Construct stream crossings "in the dry" and avoid impacts to trout during spawning and hatching periods.

Restrict trucks from crossing streams and utilize appropriate and effective culverts that don't preclude upstream movement of fish.

Avoid using low water crossings.

Control erosion and sedimentation, and manage storm water runoff; reclaim sites as quickly as possible to restore vegetation.

Control weeds along riparian corridors and manage livestock grazing to maintain riparian corridor health.

Consider fencing riparian areas.

Avoid changes to water quality and quantity.

Repair incised channels where excessive erosion and sedimentation is occurring.

Consider directional boring of pipeline crossings of perennial streams.

Replace non-native riparian vegetation such as tamarisk and Russian olive with appropriate native plantings such as cottonwood or willow.

Protect groundwater, riparian areas and wetlands by installing impermeable barriers beneath fluid pits.

When working in quality fisheries disinfect heavy equipment, hand tools, boots and any other equipment that was previously used in a river, stream, lake, pond, or wetland prior to moving the equipment to another water body. The disinfection practice should follow this outline:

Remove all mud and debris from equipment and spray/soak equipment with a 1:15 solution of disinfection solution containing the following ingredients:

- Dialkyl dimethyl ammonium chloride, 5- 10% by weight;

- Alkyl dimethyl benzyl ammonium chloride, 5- 10% by weight;

- Nonyl phenol ethoxylate, 5- 10% by weight;

- Sodium sesquicarbonate, 1-5%;

- Ethyl alcohol, 1-5%; and

- Tetrasodium ethylene diaminetetraacetate, 1-5%

- and water, keeping the equipment moist for at least 10 minutes and managing rinsate as a solid waste in accordance with local, county, state, or federal regulations; or

Spray/ soak equipment with water greater than 140 degrees Fahrenheit for at least 10 minutes.

Sanitize water suction hoses and water transportation tanks (using methods described above) and discard rinse water at an appropriately permitted disposal facility.

Avoid stream channel disturbances during fish spawning seasons. Fish spawn at specific times of the year. The eggs incubate in the gravel until the yolk sac is absorbed and the larval fish can swim up through the gravel and into the main body of water. Eggs incubating in the redds can be smothered by the excessive deposition of sediment, and further affected by fungal spores carried in the sediment. Adults can be affected by the same fungal species with high mortality rates. Fish spawning dates and incubation times vary by elevation and temperatures, but in general the following intervals will apply in Colorado:

- Rainbow trout: March 1 - June 15
- Brown trout: October 1 - May 1
- Brook trout: August 15 - May 1
- Cutthroat trout: June 1 - September 1

- Bluehead sucker: May 1 - July 15
- Flannelmouth sucker: April 1 - July 1
- Roundtail chub: May 15 - July 15

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

III. RESEARCH:

These measures are suggested where questions or uncertainties exist about the degree of impact to specific resources or other aspects of oil and gas development or reclamation is unknown.

A. Collaborate and/or fund research investigation into the impacts of oil and gas development activities on wildlife resources.

B. Support research to test the effectiveness of specific Best Management Practices.

C. Identify native species for which commercial seed sources are not available. Provide support to contractors for developing cultivation and seed production techniques for needed species.

D. Conduct reclamation field trials to match seed mixes, soil preparation techniques, and planting methods to local conditions.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Focal Points - South Park Master Leasing Plan (SPMLP)

CPW would like to emphasize that the South Park area has many resources that are biologically significant and therefore deserves a high level of protection through well thought out, diligent stewardship. First, there are a number of CPW properties and management areas within the SPMLP Area, which are intersected by the Federal mineral estate, and which will require a high level of protection from future oil and gas development in order to preserve their intended purpose and use. These properties and management areas include State Wildlife Areas, State Habitat Areas, State Parks, State Trust Lands with hunting and fishing access, Colorado Natural Areas, and Conservation Easements. Second, there are a number of high value recreational sport fisheries that are hydrologically connected to one another and occur within the upper headwaters of the South Platte watershed. These include Antero Reservoir, Spinney Mountain Reservoir, Eleven Mile Reservoir, and a reach of the South Platte River known as the "dream stream". The economic benefit that these reservoirs and inter-connecting stream system provide to Park County and the surrounding area is significant. According to the 2008 report titled "The Economic Impact to Hunting, Fishing, and Wildlife Watching in Colorado" prepared by BBC Research and Consulting, fishing in Park County brings an estimated 14.2 million dollars annually to both the State's and County's economy. Third, there is an abundance of High Priority Habitat as well as occurrence of St ate and Federally-listed Endangered, Threatened, or Candidate wildlife or plant

species as mapped by the Colorado Natural Heritage Program (CNHP). This includes winter range for a number of big game species, quality fisheries, as well as biologically significant wetlands such as the High Cree l< Fen (administered by CPW via the Colorado Natural Area's Program). Fourth, the James Mark Jones State Wildlife Area (JMJSWA) within the middle of South Park is of extremely high value and importance and is intensively managed for big game habitat with particular importance for winter range for elk, mule deer, and pronghorn. The JMJSWA also provides important habitat for sensitive species such as Gunnison's prairie dog, mountain plover, and burrowing owl. Further, the JMJSWA is culturally significant to the history of South Park and includes numerous, documented archaeological sites. Fifth, the upper headwaters of the South Platte watershed and its associated reservoirs provide a critically important source of water for the municipal drinking water needs of the Denver Metro Area. Any unintended or adverse impacts to water quality at or adjacent to these reservoirs or their inter-connecting stream system could be detrimental not only to fish and wildlife, but also to drinking water supplies, and potentially could spread to other nearby water storage reservoirs as well. Sixth, South Park contains an elaborate network of wetlands and riparian corridors supported by a shallow, alluvial groundwater system. This network not only provides high value wildlife habitat to a host of species, but is also vulnerable to water quality issues due to the shallow groundwater table and complex interaction of surface and groundwater. Water quality safeguards including detailed Quality Assurance/Quality Control (QaQc) procedures as well as baseline and on-going monitoring are needed to assure that these areas remain healthy and vibrant throughout the development of available oil and gas resources.

Commenter1:Maridith Dressler

Comment Excerpt Text:

the BLM must stop leasing property to the oil and gas industry

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

All streams that are designated Gold Medal waters receive increased protection through stipulations on oil and gas leases of one-half mile NSO buffer along the entire Gold Medal corridor (and WIZ) or withdraw these areas from future leasing (see Map B. South Park Master Leasing Plan proposed boundary, Gold Medal waters, and important designation areas. See comment letter for map.)

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Stipulations that designate well spacing limitations and controlled surfaces use delineations should be reassessed and implemented in areas that contain important high value big game habitat. Limiting well spacing to reduce habitat fragmentation and impacting important migration routes should be based on habitat inventories and environmental conditions such as including water availability, drought conditions, range allotment allocations, etc.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Reinecker Ridge primitive lands (Map B) north and west of James Mark Jones State Wildlife Areas (SWA) should be protected. This backcountry area has numerous roads around its perimeter as well as some roads and trails that reach into the interior that provide sufficient access. Because of the irreplaceable wildlife value and the unique, undisturbed backcountry character these lands offer to sportsmen and society in general, they are not suitable for development and if leased at all, should have an NSO stipulation for the entire area or a no lease designation, and road building should not be permitted.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

State Wildlife Areas are acquired and designated by the State of Colorado due their importance to both fish and wildlife and to hunters and anglers. The best way to ensure their continued use by hunters and anglers and fish and wildlife is to manage them in a way that guarantees their longterm health and sustainability. If these lands overlie federal minerals, in order to guarantee their long-term health and adhere to their original intended use, these areas should have strict NSO stipulations.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

We request the BLM consider the following:

Baseline Data – The collection of baseline data must be a priority and written in to the operator's Management Plan. Prior to the beginning of any ground work, sufficient baseline data needs to be obtained in order to develop a strong and viable data source from which a monitoring program can be developed. Otherwise we are simply monitoring a moving target. Furthermore, this baseline data needs to be collected over a period of time that is long enough to establish a solid baseline, and in the case of sediment loading and siltation, surveyed at various times of year to take into account fluctuations in spring runoff, post runoff, and fall water levels. Baseline data should include inventories of streams and their conditions, should development occur within a watershed, baseline water sampling, habitat conditions and functionality, wildlife species present, and other pertinent values.

Monitoring - Once baseline data is collected, analyzed and stored in a GIS database for future use in monitoring, a plan can be developed that takes into account the ecological situation, surface-disturbing activities are approved and begun (as defined on those lands suitable for oil and gas) and a continuous monitoring program is implemented. Such a program must be reviewed annually, adjusted as needed, includes the participation of all affected stakeholders in a public format, and is evaluated for defects and success. Effective monitoring using the baseline data references is now the goal of responsible energy development. Surface and groundwater

monitoring should be a priority and we strongly urge the BLM to implement a baseline water monitoring plan. This is especially important in areas in the planning region that contain shallow aquifers. For instance, the shallow nature of aquifers in South Park require special attention given to ground water monitoring and potential contamination from drilling fluids, produced water and other by-products of the drilling/development process. Results of all the monitoring should be then downloaded and made publicly available for review.

Adaptive Management and Mitigation - As monitoring takes place, comparison of the baseline data against the monitoring results will lead to adaptive management should results reveal the need for a change in management direction. This approach can alleviate potential future negative impacts from development and lead to successful remediation to a problem. While monitoring may indicate the need to increase protections, it is also important to note that this approach to responsible development may very well result in the finding that protections in place to serve fisheries, wildlife and sportsmen's interests may be overly effective or result in a positive outcome that creates new management opportunities, including ones that may relax constraints.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Stronger oil and gas lease stipulations should be placed on any native cutthroat trout watersheds in order to protect these drainages and help establish connected future strongholds for these unique species.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

We are deeply concerned that continued extraction of fossil fuels worsens the climate crisis, endangers water, air, wildlife, public health, and local communities, and undermines the protection of our public lands. We propose that BLM consider a "no-leasing-no-fracking" alternative that would avoid these dangers altogether: BLM should end new fossil fuel leasing and ban new hydraulic fracturing and other unconventional well stimulation activities in the planning area.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

the only truly reasonable alternative to current management direction—that would both protect public health and preserve public lands for future generations—is to (1) suspend all new leasing of fossil fuels in the planning area, including oil, natural gas, coalbed methane, and coal and (2) disallow new hydraulic fracturing (or "fracking") or other unconventional well stimulation operations on existing leases, including acidization and gravel packing. Unconventional well stimulation refers to any activities that extract natural gas and oil from rock formations.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

BLM can end the dangerous practice of hydraulic fracturing within the planning area not only through an end to new leasing, but also through a ban of this practice on existing leases. A lessee's right to extract leased minerals is subject to BLM's duty and authority to protect environmental resources and any regulation that BLM deems necessary and proper.

The Mineral Leasing Act charges the Secretary of the Interior with the protection of environmental values in its oversight of federal mineral extraction. It directs the Secretary of the Interior to "regulate all surface-disturbing activities conducted pursuant to any lease issued under this chapter," and to "determine reclamation and other actions as required in the interest of conservation of surface resources." [30 U.S.C. § 226(g)] The MLA further dictates that, "[n]o

permit to drill on an oil and gas lease...may be granted without the analysis and approval" by the Secretary of Interior "of a plan of operations covering proposed surface-disturbing activities within the lease area." [30 U.S.C. § 226(g)] BLM has broad discretion in how it carries out these duties. The MLA authorizes the Secretary "to prescribe necessary and proper rules and regulations and to do any and all things necessary to carry out and accomplish the purposes of this chapter ..."201 Similarly, under FLPMA, BLM has discretion to "manage the public lands under principles of multiple use and sustained yield[,]"202 and "by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." [43 U.S.C. § 1732(b)]

Accordingly, BLM has issued regulations to protect the environment from mineral extraction. Key among them are BLM's regulations providing that leasehold rights are subject to "such reasonable measures as may be required by the authorized officer to minimize adverse impacts to other resource values,"204 and that operators "shall conduct operations in a manner which protects the mineral resources, other natural resources, and environmental quality." [43 C.F.R. § 3162.5-1] Thus, new operations on existing leases may be subject to reasonable measures to protect the environment post-lease.

Here, BLM has ample evidence of numerous environmental and public health harms of hydraulic fracturing and other unconventional well stimulation methods. In other respects, the safety of these practices is completely unknown. BLM should use its power to "do any and all things necessary" to protect local communities and the environment by banning new fracking and other unconventional well stimulation methods within the planning area. Such a ban may apply to all existing leases, and not just new leases that post-date a revised RMP. BLM regulations provide that all site-specific actions (presumably including drilling permit issuance) shall conform to the governing Resource Management Plan.206 Similar requirements exist for National Forest System lands.207 Since land use planning and plan consistency is specific and mandatory under FLPMA, BLM can require operators with existing leases to comply with the proposed fracking ban once it is adopted under a revised RMP

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Certainly, allowing new oil and gas leasing and fracking conflicts with reversing such trends, while halting these activities would at least avoid further population declines. In any case, BLM should not permit any new oil and gas leasing or any oil and gas development until biological inventories of special-status species and their habitats are complete

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The expansion of oil and gas development activities will harm wildlife through habitat destruction and fragmentation, stress and displacement caused by development-related activities (e.g., construction and operation activities, truck traffic, noise and light pollution), surface water depletion leading to low stream flows, water and air contamination, introduction of invasive species, and climate change. These harms can result in negative health effects and population declines. Studies and reports of observed impacts to wildlife from unconventional oil and gas extraction activities are summarized in Appendix A.172 Because the allowance of destructive oil and gas extraction runs contrary to BLM's policy of managing resources in a manner that will "protect the quality of…ecological…values" and "provide…habitat for wildlife,"173 a no-leasing/no-fracking alternative minimizing industrial development and its harmful effects on wildlife must be considered.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

A no-leasing-no-fracking alternative would curb all of the above sources of greenhouse gas emissions within the planning area, consistent with national policies to reduce climatewarming pollution.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The proximity of projected new oil and gas development to many communities, pristine recreational areas, and important drinking water sources within the planning area is all the more reason for BLM to end new leasing and fracking of oil and gas. Nearly every peer-reviewed study on fracking—96 percent—concludes that there are actual or potential human health risks attributable to this dangerous practice.30 After reviewing the more than 400 peer-reviewed scientific studies on fracking, four independent panels of public health scientists have reached the same conclusion—due to the known and unknown risks, fracking cannot be conducted safely.31 Following this science, and acknowledging the experiences of those affected by fracking and related activities, many state and local governments have adopted bans or approved moratoriums on fracking, including New York, Vermont, Maryland, Boulder County, Fort Collins, Los Angeles, and several California counties.32 Clearly, an end to new leasing and unconventional oil and gas extraction is a reasonable approach to protecting public health and the environment.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must justify any assumptions regarding the reclamation of disturbed areas by addressing the rate of operator compliance with reclamation standards, timeliness of compliance,

effectiveness of reclamation, and proposed or existing monitoring and enforcement mechanisms that assure successful reclamation. The EIS must also address any differences in BLM's imposition of reclamation standards on split estate and non-split estate lands. Presumably, "BLM has the authority to require the same mitigation on the private surface as it does on Federal lands."75 However, the EIS for the Northeast RMP Oil and Gas Leasing Amendments notes that "[r]eclamation requirements on private surface lands are negotiated with the landowner and the oil and gas operator. For this reason, there is no certainty that the land would be returned to its former condition." 76 The EIS must clarify whether BLM requires reclamation on split-estate lands, and indeed, should require full reclamation in every instance.

Organization1:City of Aurora

Commenter1:Marshall Brown

Comment Excerpt Text:

In addition, Aurora Water is supportive in the use of horizontal and directional drilling techniques to increase setbacks and consolidate support facilities.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The following are stipulation decisions that were provided for in the 1996 RGFO RMP but never

written up as specific stipulations.

Num. / Type / Protection / Authority

NSO to protect lake DeWeese R&PP RGFO RMP

NSO to protect St. Scholastica R&PP RGFO RMP

NSO to protect Deer Mtn. Fire Station R&PP RGFO RMP

NSO to protect Odd Fellows Lodge R&PP RGFO RMP

NSO to protect developed recreation sites RGFO RMP

NSO to protect reservoir rights-of-way RGFO RMP

NSO to protect Garden Park ACEC RGFO RMP

NSO to protect Mosquito Pass ACEC RGFO RMP

NSO to protect High Mesa Grasslands ACEC RGFO RMP

NSO to protect Droney Gulch ACEC RGFO RMP

NSO to protect lesser prairie chicken habitat (see CO- 02) RGFO RMP

CSU To protect VRM class II areas

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

No Surface Occupancy (NSO) for projects within local, state, or nationally designated historic districts, including but not limited to Tarryall Rural Historic Landscape District, Threemile Gulch Archeological District, Shawnee National Register Historic District, Staunton Ranch Rural Historic Landscape District, and Estabrook National Register Historic District.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Individual cultural properties eligible for or listed on the local, state, or national historic

registers should be surrounded by an avoidance area sufficient to avoid adverse impacts,

both physical and visual.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

No Surface Occupancy (NSO) stipulations for water bodies. These stipulations include a recommendation for a ½-mile NSO setback for Gold Medal Waters and a 500-foot NSO setback for all other water bodies. Park County Regulations define a water body as perennial or intermittent river, stream, lake, reservoir, pond, spring or wetland, but does not include irrigation ditches or roadway drainage ditches or artificial lakes or ponds or wetlands that are created and used for the primary purpose of agricultural operations.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Mountain Plover - No Surface Occupancy within 300 feet of active mountain plover nest sites until young are hatched and independent of nest.

No Surface Occupancy for development activities from April 10 through July 10. To comply, suitable nesting habitat must be surveyed within the known range of mountain plover that is proposed for development during the appropriate season, and active nests must be flagged. The purpose of this recommendation is to avoid disruption of nesting mountain plover. Mountain plover is a Colorado Parks and Wildlife designated “species of concern.”

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Raptor Nests

This area encompasses the nests of raptors that are other than threatened, endangered or candidate species. No development activities would be allowed within 0.25 mile of identified raptor nest sites from February 1 through August 15, or until fledgling and dispersal of young. (Development would be allowed from August 16 through January 31). The purpose is to prevent disruptions of nesting raptors that may result in absences of adults sufficient to cause direct or indirect mortality of the eggs or young or the premature departure of young from the nest.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Proposal Exceptions language for no surface occupancy stipulations

To ensure proper management, the Authorized Officer may grant an exception to a No Surface Occupancy stipulation only where the proposed action:

(i) Would be the preferable course of action to meet the goals and objectives of the RMP; or,

(ii) Is proposed to be undertaken as an alternative to a similar action occurring on a nearby parcel, and would provide a clear net conservation gain to priority wildlife habitat.

Exceptions to this lease stipulation based on (i) above should be granted only after consultation with Park County, affected landowners and Colorado Parks and Wildlife. Exceptions should be granted only where allowing surface occupancy at a specific site within the lease parcel would better achieve the goals and objectives of the RMP than siting surface occupancy elsewhere. Exceptions based on (ii) should be granted only after consultation with Colorado Parks and Wildlife and also should include measures, such as enforceable institutional controls and buffers, sufficient to allow the BLM to conclude that such benefits will endure for the duration of the proposed action's impacts. Approved Exceptions should be made publicly available at least quarterly.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

the County's scoping comments, which CWF and NWF support, requests the following no surface occupancy setbacks on BLM lands in South Park from surface waters in the Upper South Platte Watershed:

--500 feet setback from the ordinary high-water mark of water bodies: perennial and intermittent streams, lakes, reservoirs, springs, wetlands, other riparian areas.

--No surface occupancy within 100-year floodplains, or 500 feet from the stream, whichever is greater,

--100 feet from ephemeral drainages, and

--One-half mile (2,640 horizontal feet) setback on either side of the ordinary high water mark from the gold medal streams and reservoirs. This buffer is needed to maintain the extraordinary recreational experience that anglers in Colorado, the United States and internationally value in South Park's gold medal waters.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

CWF, joined by NWF, Trout Unlimited and Theodore Roosevelt Conservation Partnership, studied wildlife habitat and populations during the stakeholder process, culminating in development of a map (attached) that depicts the areas we recommend for no leasing, no surface occupancy, and enhanced (required) best management practices (BMPs), respectively. These acreages are areas of critical environmental concern (ACECs).

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Elk - No Leasing area; Deer – No Leasing area

This area encompasses 4,392-acres located approximately four miles east of Fairplay and contiguous to the western portion of the James Mark Jones State Wildlife Area. This area is an elk winter concentration area. A portion of this area is also deer severe winter range and a winter concentration area. In addition, this area serves as a migration corridor for elk and deer to move

between winter and summer range. It is important to avoid activities within mule deer severe winter range, elk winter concentration areas, production areas and migration corridors.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Elk – No Surface Occupancy areas

The proposed 3,806 acres include those BLM lands that border the James Mark Jones State Wildlife Area to the east and west. These BLM lands are south of the No Lease area proposed above. An additional 1,463 acres proposed for no surface occupancy are located west of Highway 9, situated between Fourmile Creek to the west and the Middle Fork of the South Platte to the east. This totals 5,269 acres. These areas are elk winter concentration areas. It is important to avoid activities within elk winter concentration areas.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Bighorn Sheep – No Surface Occupancy area

These 455 acres include BLM surface and subsurface acres located approximately 3 miles northwest of Fairplay along Highway 285 and a small section that borders the northern edge of the proposed MLP boundary. This area serves as a critical winter range for a bighorn sheep herd and it is important to avoid surface disturbance within bighorn sheep production and wintering areas.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Watersheds throughout the RMP planning area, including the Upper South Platte watershed and potential leasing area, need to be protected to ensure the long-term health and viability of sources of public drinking water. Because both major and minor municipal water supplies and reservoirs exist within the RMP planning area, contamination of a drinking water supply reservoir or upstream water source could have serious and detrimental impacts to the health and wellbeing of our customers and residents. It is therefore important to Denver Water that the potential for contamination through accidental leaks and spills, as well as point/nonpoint sources of pollution associated with historic and future oil and gas development be addressed in the MLP and RMP.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Denver Water advocates Park County's regulatory requirement of a 500-foot surface setback (or no surface occupancy [NSO]) from water bodies for any proposed oil and gas surface disturbance in the Upper South Platte watershed, and suggests that BLM consider applying this across the RMP planning area where sources of public water exist. This should extend from the ordinary high water mark of perennial/intermittent streams, lakes, reservoirs, springs, wetlands, and other riparian areas. For all NSO stipulations, Denver Water prefers that there are no waivers, exceptions or modifications. These recommendations are consistent with other setbacks for surface waters on federals lands.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Denver Water is in support of responsible energy development in South Park, and throughout the RMP planning area, but headwater streams and reservoirs, and public health, need to be safeguarded.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Furthermore, Denver Water supports a 0.5-mile (2,640 horizontal feet) surface setback/NSO from designated gold medal waters on BLM-managed lands of any oil and gas development sites across the RMP planning area. This setback should be on either side of the ordinary high water mark (bank-full stage). This suggested NSO area is consistent with BLM visual resource management guidelines to protect exceptionalfisheries, scenic values, visual impacts and riparian management based on impact analysis.

Commenter1:Evi Klett

Comment Excerpt Text:

Public lands should certainly be areas protected from the 20% maximum

ceiling of oil and gas extraction. It will be difficult enough to

curtail oil and gas extraction on private land as it is.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

8. Analysis of Proper Range of Alternatives

In order to provide a proper range of alternatives for environmental analysis, a "NO NEW LEASING" alternative must be seriously considered. Under this alternative, no new oil or gas leases would be let on BLM lands after the effective date of the Plan amendment. In other words, all BLM lands in Eastern Colorado would be unavailable for such leasing. As noted above, oil and gas operations have significant negative consequences. No new leasing would greatly reduce, over time, the impacts that would otherwise occur from activities associated with oil and gas development. It would also address public concerns over oil and gas leasing on public lands and the significantly greater impacts of new technology. It is therefore a reasonable alternative to analyze.

Under applicable federal laws and policies, there is no preference for oil and gas development over other uses (See BLM Instructions Memorandum No. 2010177, p. 2). The BLM is under no obligation to open any particular portion of lands to immediate exploitation. Benefits and impacts to future generations must be considered. Possible technological improvements which might reduce environmental impacts are likely to be developed and make it appropriate for the BLM to declare areas off limits to present exploitation technologies that cause unacceptable impacts.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Eastern Colorado RMP must identify BMPs and make them mandatory, especially in sensitive areas. BMPs should include:

- Phased or strategic development - in terms of timing (developing one area, then restoring before moving to another), location (such as staying out of big game corridors), limiting amount of equipment in use at any given time, limiting amount of surface disturbance on a lease at any given time and requiring successful restoration before permitting additional disturbance;
- directional drilling;
- clustered drilling;
- closed loop drilling;
- interim reclamation;
- restoration standards;
- unitization; and
- increased bonding.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Grape Creek ACEC. Grape Creek possesses values and resources uncommon to BLM lands. It is highly significant due to its historical context, recreational values, scenic backdrop, and rich biodiversity. The current ACEC should be expanded to protect similar values on adjacent BLM lands.

The area within the Grape Creek ACEC includes historic and cultural resources and important plant and wildlife resources. Multiple historic structures and an old railroad route are located within the current ACEC. The structures and railroad grade have historical significance and add supplemental value to the unit. The site also holds strong evidence of inhabitation by indigenous peoples. Grape Creek provided a historical route to the Wet Mountain Valley for indigenous peoples and more recently as a stagecoach route and then a railroad route, which was constructed in the late 1800s and eventually abandoned and dismantled in the early 1900s after repeated floods washed out the tracks.

This area has very high biodiversity values due to excellent occurrence of a globally imperiled riparian natural community, narrowleaf cottonwood - Rocky Mountain juniper (Populus angustifolia - Juniperus scopulorum) woodland. Additionally, there is a good occurrence of the globally vulnerable narrowleaf cottonwood - Douglas-fir (Populus angustifolia - Pseudotsuga menziesii) woodland and a good to fair occurrence of the apparently globally secure but state imperiled Rocky Mountain juniper / Red-osier dogwood (Juniperus scopulorum / Cornus sericea) woodland. Several fair occurrences of a globally imperiled plant, Arkansas Canyon stickleaf (Nuttallia densa), have also been documented. The expansion of this ACEC to Copper Gulch supports an excellent occurrence of the globally imperiled (G2/S2) Degener beardtongue (Penstemon degeneri). This area is critical for Rocky Mountain bighorn sheep, as a production area, overall range, and summer and winter concentration areas. This area also supports populations of black bear, elk, mule deer, white-tailed deer, pronghorn, mountain lion, Aberts squirrel, a Colorado critically imperiled species - Brazilian free tailed bat, and the BLM Sensitive Gunnison prairie-dog. Valued bird species also take refuge in this area and include the CPW endangered species Mexican spotted owl, as well as the bald eagle and scaled quail, all of which are listed as Species of Most Concern. The expansion also supports wild turkey roost sites and winter concentration area.

Protective management of the area is important to protect values and resources in the Grape Creek corridor and nearby BLM lands, some of which are endemic only to this region. This would be best achieved through expanding the existing Grape Creek ACEC.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Further, BLM should consider alternatives which choose not to re-lease areas formerly leased when those leases expire or are terminated. Areas where there are specific resource concerns or that are identified as important habitat should be considered for other uses besides oil and gas leasing. These areas may include, but are not limited to: Areas of Critical Environmental Concern, Special Recreation Management Areas, Potential Conservation Areas, critical habitat, areas with cultural resources, proposed wilderness and lands with wilderness characteristics.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Further, BLM often offers companies exceptions, modifications or waivers from the application of NSO stipulations. Having NSO stipulations on a majority of the lands within the field office is better than allowing surface occupancy in terms of wildlife and resource concerns, but that does not supplant the BLM's obligation to manage for a variety of resources, of which oil and gas is only one.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In order for the BLM to comply with FLPMA and NEPA the agency should, at a minimum, consider and "rigorously explore" the possibility and design alternatives which do not leave a significant portion of the Field Office open to oil and gas leasing. See 43 U.S.C. § 1712(c)(1) and 40 C.F.R. §§ 1502.14(a) and 1508.25(c). We recommend, at a minimum, that the areas identified as having "low" oil and gas potential be removed from consideration for leasing. Further, BLM must consider a range of alternatives that will address what to do with currently leased lands which are not developed and are either terminated or expire. Not allowing oil and gas leasing in these areas would help the BLM move towards meeting its goal of managing the federal lands within its jurisdiction for a variety of uses, not primarily for oil and gas leasing. For lands which area identified as appropriate for leasing, a variety of non-waivable stipulations, conditions of approvals (COAs), and Best Management Practices (BMPs – discussed later) should be developed to protect the many resources present in the planning area.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Coal bed natural gas development:

According to the 2012 RGFO Reasonable Foreseeable Development forecast for the area over the next 20 years, there is high potential for coalbed natural gas development west of Trinidad in the southwest portion of the field office. BLM managed surface acres in the area are used by mule deer as a winter concentration area. This CPW identified habitat should be off-limits to any surface disturbing activities/developments resulting from any future development of CBNG resources. This could be achieved with nonwaivable no surface occupancy lease stipulations.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

major development activities, such as oil and gas development, require a great deal of roads and other infrastructure such as power lines and pipelines that need to be accessed on a regular basis, even after initial development is completed. There are ways to minimize these impacts on fish and wildlife habitat such as directional drilling and clustered development, and some areas are simply too important for fish, wildlife, hunting and angling that they should be excluded from development activities that fragment habitat.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

BLM's Manual on Land Use Planning specifically states that "[w]hen applying leasing restrictions, the least restrictive constraint to meet the resource protection objective should be used." BLM Handbook H-1601-1, App. C. II. H. at 24. We urge BLM to observe this statutory mandate and regulatory guidance as it considers any stipulations for oil and natural gas leases, especially with regard to timing limitations, No Surface Occupancy (NSO) stipulations, and seasonal restrictions. As NSO is the most restrictive stipulation, it should be used only sparingly.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

The RMP/EIS should reflect federal law and policy and the nation's need for secure sources of domestic energy. The RMP/EIS must also acknowledge that oil and natural gas resources are developed in an environmentally responsible manner while providing the nation with an abundant source of affordable energy. Finally, BLM has a congressionally mandated multiple-use mission, which must be honored and not compromised by the single-use land management objectives promoted by certain single interest groups.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Colorado's 1200 Series regulations provide reasonable and appropriate protections for wildlife resources. BLM should defer to the state's rules and not impose any duplicative or burdensome mechanism for wildlife protection.

Commenter1:Suzanne Watson

Comment Excerpt Text:

that the dike walls of Huerfano County be allocated as offlimits to gas and oil drilling.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

"The characterization of the in-situ stress state and the natural fractures around dikes can be accomplished using 3D azimuthal reflection seismic (reflected P-waves). The characterization

of the in-situ stress state includes: local direction of maximum horizontal stress; and max-min horizontal stress (the differences in the two horizontal stresses). The characerization of the natural fractures includes: azimuth of the dominant set of vertical aligned fractures; estimate of the magnitude of teh fracture density for one set of vertical aligned fractures. I recommend that the BLM require the documentation of the structure and lithology of adjacent rocks, in-situ stress, and natural fractures around the dike intrusions that lie on BLM land, prior to allowing any drilling within 1000 meters (3280 ft.) of dikes that extend to the surface, or dikes that are buried at depths."

Commenter1:William Carter

Comment Excerpt Text:

I understand that many social and market forces make these kinds of fossil fuel extractions appear attractive and viable, but in the case the the area around the Beaver Creek Loop, I hope subsurface oil and gas leases will not be allowed. I believe the area meets the BLM requirements of the a Land With Wilderness Characteristics with respect to solitude, primitiveness, remoteness and unconfined recreation. It is a precious area and should be preserved and protected, free from as much human influence as possible.

Commenter1:rebecca heisler

Comment Excerpt Text:

A science based approach to designating various areas as open to leasing for oil, gas, mineral or what-have-you must be applied. As it is now areas that are marginal at best have been designated as lease-able by BLM. The very fact that lands are leasable is one reason given by Shell Oil Company in a 1970 report that summarizes the history of oil and gas exploration to that date. Thus, designating marginal lands as leasable encourages anyone who expects government subsidies and/or unsuspecting venture capitalists to provide funding for dubious exploration to muck up pristine areas for a lost cause. Although data is not easy to acquire, I do not know of ANY commercially feasible oil or gas operation in Park County. This should be testament sufficient to remove BLM lands from oil and gas leasing in Park County. In addition to the above reason, the characterisics of south park outlined in the envisioning meeting in Fairplay, CO on May 20, 2015, such as unobstructed and unspoiled views and large open spaces,the potential for solitude, dark skies, pristine water quality - both surface and groundwater - and numerous other qualities would be compromised by oil and gas exploration. The same can be said for any exploration and large scale mineral extraction, especially for uranium. In addition, prehistoric cultural sites in Park County have been identified recently. New geologic hazards - sinkholes - have also been identified recently by the USGS. As a designated National Heritage Area, South Park has recently obtaned this special status. There may be many unknown qualities/characteristics about Park County yet to be discovered that would be adversely impacted by exploration/extraction of oil, gas, and/or minerals. Most especially, the impacts to groundwater and the groundwater regime itself is poorly understood and is currently being researched Therefore, I encourage the BLM to remove all of their lands from oil, gas, and mineral exploration in South Park.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Denver Water advocates Park County's regulatory requirement of a 500-foot surface setback (or no surface occupancy [NSO]) from water bodies for any proposed oil and gas surface disturbance in the Upper South Platte watershed, and suggests that BLM consider applying this across the RMP planning area where sources of public water exist. This should extend from the ordinary high water mark of perennial/intermittent streams, lakes, reservoirs, springs, wetlands, and other riparian areas. For all NSO stipulations, Denver Water prefers that there are no waivers, exceptions or modifications. These recommendations are consistent with other setbacks for surface waters on federals lands.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Denver Water supports a 0.5-mile (2,640 horizontal feet) surface setback/NSO from designated gold medal waters on BLM-managed lands of any oil and gas development sites across the RM P planning area. This setback should be on either side of the ordinary high water mark (bank-full stage). This suggested NSO area is consistent with BLM visual resource management guidelines to protect exceptional fisheries, scenic values, visual impacts and riparian management based on impact analysis.

B.1.25.3. Fluid Minerals - Oil and Gas - Baseline Affected Environment

Total Number of Comments: 9

Summary

Commenters noted that drilling technology has changed in recent years, including the use of horizontal drilling and allowing multiple wells on a single pad. The BLM should recognize the energy companies' efforts to improve habitat and positively impact wildlife species.

The BLM should analyze the following studies pertaining to health impacts of oil and gas development:

- Colorado School of Public Health report, published in Science of the Total Environment
- Colorado School of Public Health report, published in Environmental Health Perspectives
- "Estrogen and Androgen Receptor Activities of Hydraulic Fracturing Chemicals and Surface and Ground Water in a Drilling-Dense Region," published in Endocrinology
- 2014 Environmental Health Perspectives epidemiological study
- A 2014 Environmental Health Perspectives paper by a National Institutes of Environmental Health Science workgroup

In its description of the affected environment, the BLM should include:

- Whether existing oil and gas wells and wastewater injection wells in the area induced seismic activity;
- A characterization and identification of the region's fault environment;

- The background seismicity of oil- and gas-bearing lands;
- The geology of oil- and gas-bearing lands;
- The current state of knowledge on the risk and hazards of induced seismicity from oil and gas development activities; and
- The amount, type, and potency of radioactive elements that are naturally occurring in landforms.

Information states that the impacts of oil and gas development are temporary. The hydraulic fracturing (fracking) industry has an acceptable well failure rate of 4 to 8 percent. Chemicals used in hydraulic fracturing are listed as hazardous under federal laws.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Anadarko Petroleum Corp.

Commenter1:Nick Owens

Comment Excerpt Text:

Horizontal Pad Development

There has been a significant shift in drilling technology that uses horizontal drilling allowing placement of multiple wells on a single well pad over the last five years.

Commenter1:Eddie Kockman

Comment Excerpt Text:

A summary of the current knowledge concerning geological formations throughout Park County, with emphasis on the potential for finding profitable levels of oil and gas should be summarized in a MLP. The extent of potential oil/gas production from the Niobrara formation would be of most importance. Based on this data a determination could be made regarding volumes of oil and gas available and duration of any future production period.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Natural gas drilling operations result in the emissions of numerous non-methane hydrocarbons (NMHCs) that have been linked to numerous adverse health effects. A recent study that analyzed air samples taken during drilling operations near natural gas wells and residential areas in Garfield County, detected 57 chemicals between July 2010 and October 2011, including 44 with reported health effects.112 For example:

Thirty-five chemicals were found to affect the brain/nervous system, 33 the liver/metabolism, and 30 the endocrine system, which includes reproductive and developmental effects. The categories with the next highest numbers of effects were the immune system (28), cardiovascular/blood (27), and the sensory and respiratory systems (25 each). Eight chemicals had health effects in all 12 categories. There were also several chemicals for which no health effect data could be found.113

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Available Oil and Gas Lease Stipulations in RGFO as of 10/11/12

Type Designations: NSO=no surface occupancy, TL=timing limitation, CSU=controlled surface use, LN=lease notice Authority Designations: ESA=Endangered Species Act, MBTA=Migratory Bird Treaty Act, BGEPA=Bald and Golden Eagle Protection Act, NHPA=National Historic Preservation Act, PRPA=Paleo Resource Preservation Act

Num. / Type / Protection / Authority

RG-02 TL to protect deer and elk winter range (South Park) RGFO RMP

RG-03 TL to protect lesser prairie chicken habitat RGFO RMP

RG-06 TL to protect Least Tern and Piping Plover Habitat RGFO RMP

RG-07 TL to protect wildlife habitat (Purgatoire Canyon) (Custer, Huerfano, and Las Animas Counties) RGFO RMP

RG-08 TL to protect deer and elk winter ranges RGFO RMP

RG-09 TL to protect wild turkey habitat RGFO RMP

RG-10 TL to protect bald eagle wintering habitat RGFO RMP

RG-12 TL to protect deer and elk winter ranges (Fremont, Lake, Chaffee, and Teller Counties) RGFO RMP

RG-13 TL to protect bighorn sheep winter range and lambing habitat RGFO RMP

RG-14 TL to protect elk calving habitat RGFO RMP

RG-17 NSO to protect Mexican spotted owl habitat RGFO RMP

RG-18 NSO to protect fen resource (SOUTH PARK ONLY) South Park Plan Amendment

RG-19 TL to protect mountain plover (SOUTH PARK ONLY) South Park Plan Amendment

CO-01 NSO to protect the integrity of existing coal mine operations RGFO RMP

CO-02 NSO to protect lesser prairie chicken habitat RGFO RMP

CO-03 NSO to protect raptor habitat - 1/8 mile RGFO RMP/MBTA

CO-04 NSO to protect bald eagle roosts or nests BGEPA

CO-05 NSO to protect peregrine falcon cliff nesting complex ESA

CO-06 NSO to protect Mexican spotted owl roosts and nests ESA

CO-07 NSO to protect waterfowl and shorebird habitat and rookeries MBTA

CO-16 TL to protect greater sandhill crane nesting and staging habitat MBTA

CO-17 TL to protect white pelican nesting and feeding habitat MBTA

CO-18 TL to protect raptor nesting and fledgling habitat MBTA

CO-19 TL to protect ferruginous hawk nesting and fledgling habitat MBTA

Num. / Type / Protection / Authority

CO-20 TL to protect osprey nesting and fledgling habitat MBTA

CO-21 TL to protect Mexican spotted owl nesting and fledgling habitat RGFO RMP/MBTA

CO-23 TL to protect bald eagle winter roost sites BGEPA

CO-24 TL to protect peregrine falcon cliff nesting complex RGFO RMP/ESA

CO-25 CSU to protect surface or underground coal mines RGFO RMP

CO-28 CSU to protect riparian/wetland vegetation RGFO RMP

CO-29 LN to alert lessee of Class I and II paleontological area inventory requirement PRPA

CO-34 LN to alert lessee of potential habitat for a threatened, endangered, candidate, or other special status plant or animal ESA

CO-39 CSU to protect cultural resources NHPA

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economically Recoverable vs. Technically Recoverable Oil and Gas

As BLM develops its RMP and Reasonable Foreseeable Development scenario for the Royal Gorge Field Office, it should base its analysis on economically recoverable oil and gas, not simply technically recoverable oil and gas. The economically recoverable resources are that part of the technologically recoverable resources that can be recovered with a profit. To be considered economically recoverable the market and non-market costs of gas recovery must be less than or equal to the gas price. When economic criteria are considered, the oil and gas actually recoverable drops significantly. Attanasi 1998; LaTourrete et al. 2002.

Research by economists at The Wilderness Society indicates that the federal government's assessments of the oil and gas resources on public lands are flawed and consistently over-estimate their value. Federal reports inappropriately use technically recoverable gas rather than economically recoverable gas in their conclusions, fail to consider improved access to gas from directional drilling and drill bit technology, and fail to examine access to existing gas reserves. The environmental costs of drilling include erosion, loss of wildlife and fish habitat, declines in the quality of recreational opportunities, proliferation of noxious weeds, and increased air and water pollution. These costs increase with the scale of oil and gas operations and when data are limited. Lease stipulations help protect wildlife but only if they are enforced, and data from BLM and other sources indicate that they are not. In the Rocky Mountain West, where hunting, fishing, and wildlife viewing generated $5.9 billion in revenue in 2001, drilling (and its direct impacts on wildlife and their habitat) has hidden economic costs in terms of lost revenues from license fees, equipment sales, and other related purchases. Morton et al. 2004; Morton et al. 2002.

If economics is not considered, the potential oil and gas will be overestimated as will the opportunity costs of protecting the wilderness character of public lands as well as all forms of environmental protection. For example, basing analysis on estimates of technically recoverable

resources will lead the agency to dramatically overestimate the impact of oil and gas development on employment (new job creation) in the region. Conversely, BLM will also likely overestimate the cost of lease stipulations, wilderness designation, and other protective measures if technically recoverable estimates are used. In studies looking at the impacts of lease stipulations on current gas supply, the Department of Energy has overestimated the adverse impacts because a large majority of the undiscovered gas, while perhaps technically recoverable, is not economical to extract. BLM should not make the same mistake.

If the oil and/or gas is not economical to extract, there is no adverse impact on gas supply from protecting wildlife, archeological sites, recreation sites and other public resources with leasing stipulations. Further, an EIS that relies on misleading economic information or fails to include all relevant costs in its economic analysis will violate NEPA, because it does not provide decision-makers and the public a valid foundation on which to judge proposed projects.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Recovery Rates for Undiscovered, Unconventional Oil and Gas

Economic recovery rates are even less for unconventional oil and gas resources (continuous-type gas and coal bed gas) than for the conventional resources. For continuous-type gas, only 7 and 15 percent of the technically recoverable gas is economic to find, develop and produce at $2.46/mcf and $4.11/mcf, respectively. Attanasi 1998. For continuous-type oil accumulations at $22.11 and $36.85 per barrel, about 7 percent and 50 percent, respectively, of the technically recoverable oil is economically feasible to exploit. Attanasi 1998. For unconventional coal bed gas, about 30 percent of the technically feasible gas is economically recoverable at $2.46 per mcf, while at $4.11 per mcf, the financial portion increases to slightly more than 50 percent. Attanasi 1998.

The Congressional Research Service (Corn et al. 2001) and most, if not all, economists agree that the policy relevant opportunity cost of an environmental regulation is the economically recoverable amount of gas – not the technically recoverable amounts. Shanley et al. (2004), who are veterans of the oil and gas industry, conclude with respect to natural gas in the Rockies, "it is likely that resource volumes are substantially overestimated, while the risks associated with finding and recovering those resources have most certainly been underestimated" – reinforcing the need to examine the economically recoverable amounts of gas and oil. As noted by LaTourrette, et al. (2002), economic constraints are in most cases the limiting factor on gas production in the Rocky Mountains, not environmental laws.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Companies take their stewardship responsibilities seriously and over the years have voluntarily taken on many projects to improve habitat throughout the West. BLM should recognize these efforts and their positive impact on wildlife species during development of the RMP/EIS.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

In 2008, Paul Denney, an oil and gas geologist and expert in the region, investigated surface gas seeps, water well depletion and chemical and methane contamination resulting from Petroglyph activities. He presents compelling evidence that previously undetected faults, "leaky dikes", and sand channels cross-cutting other aquifers comprise three possible pathways of vertical conductivity that could allow contaminants and fracking fluids to migrate in unexpected ways [15. Denney, Paul. Possible Pathways of Vertical Conductivity at the Petroglyph Little Creek Coalbed Methane Project, Walsenburg, Colorado, Nov. 2008, PowerPoint Presentation. http://www.scribd.com/doc/71350939/Paul-Denney-11-15-2008-Presentation (Paul Denney, residing in Pueblo County is a geologist with extensive experience in oil and gas exploration. He received a master's in geology from the University of Arizona in Tucson in 1968. Denney worked for major and small O&G exploration companies in the USA and SE Asia until 1994 when he became an independent consultant.)].

The text book "Subsurface Hydrology"[16. Pinder, G.F., and M.A. Celia. 2006. Subsurface Hydrology. New York: John Wiley and Sons.

http://www.wiley.com/WileyCDA/WileyTitle/productCd-0471742430,subjectCd-ES70.html] strongly reinforces the picture of the zones alongside dikes as being highly transmissive and potential conduits for contaminants:

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

From the evidence presented through the comments above, it is probable that the dikes of the Spanish Peaks area with their associated fractures can transport fluids between hydrocarbon bearing formations and groundwater, especially when they are disturbed by drilling and hydraulic fracturing. The concept of a confining zone breaks down in the presence of these characteristic igneous intrusions which penetrate and fracture the ancient layers of shale that may otherwise serve as impermeable barriers to fluid flow. In Huerfano County, the mixing of a methane reservoir and a drinking water surface aquifer suggested fracking near dikes as the cause (but it couldn't be proved because the wells were shut in).

B.1.25.4. Fluid Minerals - Oil and Gas - Reasonably Foreseeable Development Scenario

Total Number of Comments: 5

Summary

The RFD should reflect realistic exploration and development potential within the planning area and address all possible anticipated forms of energy development, including renewable energy development. The RFD should include an analysis of impacts from both vertical and horizontal wells; a mineral potential report; and the current extent and magnitude of federal mineral estate development, including location of existing federal mineral leases, and address how development will be similar or different in the future.

The BLM should use the RFD for the development and evaluation of resource conservation measures and to inform how to allocate land and transmission corridors.

A commenter expressed that the current RFD for the area does not uphold the standards as required by BLM Instruction Memorandum 2004-089.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

The Reasonable Foreseeable Development Scenario should address all possible forms of energy development anticipated within the ECRMP and should also include an analysis of impacts from both vertical as well as horizontal oil and gas drilling.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Discussion of the extent and magnitude of development of the Federal mineral estate within the ECRMP or within each of the proposed 4-5 landscape units of the ECRMP. Where will development be similar, or significantly different? Where are there existing leases for federal minerals? Where is there mineral development already occurring? Where is future mineral development most likely to occur? Included in this discussion should be findings of the BLM's Overall Mineral Potential Report for the ECRMP

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should develop a Reasonably Foreseeable Development Scenario for renewable energy and transmission to inform decisions in the Eastern Colorado RMP, including where and how to allocate land for renewable energy development and transmission corridors.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

As required by Chapter V, BLM must develop an RFD for the South Park MLP, which can be included in the RFD for the larger planning area. This information should then be used during the development and evaluation of "resource protection measures."

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Because of the clear importance of the RFD in the formation of an RMP, BLM policy requires it to be "based on a reasonable, technical, and scientific estimate of anticipated oil and gas activity based on the best available information and data at the time of the study." (BLM IM 2004-089, Attachment 1-3) The current Royal Gorge RFD does not uphold this standard and must be updated to reflect realistic exploration and development potential within the planning area.

B.1.25.5. Fluid Minerals - Oil and Gas - Split Estate

Total Number of Comments: 8

Summary

The BLM should address any differences in BLM's imposition of reclamation standards on split-estate and non-split-estate, and clarify whether BLM requires reclamation on split-estate lands and should require full reclamation in every instance. The BLM should also address access to split-estate lands.

Commenters posed the following questions regarding split-estate:

Is it conceivable that conservation easements taken on privately owned surface land could inhibit access to public minerals beneath those lands?

What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal changes in management of split-estate mineral leases and lands?

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Anadarko Petroleum Corp.

Commenter1:Nick Owens

Comment Excerpt Text:

Private Mineral Development

There is significant private mineral ownership within the planning area for which the BLM will ultimately need to address access and potential for federal mineral depletion.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recognizes that BLM's legal and management authority is limited to those portions of Northeast Colorado covered by either the Federal surface or subsurface mineral estate. However, there is likely to be occurrence of priority wildlife habitats on Federal surface estate that involves or crosses over onto state, local, or private surface estate. Guidelines for wildlife protection for split estate lands and adjoining state, local, or private lands should be provided, as well as

provisions for how management will differ on those lands as compared to management on lands in Federal surface and subsurface ownership.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

In general, CPW would like to ensure protections, to the extent possible, for sensitive fish and wildlife habitats and species on split estate lands. CPW is interested in working with BLM to identify processes or methods for how CPW can be engaged in pre-disturbance discussions with BLM and surface owners for protection of wildlife resources on split estate lands.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW recommends that BLM identify lands owned and/or operated by other recreational land management agencies and organizations such as Counties, Cities, and The Nature Conservancy; and which are also intersected by the Federal minerals estate. Such entities should be contacted to obtain their input concerning minerals development that may impact their operations.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must justify any assumptions regarding the reclamation of disturbed areas by addressing the rate of operator compliance with reclamation standards, timeliness of compliance, effectiveness of reclamation, and proposed or existing monitoring and enforcement mechanisms that assure successful reclamation. The EIS must also address any differences in BLM's imposition of reclamation standards on split estate and non-split estate lands. Presumably, "BLM has the authority to require the same mitigation on the private surface as it does on Federal lands." 75 However, the EIS for the Northeast RMP Oil and Gas Leasing Amendments notes that "[r]eclamation requirements on private surface lands are negotiated with the landowner and the oil and gas operator. For this reason, there is no certainty that the land would be returned to its

former condition." 76 The EIS must clarify whether BLM requires reclamation on split-estate lands, and indeed, should require full reclamation in every instance.

Commenter1:Julie Sumpter

Comment Excerpt Text:

It is conceivable that Conservation Easements taken on privately-owned surface land could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

The BLM should apply these measures to BLM managed surface acres and also work with stakeholders to develop a MLP that safeguards potential leasing on BLM managed subsurface acres (split estate) that coincide with important fish and wildlife habitat in South Park, including private lands where possible and areas managed by Colorado Parks and Wildlife and Colorado State Land board. There are considerable split estate lands within the potential MLP area, and they must be considered for the MLP to be most effective.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Thousands of acres of state managed public lands within the field office are managed as state wildlife management areas, and many of them include split estate lands with federal minerals. These landsprovide vitally important fish and wildlife habitat and offer hunters and anglers with unique sporting opportunities in the WRFO. We recommend that all state managed wildlife management areas with split estate minerals be managed as NSO or no lease to safeguard these crucial habitat areas.

B.1.25.6. Fluid Minerals - Oil and Gas - Impacts

Total Number of Comments: 79

Summary

Commenters expressed concerns for and called for BLM to analyze impacts from oil and gas development and associated actions and infrastructure on a variety of resources, including air quality and air quality-related values; climate change; wildlife impacts, including habitat destruction, habitat fragmentation, displacement, behavior, and population-level impacts; threatened, endangered, federally and state-listed and candidate species, and species of special concern (specific species mentioned include the mountain plover, raptors, sage-grouse, songbirds, aquatic species, and lesser prairie chicken); ecosystems; invasive species; water (including contamination and temperature and chemistry changes), including drinking water, surface water, groundwater, and aquifers; wetlands; seismicity; geology; naturally occurring radioactive

materials; night skies; visual resources and scenic quality; Thousand Peaks Ranch, particularly visual resources, property values, noise, and dirt roads; roads and road systems; access (e.g., to formerly remote areas); transportation; small bridges on State Route 9; viability of all other uses of federal lands; landscape of Colorado, such as the character and use of the land; waste disposal, treatment, and facilities; specially designated areas, such as ACECs, wilderness, and lands with wilderness characteristics; citizen-proposed specially designated areas; soundscape; ranching and cattle grazing; public health and safety; economy and socioeconomics; communities, including rural and urban environmental justice communities; farmers; owners of split-estate lands; and property values and property sales. Some commenters referenced studies supporting impacts on these areas.

Commenters in general are concerned about the risks associated from oil and gas development. The BLM should analyze impacts from contamination, particularly from transport, pipeline leakage, other accidents, and waste treatment and disposal. Many commenters are concerned about the impacts from unconventional oil and gas stimulation/activities (discussed further in Hydraulic Fracturing [Fracking]).

Commenters are concerned about impacts from coal mining, the social and economic costs of supporting infrastructure for oil and gas development, construction and operation of well pads and related facilities, opening remote areas with minimal or inadequate road networks, creating stipulations that may divert activities to adjoining private lands, methane leakage, and private mineral development within the area.

The BLM should analyze the potential beneficial use of horizontal and pad development technology to minimize environmental impacts and balance right of mineral owners to access property.

With regards to reclamation, the EIS should justify assumptions by addressing rate of compliance, timeliness of compliance, effectiveness of reclamation, and monitoring and enforcement. The BLM should evaluate the effectiveness and feasibility of setbacks.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Sierra Club

Commenter1:Harv Teitelbaum

Comment Excerpt Text:

The Resource Management Plan should recognize the comparative advantages of alternative energy sources such as wind generation and solar power, and the long-term harm done toward timely development of these more desirable and less destructive and toxic alternatives, on BLM and other relevant land, by the enabling of a single special industrial interest.

Commenter1:Jane Fasullo

Comment Excerpt Text:

The production of oil and gas, is releasing unnecessary volumes of greenhouse gases, many of which are also damaging to the health of living organisms including mankind.

Transporting oil in "oil trains" is explosively dangerous and prone to leaks and pollution of our lands and waterways.

Pipelines are also prone to leakage which also pollutes land and water bodies.

The water used to extract the oil and gas is dangerously polluted by the process. And like uranium rods, finding a "safe" way to dispose of it is still an unsolved challenge.

Organization1:Anadarko Petroleum Corp.

Commenter1:Nick Owens

Comment Excerpt Text:

Anadarko asks the BLM to include analysis for the following items: the potential impact of private mineral development within the area, the reasonable likelihood that hydraulic fracturing (which has been documented as a safe, reliable, and necessary to develop oil and gas mineral resources) will be used to develop the area's potential oil and gas mineral resources, and the potential beneficial use of horizontal and pad development technology to minimize environmental impacts and yet balance rights of mineral owners to access property.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Recent information indicates potential to cause levels of seismic activity that can trigger earthquakes, as well as possible contamination of shallow and deep level aquifers. Effective monitoring of this activity is critical and if extensive oil/gas production occurs on BLM lands in the future there should be advance requirements for effective monitoring that detects early seismic activity, as well as occurrence of water contamination.

Commenter1:Katherine Delanoy

Comment Excerpt Text:

I support a plan that provides for primitive backcountry recreation and protects the sights and sounds of nature, without intrusive noise and air quality depletion. We want to know that animals have not been driven out of their habitats by drilling.

Commenter1:Nicholas DiOrio

Comment Excerpt Text:

A primary concern of mine is that this area is being considered for oil and gas development at all. As our most intelligent and respected climate scientists tell us, no more oil and gas can safely be removed and burned without causing irreparable future damage to our environment due to rising carbon dioxide levels in the atmosphere. This pollution will continue to warm the Earth, causing drought, increased risk of extreme weather including wildfires, displacement of millions of people and potentially mass famine. These incredible risks should not be exacerbated by leasing public land for further exploitation by a handful of for-profit institutions with little interest in anything but their own profits. The high mountain parks are a national treasure and should be preserved for use by the community in recreation and for the diverse plants and animals that live there.

Commenter1:Nicholas DiOrio

Comment Excerpt Text:

In addition to climate change, oil and gas development profoundly affect surrounding areas and communities by introducing large quantities of toxic chemicals and dust, increased noise and traffic, and unsightly machinery and light pollution. South Park preserves beautiful swaths of wilderness which would be irreparably damaged by such development. It is possible that wildlife habitats would be destroyed, animals poisoned by spills, and the serene environment changed into yet another mineral extraction wasteland.

Commenter1:Karl Ford

Comment Excerpt Text:

A study conducted over three years by the Colorado School of Public Health concluded that hydraulic fracturing can contribute to "acute and chronic health problems for those living near natural gas drilling sites". The report, published in Science of the Total Environment found those living within a half-mile of a natural gas drilling site faced greater airborne health risks than those who live farther away (McKenzie et al, 2012, CSPH 2011). Researchers detected potentially toxic petroleum hydrocarbons in the air near the wells including benzene, trimethylbenzenes, and xylenes. Benzene is classified as a known carcinogen by the EPA. The same authors published a study in Environmental Health Perspectives showing increased congenital heart defects and neural tube defects with proximity to natural gas development in rural Colorado (McKenzie et al 2014). A 2013 study published in Endocrinology, "Estrogen and Androgen Receptor Activities of Hydraulic Fracturing Chemicals and Surface and Ground Water in a Drilling-Dense Region", found water samples near Colorado gas drilling sites using hydraulic fracturing showed the presence of chemicals linked to infertility, birth defects, and cancer, at higher levels than areas where hydraulic fracturing was not taking place (Kassotis et al 2013). The study also found elevated levels of the hormone-disrupting chemicals in the Colorado River, where wastewater released during accidental spills at nearby wells could wind up. A related study in found the introduction of Pennsylvania shale gas drilling increased low birth weight and decreased term birth weight on average among mothers living within 2.5 km of a well compared to mothers 2.5 km of a future well (Hill 2013). Another 2014 Environmental Health Perspectives epidemiological study of residents living near unconventional natural gas wells in Pennsylvania found the number of reported health symptoms per person was higher among residents living <1 km compared with >2 km from the nearest gas well. In a model that adjusted for age, gender, household education, smoking, awareness of environmental risk, work type, and animals in house, reported skin conditions were more common in households <1 km compared with >2 km from the nearest gas well. Upper respiratory symptoms were also more frequently reported in persons living in households less than 1 km from gas wells (39%) compared to households 1-2 km or >2 km from the nearest well (31 and 18%, respectively) (p=0.004). No equivalent correlation was found between well proximity and other reported groups of respiratory, neurological, cardiovascular, or gastrointestinal conditions Rabinowitz et al 2014). Researchers collected data in Garfield County, CO from January 2008 to November 2010, using EPA air quality standards. The study reiterates earlier research which shows that prolonged exposure to airborne petroleum hydrocarbons causes "an increased risk of eye irritation and headaches, asthma symptoms, acute childhood leukemia, acute myelogenous leukemia, and multiple myeloma (McKenzie, 2012).These scientific papers show a history of public health exposure and effects from fracking. A 2014 Environmental Health Perspectives paper by a National Institutes of Environmental Health Science workgroup surveyed

the scientific literature and concluded that a potential for water and air pollution exists that might endanger public health, and that the social fabric of communities could be impacted by the rapid emergence of drilling operations. [Penning et al 2014]. How can BLM ensure that public health will be protected? Will BLM monitor air quality emission during each well drilling and fracking operations? Do not expect the state to do so. The Royal Gorge Field Office Manager said at the Golden Scoping public meeting there is currently one technician to inspect all the well field operations and that "2-3 others will be hired." How many wells exist or have an APD on public land and how many wells exist or have an APD on federal mineral under RGFO jurisdiction? Will they be trained in air and water quality monitoring?

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

Finally, we want you to consider this when drafting your proposal: We and our neighbors are all owners of split estates, so that we do not own the mineral rights, and hence you are not going to make some cattle rancher an overnight millionaire by putting Thousand Peaks Ranch up for lease. Instead, we and our neighbors would have to foot the financial and emotional bill of making someone else rich. There are other properties in south Park County where mining is already permitted under County ordinance. Do it there. Even if we did own the mineral rights, we would have no interest in leasing them. There may be one lot in Thousand Peaks Ranch owned by BLM. It is surrounded by agricultural and residential properties, and we have the same concerns regarding that lot.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

B. Visitors to our property say, "You have a million-dollar view." (While this illustrates the point, our opinion is that in dollar terms it is worth far more.) We selected our lot because it overlooked adjoining Antero Reservoir, as well as unobstructed views of the Collegiate Peaks, the Buffalo Peaks and other magnificent mountains. In legal terms, we believe we have a scenic easement to protect those views. Use of our land for oil, gas, or mineral exploration, or such use of properties within our view, would devalue our property rights dramatically, including that scenic easement.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

D. As pointed out above, we overlook Antero Reservoir. The land on our portion of Thousand Peaks, including Antero Drive, slopes radically down toward Antero Reservoir. Given the amount of rain, for example in our area in the last several months, it would be impossible to contain all runoff from oil, gas, and mineral exploration from going into Antero Reservoir, a major water source for Denver as well as a major recreation area. Then too, fracking in our area would disturb underground radiation sources and pollute our well water, quite apart from any toxic chemicals used by the fracking company. In other words, if you frack or otherwise disturb rock containing radioactive material, that rock's fractured powder will become suspended in our well water sources and possibly in Antero Reservoir as well.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

E. By allowing unsightly and noisy equipment operation, as well as extensive trucking equipment operation in our area, you would take the value of our property (its scenic beauty and quietness, etc.) without just compensation under the United States Constitution. We are very familiar with the oil and gas industry, and certainly are also acutely aware of mineral extractions' damaging effects on nearby property owners.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

F. As indicated earlier, Thousand Peaks Ranch only has dirt roads, many of which cross adjoining streams that threaten to wash those roads out in times of heavy snow melt (like this Spring and Summer) and heavy rains. We live 15 minutes off the nearest paved road (State Route 9), which itself has also been closed at points this year due to concern by the Colorado Department of Transportation that bridges might wash out. There are a number of very small bridges on State Route 9 that we use to enter Thousand Peaks Ranch, which were not built to withstand the kind of heavy truck traffic needed to support oil/gas and mineral exploration. Another nearby road, State Highway 285, was dosed for several days this year because of flooding concerns. Highways 9 and 285 are just the ones you would have to use to obtain access to Thousand Peaks Ranch for oil, gas, and mineral extraction.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

G. Merely advertising Thousand Peaks for possible leases would have a severe impact on our property values and enjoyment. We are generally familiar with the fact that brokers can lease these properties from the BLM for a few dollars an acre, stake out exploration sites, and by that very action impede sales of properties in Thousand Peaks Ranch, regardless of whether extraction ever took place. No one wants to take the risk of spending hundreds of thousands of dollars for an existing home, or like us, spend a great deal of time, effort, and expense building a new home, if there is an obvious risk to that action -living next to an extremely noisy oil or gas facility or seeing and hearing hundreds of trucks thunder by on their way to a job site.

Commenter1:Tony Greiner

Comment Excerpt Text:

Don't turn eastern Colorado into the fossil fuels pockmark that is north western New Mexico. Learn from our mistake, keep Colorado beautiful, it will bring in far more state revenue in the long run.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Air Quality and Air Quality Related Values. The NPS looks forward to working closely with the BLM in the planning process, as a cooperating agency, and also under the Memorandum of Understanding Among the U.S. Department of Agriculture, U.S. Department of the Interior and the U.S. Environmental Protection Agency Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the NEPA Process (June 2011). The agreement

outlines how the agencies, including the NPS and BLM, will work together to address air quality impacts and mitigation from Federal on-shore oil and gas planning, leasing, or field development including exploration, development, and production decisions. It specifically provides procedures to follow for assessing impacts related to air quality and air quality related values (AQRVs), like visibility and air pollution

Commenter1:Kate Toan

Comment Excerpt Text:

Oil and gas development causes multiple types of harm to human health, safety, welfare, and the environment. These harms have been denied by industry, but the evidence is overwhelming. Oil and gas development releases toxic and climate changing compounds into the air, contaminates ground and surface water, requires hundreds of thousands of miles of new roads, and disposal of wastes associated with oil and gas development causes additional pollution and earthquakes. The leasing of federal lands for oil and gas development is not in the best interest of the public for whom these lands are managed, and is not consistent with maintaining other multiple use goals such as protecting threatened and endangered wildlife. Oil and gas development contributes so significantly to climate change that allowing it to occur on federal land is fundamentally incompatible with the notion of managing our lands for continued enjoyment.

Climate change is causing increased drought, fire, flood, species migration, species extinction, and threatens humans food supply, water availability, and physical security. It is impossible to avoid the impacts of climate change unless we reduce or eliminate oil and gas development, and nowhere is this more possible than on our federally managed lands. The federal government, including the BLM, must begin to reject oil and gas development as a legitimate multiple use, as it threatens the continued viability of all other uses of our federal lands.

Commenter1:Jim Engelking

Comment Excerpt Text:

Colorado's public lands should be managed for mulitple use and protected for the enjoyment of the public - not the exploitation of the oil and gas industry which prevents multiple use and hatms the lands, sometimes permanently.

Commenter1:Carolyn Usher

Comment Excerpt Text:

Last year there were upwards of 500 fracking accidents around Colorado. We've already lost much of our BLM land to fracking on the western slope when no one was looking.

Commenter1:Bianca Abeyta

Comment Excerpt Text:

Have you noticed the increasing earthquakes in Oklahoma? I believe they are the side effects of massive fracking. The Trinidad area is also having earthquakes near the fracking sites. Fracking isn't safe, the procedure's damage is not likely repairable.

Commenter1:R. Burghilde

Comment Excerpt Text:

Fracking has been linked to polluted water, air and more recently earthquakes.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Expansion of fossil fuel production will substantially increase the volume of greenhouse gases emitted into the atmosphere and jeopardize the environment and the health and well being of future generations. In order to avoid catastrophic climate change, BLM should be looking for ways to reduce, rather than increase, greenhouse gas emissions. A no-leasing alternative is not only reasonable but also imperative.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

In comparing a no-leasing-no-fracking alternative to leasing and continued unconventional well development scenarios, the EIS should include a health impact assessment, or equivalent, of the aggregate impact that unconventional extraction techniques, including fracking, will have on human health and nearby communities

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Without further restrictions on oil and gas development near schools and residences, health risks to children and other vulnerable populations will only increase with increased oil and gas drilling. The EIS must fully assess the risk to local communities, including vulnerable populations [from the chemicals used in fracking and other oil/gas operations].

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

identify issues that must be addressed in the RMP and EIS, including (1) the climate change impacts of new fossil fuel development; (2) the ecological and public health impacts of unconventional oil and gas well stimulation, including hydraulic fracturing; and (3) similar impacts with respect to coal mining.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Increased oil and gas extraction and production have the potential to dramatically and permanently change the landscape of Colorado. Countless acres of land may have to be leveled to allow for the construction and operation of well pads and related facilities such as wastewater pits. Roads may have to be constructed or expanded to accommodate trucks transporting chemicals and the large quantities of water needed for some recovery methods. Transmission lines and other utilities may also be required. The need for new distribution, refining, or waste treatment facilities will expand industrial land use. With new roads and other industrial infrastructure, certain areas could open up to new industrial or extractive activities, permanently changing the character and use of the land.

The conversion of substantial acreages from rural or natural landscapes to industrial sites will also mar scenic views throughout the planning area. Given BLM's failure to ensure full reclamation of idle wells and the difficulty of restoring sites to their original condition, scenic resources may be permanently impaired.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

BLM should conduct a full assessment of the direct and indirect impacts of unconventional oil and gas development activities on wildlife and ecosystems through a suite of comprehensive studies on all species and ecosystems that could be affected. The studies should be particularly detailed for federally and state listed species, federal and state candidates for listing, and state species of special concern. The studies should address the following impacts:

(1) habitat loss, degradation, and fragmentation, including edge effects; (2) water depletion; (3) air and water contamination; (4) introduction of invasive species; (5) climate change impacts; (6)

health and behavioral effects such as increased stress and changes in life history behaviors; (7) changes in demographic rates such as reproductive success and survival; and (8) potential for population-level impacts such as declines and extirpations. These studies should consider these harms individually and cumulatively

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Oil and gas development has been linked to population-level impacts on wildlife, including lower reproductive success of sage grouse and declines in the abundance of songbirds and aquatic species. For example, young greater-sage grouse avoided mating near infrastructure of natural-gas fields, and those that were reared near infrastructure had lower annual survival rates and were less successful at establishing breeding territories compared to those reared away from infrastructure. 190 In Wyoming, an increasing density of wells was associated with decreased numbers of Brewer's sparrows, sage sparrows, and vesper sparrows. 191 In the Fayetteville Shale of central Arkansas, the proportional abundance of sensitive aquatic taxa, including darters, was negatively correlated with gas well density. 192 The EIS must consider the population-level impacts that oil and gas development may have on wildlife in Colorado.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Anthropogenic climate change poses a significant threat to biodiversity. Climate disruption is already causing changes in distribution, phenology, physiology, genetics, species interactions, ecosystem services, demographic rates, and population viability: many animals and plants are moving poleward and upward in elevation, shifting their timing of breeding and migration, and experiencing population declines and extinctions.185 Because climate change is occurring at an unprecedented pace with multiple synergistic impacts, climate change is predicted to significantly increase extinction risk for many species. The IPCC concludes that it is extremely likely that climate change at or above 4°C will result in substantial special extinction.186 Other studies have predicted similarly severe losses: 15-37 percent of the world's plants and animals committed to extinction by 2050 under a mid-level emissions scenario [Thomas, C.D. et al., Extinction Risk from Climate Change, 427 Nature 8:145 (2004)]; the extinction of 10 to 14 percent of species by 2100 if climate change continues unabated.[Maclean and Wilson 2011] Another recent study predicts the loss of more than half of the present climatic range for 58 percent of plants and 35 percent of animals by the 2080s under the current emissions pathway, in a sample of 48,786 species.189 Because expansion of oil and gas production in Colorado will substantially increase the emissions of greenhouse gases, this activity will further contribute to the harms from climate change to wildlife and ecosystems

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Invasive species may be introduced through a variety of pathways that would be increasingly common if oil and gas activity is allowed to expand. Machinery, equipment, and trucks moved from site to site can carry invasive plant species to new areas. In addition, materials such as crushed stone or gravel transported to the site from other locations may serve as a conduit for invasive species to migrate to the well site or other areas en route. Aquatic invasive species may also spread more easily given the large amounts of freshwater that must be transported to accommodate new drilling and extraction techniques.

These species may be inadvertently introduced to new habitats when water is discharged at the surface. Alternatively, hoses, trucks, tanks, and other water use equipment may function as conduits for aquatic invasive species to access new habitats

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must take into account the impact of both unpermitted, illegal waste pits as well as those that are regulated

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Water depletion can also affect species whose habitats are far removed from the actual well site. Because of the high volume of water required for even a single well that uses unconventional extraction methods, the cumulative water depletion could have a significant impact on species that rely on water sources that serve to supply oil and gas operations. In addition, water depletion can adversely impact water temperature and chemistry, as well as amplify the effects of harmful pollutants on wildlife that would otherwise be diluted without the depletion.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Oil and gas development creates a network of well pads, roads, pipelines, and other infrastructure that lead to direct habitat loss and fragmentation, as well as displacement of wildlife from these areas due to increased human disturbance. Habitat loss can occur as a result of a reduction in the total area of the habitat, the decrease of the interior-to-edge ratio, isolation of one habitat fragment from another, breaking up of one habitat into several smaller patches of habitat, and decreasing the average size of a habitat patch. New research has revealed the extent of this habitat loss. For example, in the western United States, the amount of high-quality habitat for the pronghorn has shrunk drastically due to oil and gas development.174

The indirect effects from unconventional oil and gas development can often be far greater than the direct disturbances to habitat. The impacts from the well site—including noise, light, and pollution-- extend beyond the borders of the operation site and will consequently render even greater areas uninhabitable for some wildlife. Species dependent on having an “interior” habitat will lose their habitat as operation sites or other infrastructure fragment previously buffered and secluded areas. These and other indirect effects can be far greater than the direct disturbances to land. In the Marcellus shale of Pennsylvania, for instance, research shows that 8.8 acres of forest on average are cleared for each drilling pad along with associated infrastructure, but after accounting for ecological edge effects, each drilling station actually affected 30 acres of forest.175 While individual well sites may cause some disturbance and destruction, the cumulative impacts of oil and gas production using unconventional methods must receive attention as well.

While the actual well pads may only occupy a small proportion of a particular habitat, their impact can be much greater when their aggregate impact is considered. As discussed above, interior habitats will be destroyed by removing the buffer between the interior habitat and the operation site

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The analysis should assess the following issues based on guidance from the scientific literature, the National Research Council,169 and the Department of Energy170:

(1) whether existing oil and gas wells and wastewater injection wells in the area covered by the RMP have induced seismic activity, using earthquake catalogs (which provide an inventory of earthquakes of differing magnitudes) and fluid extraction and injection data collected by industry;

(2) the region's fault environment by identifying and characterizing all faults in these areas based on sources including but not limited to the USGS Quaternary Fault and Fold database and the most recent Colorado Geological Survey Fault Activity Map GIS layer. In its analysis, BLM should assess its ability to identify all faults in these areas, including strike-slip faults and deep faults that can be difficult to detect;

(3) the background seismicity of oil- and gas-bearing lands including the history of earthquake size and frequency, fault structure (including orientation of faults), seismicity rates, failure mechanisms, and state of stress of faults;

(4) the geology of oil- and gas-bearing lands including pore pressure, formation permeability, and hydrological connectivity to deeper faults;

(5) the hazards to human communities and infrastructure from induced seismic activity; and

(6) the current state of knowledge on important questions related to the risk and hazards of induced seismicity from oil and gas development activities, including:

(a) how the distance from a well to a fault affects seismic risk (i.e., locating wells in close proximity to faults can increase the risk of inducing earthquakes);

(b) how fluid injection and extraction volumes, rates, and pressures affect seismic risk;

(c) how the density of wells affects seismic risk (i.e., a greater density of wells affects a greater volume of the subsurface and potentially contacts more areas of a single fault or a greater number of faults);

(d) the time period following the initiation of injection or extraction activities over which earthquakes can be induced (i.e., studies indicate that induced seismicity often occurs within months of initiation of extraction or injection although there are cases demonstrating multi-year delays);

(e) how stopping extraction or injection activities affects induced seismicity (i.e., can induced seismicity be turned off by stopping extraction and injection and over what period, since studies indicate that there are often delays—sometimes more than a year—between the termination of extraction and injection activities and the cessation of induced earthquake activity);

(f) the largest earthquake that could be induced by unconventional oil and gas development activities in areas covered by the RMP, including earthquakes caused by wastewater injection; and

(g) whether active and abandoned wells are safe from damage from earthquake activity over the short and long-term

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The proliferation of unconventional oil and gas development, including increases in extraction and injection, will increase earthquake risk in Colorado. Accordingly, the EIS must fully assess the risk of induced seismicity cause by all unconventional oil and gas extraction and injection activities, including wastewater injection wells

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

If oil and gas development is allowed to proliferate in the planning area, increased unconventional oil and gas extraction and underground waste injection will increase the risk of induced seismicity. Induced seismic events could damage or destroy property and cause injuries or even death, especially in a state where earthquakes are rare and communities are typically not prepared for them. A no-leasing-no-fracking alternative would minimize these risks, while continued leasing and unconventional well development would increase them.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Given the potential for radioactive substances to be present in treated wastewater and the high potential for accidental spills and releases, the EIS should assess the amount, the type, and the potency of radioactive elements that are naturally occurring in the landforms subject to the RMP and evaluate the likely risks that stem from bringing such materials to the surface. This analysis should address how radioactive materials could impact the specific areas in which wastewaters are treated, disposed, or accidentally released.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should also study the human health and safety impacts of noise pollution, light pollution, and traffic accidents resulting from oil and gas development.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must weigh the no-leasing-no-fracking alternative's climate-change benefits against the impacts of allowing new leasing and fracking

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

BLM should perform a full analysis of all gas emissions that contribute to climate change, including methane and carbon dioxide. The EIS should calculate the amount of greenhouse gas that will result on an annual basis from (1) each of the fossil fuels that can be developed within the planning area, (2) each of the well stimulation or other extraction methods that can be used, including, but not limited to, fracking, acidization, acid fracking, and gravel packing, and (3) cumulative greenhouse gas emissions expected over the long term (expressed in global warming potential of each greenhouse pollutant as well as CO2 equivalent), including emissions throughout the entire fossil fuel lifecycle

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

BLM should similarly recognize that the environmental and public health hazards of these increasingly widespread extraction techniques are too great to continue allowing them to be used in the planning area. These risks include contamination of water resources and increased surface runoff, over-depletion of dwindling water resources, deterioration of air quality, human health and safety risks, radioactive contamination, induced seismicity, harm to wildlife, and industrialization of landscapes and changes in land use

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should evaluate how often accidents can be expected to occur, and the effect of chemical and fluid spills. Such analysis should also include identification of the particular harms faced by communities near oil and gas fields.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should examine and quantify the risks to human health and the environment associated with on-site chemical and wastewater storage, including risks from natural events and negligent operator practices. Again, such analysis must also include an analysis of potential impacts faced by environmental justice communities in both rural and urban settings

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Studies have reported many instances around the country of groundwater contamination due to surface spills of oil and gas wastewater, including fracking flowback.54 Fracking and other unconventional techniques likewise pose inherent risks to groundwater due to releases below the surface, and these risks must be properly evaluated.55

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should study the rates of well casing failures over time and evaluate the likelihood that well casing failures can lead to groundwater contamination

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must consider long-term studies on the potential for fluid migration through newly created subsurface pathways. Fluid migration is of particular concern when oil and gas operations are close to drinking water supplies.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

In some areas hydraulic fracturing may occur at shallower depths or within the same formation as drinking water resources, resulting in direct aquifer contamination. 68 The EIS must disclose where the potential for such drilling exists.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Setbacks may not be adequate to protect groundwater from potential fracking fluid contamination. A recent study by the University of Colorado at Boulder suggests that setbacks of even up to 300-feet may not prevent contamination of drinking water resources.69 The study found that 15 organic compounds found in hydraulic fracturing fluids may be of concern as groundwater contaminants based on their toxicity, mobility, persistence in the environment, and frequency of use. These chemicals could have 10 percent or more of their initial concentrations remaining at a transport distance of 300 feet, the average "setback" distance in the U.S. A review of the Royal Gorge and Northeast Colorado RMPs reveals no minimum distance at which oil and gas operations must be sited from underground drinking water sources. The effectiveness and feasibility of any setbacks considered as part of the PRMP must be evaluated.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

--leaching from landfills that receive drilling and fracking solid wastes;

--spreading of drilling and fracking wastes over large areas of land;

--wastewaters discharged from treatment facilities without advanced "total dissolved solids" removal processes, or inadequate capacity to remove radioactive material removal; and

--breaches in pits or underground disposal wells.70

The EIS must evaluate the potential for contamination from each of these disposal methods

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must analyze where water will be sourced, how much, and the effects on water sources under different alternatives. All of these effects must be analyzed in the context of increasing water scarcity in Colorado due to climate change, drought, and increasing population growth.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Withdrawing water from streams will decrease the supply for downstream users, such as farmers or municipalities. Rising demand from oil and gas operators has already led to increased competition for water between farmers and oil and gas operators. In some regions of the state, farmers have had to fallow fields due to astronomical water prices.85 For example, in prior years, farmers in Colorado have paid at most $100 per acre-feet of water in auctions held by cities with excess supplies, but in 2013 energy companies paid $1200 to $2,900 per acre-feet.86

Reductions in stream flows may also lead to downstream water quality problems by diminishing the water bodies' capacity for dilution and degradation of pollutants. The EIS must examine these issues.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Decreasing the volume of streamflow and stream channels by diverting water to fracking would have a negative impact on the environment and should be included in the EIS

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The ecological importance of wetlands is unquestionable, and their full protection is paramount. The EIS must analyze these potential impacts to wetlands, and the related, potential indirect impacts that may stem from such impacts.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Permitting fracking and other well stimulation techniques will greatly increase the release of harmful air emissions in these and other regions.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should study the potential for oil and gas operations sites in the planning area to emit such air toxics and any other pollutants that may pose a risk to human health, paying particular attention to the impacts of air pollution on environmental justice communities that already bear the burden of disproportionately high levels of air pollution

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS should incorporate a literature review of the harmful effects of each of these chemicals known to be used in fracking and other unconventional oil and gas extraction methods. Without knowing the effects of each chemical, the EIS cannot accurately project the true impact of unconventional oil and gas extraction.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

Traffic associated with oil and gas exploration and drilling may impact recreational travel and travel management. The BLM should also consider the impact of opening remote areas with minimal or inadequate road networks, including the impacts of upgrading the roads to the point where they could service this intensive activity.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

5. Socioeconomic Impacts

The BLM should recognize that the economic benefits of oil and gas development are lessened by certain factors. Oil and gas development imposes a number of burdens on local communities and local government. See https://www.springsgov.com/units/boardscomm/OilGas/DOLA%

20O&G%20Guide%20for%20Local%20Governments.pdf The development of an oil or gas field imposes significant immediate burdens on local governments, which must pay "up front" for the road improvements and increased public services needed during the exploration and development phase, but which typically receive additional revenues from taxes and royalties only after wells begin producing. This problem is particularly acute in rural counties with undeveloped public infrastructure. See http://energy.duke.edu/sites/default/files/attachments/Oil%20Gas%20Revenue%20Allocation%20to%20Local%20Government%20FINAL.pdf (analyzing the allocation of oil and gas revenues among various governmental units in 18 states, including Colorado). In the current low-price economic environment, much of the oil and gas that are technologically reoverable may not be economically feasible to develop, reducing the positive economic benefits to communities and increasing the risk that a perceived "boom" will be short-term or never materialize, so that the anticipated revenues to pay for public infrastructure improvements may not be received.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

The BLM must consider the effect of federal restrictions such as "no surface occupancy" on adjoining private land to which the restricted activities may be diverted. Many of the values which the BLM would seek to protect, such as scenic values, quiet recreational enjoyment, absence of an intensive human presence, and preservation of wildlife or particular species of concern, will continue to be seriously impacted if intensive oil and gas activities are moved onto adjacent private land. Furthermore, where restrictions on activities integral to oil and gas exploration and development are considered necessary to protect federal lands from oil and gas impacts, the BLM must also consider whether transferring these activities and the consequent impacts to adjoining private land will unfairly burden landowners or the public with the same impacts which the BLM has identified as unacceptable on federal lands. The BLM should recognize that private

owners consider many of these same values: scenic vistas, quiet and solitude, clean air and water, to be crucial to the enjoyment of their own property. An unwilling surface owner should not be required to accept impacts which the federal government would consider unacceptable if they were to take place on federally-owned surface land .

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

The BLM should recognized that property values for residential property may be decreased as a result of nearby oil and gas operations due to factors such as an impaired viewshed, concerns regarding health risks, and traffic on rural or residential roads. These impacts may be felt both with respect to adjoining private land, in cases where the federal government owns both the surface and mineral estate, and with respect to private surface lands where the federal government owns only the mineral estate.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

7. Protected and Special Use Areas

The BLM must give due regard to the impact of oil and gas development on lands with special designations. Oil and gas development in currently roadless or undeveloped areas would destroy the undeveloped and undisturbed character of such areas. Such activity would degrade wildlife habitat and possibly affect water quality, and make any affected roadless area unattractive for primitive forms of recreation. The BLM should consider impacts of oil and gas operations not only on existing Areas of Critical Environmental Concern and Recreation Management Areas, Wilderness Study Areas, and areas which the BLM recognizes as Lands with Wilderness Characteristics, but also additional citizen-proposed areas. We note that Wild Connections and The Wilderness Society have identified a large acreage of additional lands which seem to possess wilderness characteristics, beyond those identified in the BLM's own survey and have also proposed a number of additional ACECs. These characteristics and environmental factors would make such lands unsuitable for oil and gas development. These lands should be classified as not open to oil and gas development, rather than being open with restrictions.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

The BLM must take proper account of areas containing threatened or endangered species. We note in particular the lesser prairie chicken, since some of its habitat and potential habitat near the Kansas and New Mexico borders appears to overlap with lands in which the federal government holds a subsurface mineral interest. See Southern Great Plains Crucial habitat Assessment Tool, a description of which can be found at: http://kars.ku.edu/geodata/maps/sgpchat/. With regard to more common species, the BLM must take into account impacts resulting from habitat fragmentation due to intensive oil and gas development. See http://wilderness.org/resource/

analysishabitatfragmentationoilandgasdevelopmentanditsimpactwildlifeframework. We note that in its scoping comments, the Wilderness Society has identified a number of wildlife corridors and Wildlife Emphasis Areas which may require protective conditions inconsistent with oil and gas development.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

The BLM must consider the impacts of rapid oil and gas development in accelerating long-term climate change. While it has been suggested that natural gas is a more desirable fossil fuel because it produces fewer greenhouse gases when burned, studies have indicated that the release of methane, a more potent greenhouse gas, from oil and gas operations, largely if not entirely negates this advantage. E.g., http://www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf We note that the Environmental Protection Agency is presently proposing rules to require energy companies to report methane emissions from their various operations, but at present no such requirement exists.

http://www.scientificamerican.com/article/epamovestocountmethaneemissionsfromfracking/

However, what can be clearly said is that opening new fields will result in release of additional greenhouse gases and this is a factor which should be considered in weighing the impacts of designating BLM lands as suitable for oil and gas production. Secretarial Order No. 3289 clearly requires the BLM to analyze climate change impacts in its long-term planning. Oil and gas operations must be adequately bonded. The fact that a particularly high bond would be considered necessary in order to protect other resources should be considered in making the determination of whether an area is appropriate for oil and gas development.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

1. Air Quality Issues

In deciding whether particular areas should be open to oil and gas operations, the BLM should consider the impact on regional air quality. Much of Front Range is at risk for air quality nonattainment status. Studies conducted by NOAA and the Cooperative Institute for Research in Environmental Sciences have documented that oil and gas operations emit more pollutants than previously estimated http://research.noaa.gov/News/NewsArchive/LatestNews/TabId/684/ArtMID/1768/ArticleID/10356/NOAAledstudyColoradooilandgaswellsemitmorepollutantsthanexpected.aspx and are the dominant

wintertime source of gases contributing to ozone pollution along the Front Range http://cires.colorado.edu/news/press/oilandgaswellscontributefuelozonepollution.

See generally http://cires.colorado.edu/news/press/oilgas for additional studies.

Practices such as open disposal pits increase air pollution and have been linked to ozone pollution.

See http://insideenergy.org/2014/10/03/oilandgaswastewaterlinkedtoozonepollution/. In areas where air quality has been seriously impacted oil and gas operations, or where the region is at risk of becoming an air quality nonattainment area, the BLM should impose conditions which forbid practices which increase emissions. However, according to a recent study, emission capture controls on industry facilities have had little effect in reducing its impact upon the Front Range. http://www.denverpost.com/business/ci_26926908/emissionsrulesyieldlittlebenefitalongcoloradofrontrange. In considering whether to open an area to oil and gas development, the BLM should consider whether this emissions rules study suggests that opening an area even with such major restrictions will be ineffective in preventing a regional deterioration of air quality

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

Because there is a glut of natural gas, of considerably longer duration that the more recent glut of oil, oil and gas exploration in recent years has focused on development of oil resources. There has been little financial incentive for operators to capture and market the natural gas which is produced as a byproduct of oil extraction. The BLM should consider whether lands remote from natural gas pipelines and collecting facilities are rendered unsuitable for oil exploration and development, or whether the should be considered suitable for exploration only with attached conditions requiring capture of natural gas. Otherwise, development in these areas would particularly exacerbate the problem of global climate change due to the release of methane or the flaring of natural gas incidentally produced in oil production

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

2. Water Quality Issues

Pollution of Surface Waters. Oil and gas operations intrinsically pose a number of risks to surface waters, including the risk from accidental spills at the drill site or in transporting drilling fluids to, or waste materials from, the site, and risks posed by locating drilling sites or other oil and gas infrastructure in flood-prone areas. Certain practices, such as the use of open containment ponds, increase the risk of surface water contamination. The use of hydraulic fracturing technology greatly increases these risks, since large quantities of fracking fluids, upwards of a million gallons, must be trucked or piped to the drill. Fluids returning to the surface as pressure is released must be removed from the site and disposed of. See generally http://www.denverpost.com/news/ci_27313213/coloradohadmorethan700oilandgas (noting over 700 spills of more than one barrel of oil in Colorado in 2014; noting risks from transport of fluids and leaking or overflow of containment ponds).

Impacts to Aquifers and Drinking Water. It appears that the technique of hydraulic fracturing poses new and poorly analyzed impacts to aquifers. We recommend that the BLM study the draft EPA study on impacts of hydraulic fracturing on drinking water and the final study when it is

released. See http://www2.epa.gov/hfstudy. This study notes impacts not only from risk of aquifer contamination, but also because the practice puts a substantial burden on existing water supplies. We also suggest that the BLM note the uncertainties recognized in the study, which states that due in part to the inaccessibility of needed data on fracking activities and their potential impact, analysis of the risk is difficult. The BLM should consider potential impacts on water resources in areas which are being considered for oil and gas development.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

3. Seismic risks.

It is well established that deep well injection of fracking waste fluids has produced earthquakes, often at a distance of several kilometers from the injection site. See http://earthquake.usgs.gov/research/induced/. Although the focus of concern to date has been on deep well injection as a cause of earthquakes, there is also evidence that the practice of hydraulic fracturing itself can stimulate earthquakes, a concern which has led to suspension of fracking activities at particular sites. See http://powersource.postgazette.com/powersource/consumerspowersource/2015/01/05/Frackingcausedearthquakesinexistingfaultsnewstudysays/stories/201501050144 The BLM should consider geological evidence of seismic risk in determining which areas are suitable for oil and gas development and should close areas close to known fault lines.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

Oil and gas operations can adversely impact ranching and cattle grazing in the vicinity of the

operations. Studies have linked pet and livestock deaths to oil and gas operations. See

http://news.cornell.edu/stories/2012/03/reproductiveproblemsdeathanimalsexposedfracking

As this study points out, industry secrecy and settlement practices make this risk difficult to assess.

Commenter1:Julie Sumpter

Comment Excerpt Text:

What quantitative benefits or impacts to communities, economies or the tax base will be realized if access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Decision?

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM Should Conduct a Health Impact Assessment as part of the Eastern Colorado RMP to ensure decisions made in the RMP are protecting human health in eastern Colorado communities.In February, 2008, the Environmental Protection Agency provided the BLM with its comments on a revised drilling plan for the Pinedale Anticline in Wyoming, citing concerns about human health issues including elevated ozone levels and groundwater contamination, as well as visibility impacts in nearby Wilderness Areas. Consistent with its responsibilities under Section 309 of the Clean Air Act, EPA reviewed the analysis of impacts and gave the plan its worst possible rating. EPA recommended that BLM revise the plan to correct the problems identified by EPA. In its decision, the EPA stated: "[I]t is of utmost importance that the Revised Draft SEIS identify effective and enforceable mitigation strategies to ensure environmental and public health protection as the proposed 4,399 additional wells on the Pinedale Anticline are developed."[36]

BLM should do the same in the EIS for the Eastern Colorado RMP and any other major decision document where oil and gas operations could have a significant impact on human health. Oil and gas development is acknowledged to have potentially severe impacts on human health, as noted below, and the Draft EIS should incorporate a formal methodology to evaluate all health issues and potential mitigations. We therefore request that the BLM incorporate a Health Impact Assessment (HIA), which is a systematic, comprehensive methodology for assessing human health impacts, as part of the EIS. A HIA looks at all the possible health effects from a decision, including contaminants and air pollutants but also water contamination, accidents and injuries, alcoholism and substance abuse, mental health impacts, and more.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Two papers authored by environmental health experts at the University of Colorado's School of Public Health examined available information regarding the health effects of oil and gas drilling and production. Among their findings is that: "Most of the hazardous chemicals associated with oil and gas production are well documented to produce adverse health effects in individuals." [39] Some of their conclusions that are specifically relevant to the Eastern Colorado RMP revision include:

-Air and water quality studies conducted to date indicate that potential exposures to hazardous emissions exist.

-Preliminary testing results indicate that ozone levels in some places are exceeding National Ambient Air Quality Standards and may be hazardous to humans.

-There are no plans for comprehensive and systematic monitoring of surface and subsurface waters.

-Environmental monitoring must be relevant to the areas where oil and gas development activity is occurring and the results must be readily available to the public. Unbiased interpretation of the results must occur in a timely manner and be made available to the public.

-It is important not to ignore what is already known. There is an immediate need for specific information on exposures and the impact from oil and gas development on all aspects of human health.

-An adequate monitoring program should be developed through a rigorous scientific process that addresses all currently recognized data gaps and health risks. This process should be developed in a transparent and explicitly unbiased way.

-A Health Impact Assessment (HIA) is a practical tool to evaluate future impacts, alternatives and appropriate strategies to promote and protect human health.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The hidden economic costs from oil and gas drilling are summarized in Table 1 and should be included as part of the economic analysis of the Eastern Colorado RMP. While many of these

costs are difficult to estimate, academic and federal agency economists have made great advances in developing methods to value non-market costs and benefits. Included in Table 1 are methods for estimating the economic costs, in order to make the point that these costs are quantifiable and should be included in the economic calculus. Many heretofore-unquantifiable wildland benefits and costs are now quantifiable, and are available to agency officials responsible for developing the policies and procedures for guiding public land management. We therefore strongly encourage the BLM to internalize non-market costs into the economic analysis of RMP alternatives in order to balance the multiple uses and benefits derived from public land.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

[Table 1 Economic Costs of Mining, Oil and Gas Extraction]

Cost Category: Direct Use

Description of Potential Cost: Decline in quality of recreation including hunting, fishing, hiking, biking, horseback riding.

Methods for Estimating Cost: Travel cost, contingent valuation surveys.

Cost Category: Community

Description of Potential Cost: Air, water and noise pollution negatively impacts quality of life for area residents with potential decline in the number of retirees and households with non-labor income, loss of educated workforce with negative impacts on non-recreation business. Decline in recreation visits and return visits negatively impact recreation businesses.

Methods for Estimating Cost: Surveys of residents and businesses. Averting expenditure methods for estimating costs of mitigating health and noise impacts. Change in recreation visitation, expenditures and business income. Documenting migration patterns.

Cost Category: Science

Description of Potential Cost: Oil and gas extraction in roadless areas reduces value of area for study of natural ecosystems and as an experimental control for adaptive ecosystem management.

Methods for Estimating Cost: Change in management costs, loss of information from natural studies foregone.

Cost Category: Off-site

Description of Potential Cost: Air, water and noise pollution affect quality of downstream and downwind recreation activities. Drilling rigs in viewsheds reduce quality of scenic landscapes, driving for pleasure and other recreation activities and negatively impacts adjacent property values. Groundwater discharged can negatively impacts adjacent habitat, property, and crop yields, while depleting aquifers and wells.

Methods for Estimating Cost: Contingent valuation surveys, hedonic pricing analysis of property values, preventive expenditures, well replacement costs, restoration and environmental mitigation costs, direct impact analysis of the change in crop yields and revenues.

Cost Category: Biodiversity

Description of Potential Cost: Air, water and noise pollution can negatively impact fish and wildlife species. Ground water discharged changes hydrological regimes with negative impacts on riparian areas and species. Road and drill site construction displaces and fragments wildlife habitat.

Methods for Estimating Cost: Replacement costs, restoration and environmental mitigation costs,

Cost Category: Ecosystem services

Description of Potential Cost: Discharging ground water negatively impacts aquifer recharge and wetland water filtration services. Road and drill site construction increase erosion causing a decline in watershed protection services.

Methods for Estimating Cost: Change in productivity, replacement costs, increased water treatment costs, preventive expenditures.

Cost Category: Passive use

Description of Potential Cost: Roads, drilling and pipelines in roadless areas results in the decline in passive use benefits for natural environments.

Methods for Estimating Cost: Contingent valuation surveys, opportunity costs of not utilizing future information on the health, safety and environmental impacts of oil and gas drilling.

Source: Testimony of Peter A. Morton, Ph.D., Resource Economist, Ecology and Economics Research Dept., The Wilderness Society, before the Subcommittee on Forests and Public Land Management, Committee on Energy and Natural Resources, United States Senate, April 26, 2001.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Costs: Pipelines

In order to bring gas to market, thousands of miles of pipeline must also be constructed – extending the impacts of gas drilling far from the actual drill site. The cumulative costs and environmental impacts associated with pipeline construction must be included in the BLM analysis because drilling wells and building pipelines are connected actions.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Cost: Ecological Footprint of Oil and Gas Exploration and Drilling

Oil and gas drilling operations leave behind a large footprint on the landscape – a footprint that extends well beyond the several-acre drilling sites. Beginning with exploratory activities, large trucks with seismic surveying equipment crisscross the landscape using a crude system of roads designed for lowering the financial costs of gathering geophysical information usually with little consideration for wetlands, fragile soils, storm water runoff or critical habitat. Exploratory drilling operations then require more large trucks with drill rigs using a network of constructed roads to access drill sites. If the exploratory well is determined to have no potential for production, the well is plugged, but the landscape scars remain. Depending on the agency with oversight, there is typically little enforcement or monitoring of environmental regulations. In addition, no surety bonds are required for restoration or clean up.

If the well has potential for production, the well is cased with pipe and cemented (in an attempt to prevent oil and gas from seeping into nearby aquifers), and the drilling rig is replaced by a well head. Electric or gas powered motors are used to power the pumps that collect the gas at each well and to power the series of compressor stations which run 24 hours a day to pressurize gas for pipeline transport from the wells to customers in distant markets. WORC 1999. Many drill sites also involve the construction of sediment ponds and retention reservoirs to collect storm

water drainage and store the ground water brought to the surface as a result of the drilling and extraction operation – the latter process is called dewatering.

Injection wells are sometimes used to dispose of the water produced and to enhance oil and gas recovery – an action that may necessitate additional drilling of a few to hundreds of injection wells throughout the field. Gauthier-Warinner 2000. The ecological footprint not only extends across the forest and range landscape, it also penetrates to shallow aquifers as well as aquifers thousands of feet below the earth's surface. The BLM must fully examine the costs of the environmental impacts from the footprint associated with oil and gas development.

Even though oil and gas infrastructure can occupy relatively small percentages of a larger landscape, its broad distribution can have negative impacts on an area more than 20 times the size of that occupied area. When oil and gas is developed, roads, pipeline corridors, well-heads, retention ponds, buildings, parking lots, and other components of the infrastructure pepper larger landscapes, coming within a quarter of a mile of as much as 97% of wildlife habitat. In addition to the direct effects (such as immediate landscape disturbance and habitat fragmentation), motorized routes also have negative impacts such as noise, dust, erosion, and human presence, that extend beyond the immediately disturbed area. Road densities as low as 1% or less of a given landscape can impact more than 99% of that landscape, leaving little undisturbed area in which wildlife can thrive. See Appendix C for documentation of research on the impacts of habitat fragmentation.

Additional costs are associated with the inability of agency enforcement staff to adequately inspect oil and gas wells and associated facilities for violations of applicable laws and to enforce requirements for protection and restoration of the area. A report by the Western Organization of Resource Councils (2005) found that:

-agency enforcement staff levels have not kept pace with the rapid expansion of oil and gas development;

-oil and gas wells and associated facilities are not inspected often enough;

-BLM environmental compliance inspectors spend too much time on other activities;

-agencies take too few enforcement actions; and

-citizen complaints are often ignored.

The resulting costs are evidenced in the impact on the ecosystem.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In considering the need and ways to manage these lands to protect the many resources of these public lands, the agency must consider the cumulative impacts from regional oil and gas development and the cumulative impacts to adjacent lands from oil and gas development. This analysis should inform the manner in which BLM allocates lands as available or unavailable for oil and gas development and the conditions under which development may be permitted.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Over the last decade, oil and gas development has shifted from vertical wells with dense well-pad spacing to directional and horizontal wells with horizontal well now takes the place of 8 to 16 vertical wells, leading to reductions in well pad disturbances, linear disturbances, and disturbances due to human activity (Oil & Gas Impacts on Wyoming's Sage-Grouse: Summarizing the Past & Predicting the Foreseeable Future, Human-Wildlife Interactions, David H. Applegate & Nicholas L. Owens, Fall 2014, 288) In 2012, the disturbance reduction resulting from this dramatic shift in drilling technology may have approached approximately 70 percent in Wyoming alone (Id. at 289).

After a well is drilled and completed, which usually takes just a few weeks to months, depending on how many wells are clustered on a pad, interim reclamation occurs and the surrounding land remains available for recreational and agricultural purposes. Once wells are plugged and abandoned and final reclamation occurs, the disturbance to the land is barely discernable, if at all.

Ultimately, the impacts of developing vital energy resources are temporary, and oil and natural gas development can and does coexist with other multiple uses. BLM should recognize these facts and not preclude an excessive amount of land from oil and natural

gas leasing.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

A number of geologists concur that the intrusive dikes associated with shale formations, such as those found in Huerfano County, "could serve as conduits for hydrocarbons activated by fracking in the producing formation" and that more studies would be needed to determine the possible rate and type of hydraulic conductivity that might occur should drilling proceed.[14. Email correspondence with CHC members and Professor Emeritus Robert Bea from the Department of Civil & Environmental Engineering, University of California Berkeley, and USGS scientists Kenneth Watts and Christopher Neuzil.]

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Commenter2:Kathy Mondragon

Commenter3:Mary Ann Flood

Commenter4:Margi Durrum

Comment Excerpt Text:

It has been totally jarring and upsetting to experience the first fracking well, which although it was located on the opposite side of the Huerfano Valley from where I live, still it impacted me greatly. For months the bright lights of the drilling site were of such intensity that the light created shadows deep within my house. Hwy 69, already an extremely dangerous road, was filled with large industrial trucks driving much too fast. And having read extensively about the harmful side effects of fracking, I know that our air was being polluted by the many cancer causing and endocrine disrupting chemicals that escape through all stages of the extraction process. The recent drilling for CO2 has also lit up the night skies and created great light pollution. Given the recent near-consensus of the world's scientific community that oil should remain in the ground if we are to survive, I urge, beg, plead that the Forest Service (BLM) firmly maintain its role as stewards of the public lands.

B.1.25.7. Fluid Minerals - Oil and Gas - Hydraulic Fracturing

Total Number of Comments: 43

Summary

Many commenters generally are concerned about the impacts of hydraulic fracturing (fracking) and expressed that they do not want hydraulic fracturing to be permitted under this RMP.

Commenters expressed concerns about the impacts of hydraulic fracturing on drinking water and other water resources, air, public health and communities, ecosystems' environmental health, recreational opportunities, tourism industries, wildlife and livestock, game species, climate change, and flooding's potential to spread chemicals associated with hydraulic fracturing operations.

Commenters noted the risks associated with hydraulic fracturing, such as the possibility of cement casing failures, water (aquifer, drinking water, surface and ground water, and private well) contamination, and underground spreading of contaminants. Commenters noted specific impacts from hydraulic fracturing, such as earthquakes, radon contamination in homes, surface disturbance, and chemical leaching. Commenters are concerned about the amount and source of water that hydraulic fracturing requires.

Commenters called for an impacts analysis of the range of chemicals used for hydraulic fracturing.

Commenter stated that allowing hydraulic fracturing gives an unfair advantage to one industry over others.

The BLM should analyze the likelihood that hydraulic fracturing will be used to develop the area's oil and gas.

The BLM should adequately protect public health and the environment by conducting more field inspections to enforce the hydraulic fracturing rule, employ the use of the Front Range Resource Advisory Council to advise number of inspectors needed and when the moratorium should be lifted, and air, water, and soil testing.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Sierra Club

Commenter1:Harv Teitelbaum

Comment Excerpt Text:

Modern oil and gas drilling techniques such as hydraulic fracturing ("fracking"), which have been banned in several countries, New York, public lands in Pennsylvania, and numerous communities, impose new and significantly greater impacts upon the land, water and wildlife resources, and the public at large. New, high volume fracking techniques pose new special risks beyond what was historically recognized, risks that must be addressed in any management plan

Organization1:Food and Water Watch

Comment Excerpt Text:

Fracking threatens Colorado's water, land, air, public health, recreational opportunities and tourism industries. Colorado's public lands should be preserved and protected for the enjoyment of the public not the exploitation of the oil and gas industry.

Organization1:Food and Water Watch

Comment Excerpt Text:

Spills, accidents, leaks, the disposal of toxic fracking waste and increased incidence of extreme weather events mean that the contamination of Colorado's water and land are inevitable. Fracking Colorado's public lands will also risk the quality of drinking water for millions of Coloradans a risk that is unnecessary, irresponsible and far too great.

Organization1:Food and Water Watch

Comment Excerpt Text:

The only way to ensure the use and enjoyment of Colorado's public lands for present and future generations is to reject fracking.

Commenter1:Fisher

Comment Excerpt Text:

I find it outrageous that as fracking is being increasingly put on hold or banned in numerous states and countries (France, Scotland, New York etc.) that the State of Colorado still finds it acceptable to not only continue but to actually expand the deployment of this technology, and the dangerous and unauthorised experiment on the health of its population, not just where land owners consent, but on public lands!

Commenter1:Ashley DeMio

Comment Excerpt Text:

Fracking has an immense, long-term affect on the health of not only our environment, but to the public as well. I BEG that you truly consider all negatives when deciding to implement fracking on our land. Please keep it minimal if it is necessary to be used at all (which it is NOT).

Organization1:Anadarko Petroleum Corp.

Commenter1:Nick Owens

Comment Excerpt Text:

Hydraulic Fracturing Technology

There is a reasonable likelihood that hydraulic fracturing technology will be employed in the area to access oil and gas minerals. The Forest Service must consider that there are no incidents of contamination from hydraulic fracturing on public or other lands, with over 1.2 million hydraulic fracturing operations conducted over the last sixty years.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Hydraulic fracturing requires millions of gallons (estimated five million gallons of water/well) of water for each well. The source of such water in large-scale production areas is a major concern. Will such water come from sources in Park County? Past proposals included buying private water rights and pumping water from rivers and reservoirs. Potential even exists for buying water from municipalities and towns including Fairplay. The cumulative impacts of such action could be significant for Park County and need to be defined in the MLP.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Chemicals used in fracturing are subject to public disclosure by rules of the Colorado Oil and Gas Conservation Commission. However certain "trade secret" exceptions limit full disclosure of certain chemical and materials. The MLP should address the range of chemicals and other materials that have potential to be injected into lands within Park County, along with worst-case options should these chemicals and materials contaminate shallow and deep level aquifers

Commenter1:Rhonda N Horwitz-Romano

Comment Excerpt Text:

As a citizen of the United States of America, I am opposed to BLM leasing of any public lands for fracking. We know that fracking poses grave threats to our environment and the health of our wildlife and people. Extensive reports from Foodland Water Watch, the EPA, Science Magazine, the National Academy of Science as well as state and local governments and citizens have made compelling arguments against fracking. Their studies and reports prove without doubt that fracking contaminates water, releases pollution and toxins into the air, leads to public health concerns, negatively impacts wildlife and leaves lasting scars on the environment. BLM is responsible for protecting our public lands and must NOT allow fracking and oil and gas industries to rape our land. I live in Gilpin County where negative impacts and scars of mineral extraction have destroyed the land forever. In parts of our County the water can never be used again. Have the forethought, based on factual evidence against fracking, to make the ethnical and correct decision to ban fracking on BLM lands. The health of our state, both current and future, depends on BLM saying NO to fracking.

Commenter1:Timothy J. Maine

Comment Excerpt Text:

the cement caseings between the steel pipes and outside the steel pipes does fail in older fracked wells on average for 30 % of fracked wells failure of the cement caseings happens within one week

Commenter1:Karl Ford

Comment Excerpt Text:

How will BLM ensure the aquifers will not be contaminated with fracking fluids or methane?

Commenter1:Karl Ford

Comment Excerpt Text:

According to paper in Environmental Health Perspectives, the available literature and case reports suggest that groundwater is infrequently contaminated by hydraulic fracturing itself, with the notable exception of gaseous methane. Groundwater contamination by liquid or solvent-based contaminants is documented from poor surface wastewater management or structural integrity of cemented wells (Shonkoff et al 2014). A 2008-2011 Colorado School of Public Health hydrological study found that as the number of gas wells in Garfield County increased, methane levels in water wells also rose (Thyne 2008). State regulators later fined EnCana Oil and Gas for faulty well casings that allowed methane to migrate into water supplies through natural faults

(Smith 2010, Harman 2011). Similar results of a study of 141 drinking water wells have been reported in the Proceedings of the National Academy of Sciences for the Marcellus Shale region in Pennsylvania (Jackson et al 2013).

3. Another study reported in the Proceedings of the National Academy of Sciences found that about 75% of wells sampled within 1 kilometer of gas drilling in the Marcellus shale in Pennsylvania were contaminated with methane from the deep shale formations (Osborn et al, 2011). Recently, it has been reported that there is a hotspot of atmospheric methane near the Four Corners area, which has been heavily developed for natural gas and petroleum (largely on BLM lands). There are residences on private wells near Bayfield that have methane emitting from their water taps. What assurances are there that similar results might happen for new fracking wells?

Commenter1:Karl Ford

Comment Excerpt Text:

Another study published in Environmental Science and Technology reported elevated levels of chloride and bromide, combined with the strontium, radium, oxygen, and hydrogen isotopic compositions of the wastewater effluents reflect the composition of Marcellus Shale produced waters (Warner, et al 2013). The discharge of the effluent from the treatment facility increased downstream concentrations of chloride and bromide above background levels. Barium and radium were substantially (>90%) reduced in the treated effluents compared to concentrations in Marcellus Shale produced waters. Nonetheless, 226Ra levels in stream sediments (544-8759 Bq/kg) at the point of discharge were ~200 times greater than upstream and background sediments. What is the disposition and treatment of fracking waters and how will BLM ensure proper treatment?

Commenter1:Karl Ford

Comment Excerpt Text:

An analysis by Environmental Working Group and The Endocrine Disruption Exchange (TEDX) found that at least 65 chemicals used by natural gas companies in Colorado are listed as hazardous under six major federal laws designed to protect Americans from toxic substances (Horwitz 2008) A more comprehensive list of chemicals used in natural gas operations from a public health perspective is published in the International Journal of Human and Ecological Risk Assessment (Colburn et al 2011). While the fracking rule requires after-the-fact disclosure of fracking constituents, how will BLM regulate (not just identify) the use of toxic chemicals in fracking fluids?

Commenter1:Karl Ford

Comment Excerpt Text:

In 2004, Canada-based Encana Corp. improperly cemented and hydraulically fractured a well in Garfield County, Colorado. The state found that the poor cementing caused natural gas and associated contaminants to travel underground more than 4,000 feet laterally. As a result, a creek became contaminated with dangerous levels of carcinogenic benzene. The state of Colorado fined Encana a then-record $371,200. After more than seven years of cleanup efforts, as of September 2012, three groundwater monitoring wells near the creek still showed unsafe levels of benzene (Horwitz 2011, Horwitz 2012). In 2008, a drilling wastewater pit in Colorado leaked 1.6 million

gallons of fluid, which migrated into the Colorado River (Lustgarten 2008). How will BLM ensure these incidents do not happen again?

Commenter1:Karl Ford

Comment Excerpt Text:

An exhaustive summary of hundreds of spills, groundwater and surface water contamination and enforcement actions by the Colorado Oil and Gas Commission is found in the paper, Fractured Communities (Michaels et al 2010) is a well-referenced summary of Colorado records for the period 2008-2010. During an eight-month period in 2011, companies in the state spilled 2 million gallons of fluids. Officials say there are up to 400 oil and gas spills each year in Colorado, but that only 20 percent contaminate groundwater (Williams 2013). How will BLM ensure these incidents do not happen?

Commenter1:Karl Ford

Comment Excerpt Text:

In March 2013 it was reported that an underground plume of toxic hydrocarbons from an oil spill north of the Colorado River near Parachute [Colorado] has been spreading for 10 days, threatening to contaminate spring runoff. Vacuum trucks have sucked up more than 60,000 gallons, but an unknown amount remains in the ground by Parachute Creek, which flows into the Colorado River (Denver Post 2013). The company responsible for the leak, Williams Energy, was put in charge of the clean-up (Upton 2013). The leak was caused by a faulty pressure gauge on a four-inch pipeline. Benzene levels in Parachute Creek rose above the safety threshold of 5 parts per billion. Following the spill, Colorado lawmakers discovered that state penalties for such accidents had been capped at $10,000 since the 1960s. In response, they passed legislation in May 2013 that increased possible state fines for such incidents. But the state had yet to fine Williams Energy (Upton 2013). Spills and intentional land application of hydraulic fracturing fluids have high potential to cause vegetation damage. Experimental land application of hydro-fracturing fluids meeting permit regulatory requirements in W. Virginia killed 56% of trees in the study area within 2 weeks (Adams 2011). How can BLM ensure these incidents will not happen again?

Commenter1:Karl Ford

Comment Excerpt Text:

During the massive floods in Colorado in September 2013, sites in northeastern Colorado that employed the use of hydraulic fracturing were flooded. It was reported that "These floods have not only overwhelmed roads and homes, but also the oil and gas infrastructure stationed in one of the most densely drilled areas in the U.S. Although oil companies have shut down much of their operations in Weld County due to flooding, nearby locals say an unknown amount of chemicals has leaked out and possibly contaminated waters, mixing hydraulic fracturing fluids and oil along with sewage, gasoline, and agricultural pesticides. No one, from oil companies to regulators, seems to know the exact extent of the damage yet as they survey the damage. But Executive Director of the Colorado Department of Natural Resources Mike King told the Denver Post that, 'The scale is unprecedented.' Meanwhile, the Colorado Department of Public Health has advised everyone to stay away from the water, as it is possibly contaminated by 'raw sewage, as well as potential releases from homes, businesses, and industry.' Two of the region's largest oil and gas companies, Encana and Anadarko, said they responded by shutting-in or closing down several hundred of

their wells, a precaution until they assess the full damage (Leber 2013). Shortly after flooding receded there were reports of two large spills and eight minor ones. Anadarko Petroleum reported the two larger releases in Weld County. About 125 barrels — or 5,250 gallons — spilled into the South Platte River near Milliken. A tank farm on the St. Vrain River released 323 barrels — or 13,500 gallons — near Platteville. The state oil and gas commission said it is trying to compile a comprehensive list of facilities in the flooded areas and their status, including what chemicals they had on site (Jaffe 2013, Ecowatch 2013). How will BLM ensure protection against flooding?

Commenter1:Karl Ford

Comment Excerpt Text:

Oil and gas industry sources emit at least 600 tons of contaminants in the state a day, as of 2013. They are the main source of volatile organic compounds in Colorado and the third-largest source of nitrogen oxides. A nine-county area around metro Denver does not meet federal clean-air standards, according to state data (Finley 2013). How can BLM permit large scale additional development in non-attainment areas such as the Front Range and Weld County, and how can it protect areas attaining air quality standards?

Commenter1:Karl Ford

Comment Excerpt Text:

A 2012 study published in Journal of the American Geophysical Union led by researchers at the National Oceanic and Atmospheric Administration (NOAA) and the University of Colorado, Boulder, estimated that natural-gas producers in an area known as the Denver-Julesburg Basin in Colorado are losing about 4% of their natural gas to the atmosphere — not including additional losses in the pipeline and distribution system. This is more than double the official inventory of methane leakage (Petron et al 2012). According to the state of Colorado, natural gas and oil operations were the largest source of ozone-forming pollution, VOC and third largest for NOx, (Clarke 2014); for Garfield County, oil and gas activities are the largest sources of VOC and NOx (Colorado Air Pollution Control Division, 2013). A 2013 Environmental Science and Technology study by scientists at the Cooperative Institute for Research in Environmental Sciences found that emissions from oil and natural gas operations account for 55% of the pollutants -- such as propane and butane -- that contribute to ozone formation in Erie, CO. How will BLM ensure air quality will not be degraded due to fracking?

Commenter1:Karl Ford

Comment Excerpt Text:

A 2014 paper published in New Solutions, reports environmental concerns surrounding drilling for gas are intense due to expansion of shale gas drilling operations. Controversy surrounding the impact of drilling on air and water quality has pitted industry and lease-holders against individuals and groups concerned with environmental protection and public health. Because animals often are exposed continually to air, soil, and groundwater and have more frequent reproductive cycles, animals can be used as sentinels to monitor impacts to human health. This study involved interviews with animal owners who live near gas drilling operations. The findings illustrate which aspects of the drilling process may lead to health problems and suggest modifications that would lessen but not eliminate impacts. Complete evidence regarding health impacts of gas drilling cannot be obtained due to incomplete testing and disclosure of chemicals, and nondisclosure

agreements. Without rigorous scientific studies, the gas drilling boom sweeping the world will remain an uncontrolled health experiment on an enormous scale (Bamberger and Oswald 2014). How will BLM protect livestock and wildlife from health effects of fracking?

Commenter1:Mary O'Brien

Comment Excerpt Text:

Whatever you do, please prevent these beautiful lands from being used by the oil and gas industry, and especially don't allow fracking! Nor development for housing or commercial building. Thank you.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

Water Quality and Quantity. Water quality and quantity are important factors for ecological health and sustenance. The NPS units and related areas rely on safe and persistent subsurface water supplies for drinking water, waste handling, and other operational needs. Among our concerns are the potential effects of geological fracturing, dewatering, fluctuations in surface- and groundwater levels and flows, and surface- and groundwater contamination.

Commenter1:Wendy Basham

Comment Excerpt Text:

The U.S. Department of Agriculture's U.S. Drought Monitor states that 46% of the U.S. is in drought which includes approximately half of Colorado, even after all the unusual rains this May. (From the week of July 21, 2015 http://droughtmonitor.unl.edu/MapsAndData/DataTables.aspx). One year ago, 73% of the U.S. was in drought.

There is no substitute for water. "Goldman Sachs estimates global water demand is doubling every 20 years and the United Nations expects demand to outstrip supply by more than 30% come 2040." (Newsweek, "The Race to Buy Up the World's Water" by Jeneem Interlandi, 10.8.10). Around the world, rivers, lakes and aquifers are dwindling faster than Mother Nature can possibly replenish them; industrial and household chemicals are rapidly polluting what's left.

"Almost every entity in Texas that sells water or manages water is trying to figure out how to get more; its like trying to squeeze blood from a turnip." says Norman Johns, Texas National Wildlife Federation resources scientist (National Wildlife, "A Tale of Two Cranes" Oct/Nov 2014). The New York State Department of Environmental Conservation reports that 2.4 to 7.8 million gallons of water are required when fracturing a single well. Eighty to three hundred tons of chemicals may be injected into the Earth to frack each well (one.gaslandthemovie.com).

US News reports that "39% of people living a halfmile from a gas well reported having upper respiratory problems like coughing, itchy eyes and nosebleeds." (http://www.usnews.com/news/articles/2014/09/10/respiratoryskinproblemssoarneargaswellsstudysays)

Issues surrounding hydraulic fracturing ("fracking") and injection wells are: increased level of earthquakes, increased radon in homes, increased birth defects, increased health hazards, and increased explosion risk of homes.

(http://stateimpact.npr.org/oklahoma/tag/earthquakes/http://www.resilience.org/stories/20150414/Frackingincreasesradongashazardusstudyfinds

WonYoung Kim, "Induced seismicity associated with Fluid injection into a deep well in Youngstown, Ohio," J. of

Geophysical Research:Solid Earth, Vol. 118, Issue 7, pages 35063518 (July 2014) DOI: 10.1002/jgrb.50247

Gibbs, James F.; Healy, John H.; Raleigh, C. Barry; Coakley, John M., "Earthquakes in the oil field at Rangely, Colorado," USGS OpenFile Report; 72130 (1972)

Ellsworth, W.L., "Injection-Induced Earthquakes," Science Vol. 341, No. 6142, p. 142 (2013).

DOI:10.1126/science.1225942. van der Elst, N.J.; Savage, H.M., Abers, G.A., and Keranen, K.M., "Enhanced Remote Earthquate Triggering at Fluid-Injection Sites in the Midwestern United States," Science Vol. 341, No. 6142, pp.164167 (2013) DOI:10.1126/science.1238948.

http://www.nbcnews.com/news/investigations/dangerbeneathfrackinggasoilpipesthreatenruralresidentsn187021

If you think hydraulic fracturing is safe here are a few good resources: Sierra Club video "Fracking 101" found at http://content.sierraclub.org/natural-gas/?utm_source=insider&utm_medium=email&utm_campaign=newsletterand the movies "Gasland" and "Gasland II". Also go to the following link for fracking facts: http://one.gaslandthemovie.com/whatsfracking#frackingprocess

Colorado does not have enough water in the first place, much less any water to pollute with fracking chemicals. Federal land is still the land of the people and we have the right to clean water for everyone. "According to a new report from The Wilderness Society and the Center for American Progress, coal, oil and gas leases on federal land comprise nearly a quarter of all energy related greenhouse gas emissions in the United States." (Earth Island Journal, p. 10 Summer 2015). "To fight global warming and protect this country's wild places, the Obama administration has to ban fracking on public lands," the Center for Biological Diversity said in a statement, (p. 10 Earth Island Journal, Summer 2015). Do not allow hydraulic fracturing in Colorado period! The risk is too grave!

Commenter1:Dariel Blackburn

Comment Excerpt Text:

I am the daughter of a geologist who was drilling for oil in the front range back in the '50s - '90s. The fracking they did then bears no resemblance to the high-pressure fracking done to today. Today's fracking is much more devastating to the environment, to our water and air.

Commenter1:Mary Ann Dimand

Comment Excerpt Text:

The US Geological Service has published its conclusion that fracking is implicated in increased seismic activity-- and inexplicably seems to be ignored by other branches of our government. Please make use of the findings of your sister service in pursuit of your mission of preserving our environment for public health and use.

Commenter1:John Chavis

Comment Excerpt Text:

Please do not allow domestic and foreign corporations contaminate our soil and water, an outcome which goes hand-in-hand with fracking. There is no clean way to frack. The industry averages an immediate well failure rate of 4-8% and accepts this as part of doing business. Please do the right thing for the people of Colorado and for future generations, please reject fracking.

Commenter1:Andrew Wright

Comment Excerpt Text:

FRACKING HAS ALREADY BEEN PROVEN TO POLLUTE LARGE AREAS OF LAND AND WATER, CAUSE EARTHQUAKES, AND DESTROY ECOSYSTEMS.

Commenter1:Elizabeth Wittington-Chamber

Comment Excerpt Text:

Do not open OUR public lands to fracking. I followed around the Colorado Oil and Gas Task Force, I listened to the many environmental and public health doctors and scientists report the disturbing findings about worsened air, water and quality of life. The smooth talking oil companies give grand orations about jobs, about how they are "environmentalists" but scoff at mere idea that Fracking may not be safe... I can go on. But I simply will say: DO NOT FRACK OUR LAND.

Commenter1:Lindsay Cohen

Comment Excerpt Text:

I would also like proof/evidence as well showing unbiased, controlled and documented studies that the integrity of the land will not be compromised due to fracking if you choose go through with fracking in these public areas.

Commenter1:R. Burghilde

Comment Excerpt Text:

-One course of action would be to hold off the oil and gas development until an objective investigation can certify that it is safe. (All the current work groups on the subject were anything than objective but heavily staffed and run by the oil industry and, here in Colorado, a governor who will do their bidding under any and all circumstances).

-If the BLM is obligated to allow fracking - and I doubt that this is the case, since it would give an unfair advantage to one industry over all others - the plans could be changed to at least not allow fracking in a location where almost half of Denver's drinking water is endangered.

-And, of course, the area slated for oil and gas development could be opened up to renewable energy development instead.

Commenter1:Tina Burns

Comment Excerpt Text:

Oklahoma should be a prevalent indicator on the impacts of fracking.

Commenter1:Maridith Dressler

Comment Excerpt Text:

Over the recent years that hydraulic fracturing has been an acceptable practice on BLM public lands animals have suffered from immense disruption of their habitat and contamination. Hunters are noticing a decrease of game as well as noticeable drop in the quality of the game available. Many people hunt to obtain meat that is not tainted and that is much healthier than meat that's available on the open market. Fracking has contaminated many water sources, and has created open produced water “fracking ponds” that are available to wildlife to drink out of. Wild game has been reduced in number as well as becoming sick or contaminated from these water sources. The available grazing surrounding these contaminated water sources are also contaminated. When wildlife eats this available grazing they become contaminated. The trucks traveling through the BLM properties are loud and create a huge amount of dust. The produced water trucks are from the industry and they are dumping contaminated water creating contaminated dust on roads of the BLM properties. BLM land should be used as a wildlife refuge and not wildlife destruction.

These are pictures of the gas well hydraulic fracturing industry conducted in the northern Raton Mesa on or near BLM lands These water trucks are dumping produced contaminated water directly on the roads for “dust mitigation”. With more than 500 pads in the area hundreds of trucks traveling up and down the roads every day spreading contaminated dust far and wide. The dust is horrendous year round and it is filled with contamination. This causes respiratory illness in animals and humans. The large number of trucks and other industrial rigs are constantly disrupting wildlife habitat. Many of the trees bushes and grasses in these areas are dying or dead. Often they're removed to cover up the fact that surface spills and contamination are very common. Thousands of tons of salt have been dumped into the surface water destroying ancient perennial wetlands and native plant life. Ground water draw down has drastically reduced the spring water available to wildlife. This forces them to drink the only available water, contaminated water. The spills are never cleaned up the industry simply covers them over. The air is polluted by constantly running drills, pumps, and trucks, also by leaking methane from the wells themselves. There is heavy erosion created by all this industrial activity. Noxious weeds have become a much worse problem in the areas that have been disrupted by the hydraulic fracturing industry.

Organization1:MoveOnOrg

Commenter1:Sarah Alexander

Comment Excerpt Text:

"I urge the Bureau of Land Management to oppose fracking on Colorado's public lands as part of the new Eastern Colorado Resource Management Plan.

Fracking threatens Colorado's water, land, air, public health, recreational opportunities and touris industries.

Commenter1:Brenda Sanders

Comment Excerpt Text:

Please do not allow hydraulic fracturing to occur on Colorado's public lands as part of the Eastern Colorado Resource Management Plan.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

6. Impacts Specific to Fracking and Multi-Well Pads

Modern oil and gas drilling techniques create significantly greater impacts which must be taken into account in determining which portions of the Eastern Colorado resource management area are suitable for oil and gas development. These include:

- Traffic. Fracking requires hundreds or thousands of truck trips per well to deliver fracking fluids and remove liquid waste from the site.
- Duration of impacts. Fracking, particularly where multiple wells are drilled from a single pad location, occupies a site for months rather than weeks. While directional drilling may reduce the number of drill sites, it increases the duration of occupancy on the sites where drilling takes place.
- Practice of “re-fracking” horizontal wells. Production from “tight” oil-bearing formations declines quickly, requiring that wells be “re-fracked” to maintain production. This means that the impacts of the drilling phase are likely to continue over the life-time of the well.

These impacts are of such a magnitude and are so pervasive that they are properly considered in developing the resource management plan, rather than at the individual well permtting stage

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

We note that in past analyses of oil and gas activities, the BLM has assumed that there would be substantially greater surface disturbance during the initial drilling operations and placement of infrastructure, with an initially disturbed area calculated to be more than double the area of long-term disturbance. See http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/planning/rmps/pinedale/deis/appendices.Par.50674.File.dat/Appendix10.pdf (setting guidelines for determining surface disturbance for the Pinedale Anticline in Wyoming; also assuming that access road width would be 40 feet during the development phase, narrowing to 23.5 feet long term). The BLM should consider whether the practice of re-fracking and the need to manage hydraulically fractured wells more intensively means that long-term disturbance will affect a much greater acreage than was the case with conventional drilling practices.

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

The State of New York recently imposed a ban on fracking, despite the economic benefits of oil and gas development, based on its analysis of the adverse impacts of the practice. The BLM should very carefully consider the studies and analysis which the state conducted in reaching this decision.

http://www.dec.ny.gov/energy/75370.html. This action was based on a large number of studies documenting the risks associated with the practice. See http://concernedhealthny.org/wpcontent/uploads/2014/07/CHPNYFrackingCompendium.pdf (presenting a compendium relevant studies).

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must take into account the likely effects of hydraulic fracturing, including specifically current technology, in terms of both the amount of development and the potential environmental effects in the Eastern Colorado RMP/EIS or else a new EIS will be required before leasing.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

Dikes as Potential Conduit for Fluids

Although hydraulic fracturing was indeed invented in the late 1940's, and oil and gas drilling has existed in the Spanish Peaks region for longer than that, the act of horizontally hydraulically fracturing among or through igneous dikes is a fairly new. Given the prevalence of dikes in our region, and recent increases in oil and gas activity, Huerfano and Las Animas counties are unfortunately testing grounds for this concept. The issue deserves scientific scrutiny and consideration, and we must consider the question of whether it is safe.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

The problem with fracking in the Spanish Peaks region is that the model of the uniform shale "frack barrier" may frequently not apply.

Organization1:Citizens for Huerfano County

Commenter1:Keli Kringel

Comment Excerpt Text:

As the BLM is able to prioritize usage of our public land at a landscape scale, and are looking towards the future and listening to the voices they are hearing from Huerfano County, I ask that they protect the ground water resources existing under public lands by making oil and gas drilling and fracking off limits in theareas where the dikes exist.

I have considered how this could be done and can recommend the following specific changes to the landscape or management actions:

1. The BLM could define a geographic layer for "dikes of the Spanish Peaks" areas based on any method practical.

1.1 One suggestion might be all points within m miles of any dike shown on the R.B. Johnson Trinidad Quadrangle map [3. Johnson, R.B., 1969, Geologic map of the Trinidad quadrangle, south-central Colorado: U. S. Geological Survey Miscellaneous Geologic Investigations Series Map I-558, scale 1:250,000]. The specific distance (m miles) would be determined based on a geologist's recommendation.

1.1.1 "m" should be based on a geologist's recommendation, but at least 2 miles away to account for the length of horizontal well borescoming into the area and at least a bit of buffer knowing surface and deep dike locations are not necessarily the same.

1.1.2 Surface dikes and deep dikes below them may not always lie on exactly the same trajectory, but should be some commonalities like direction and presence in a general area that make this a reasonable thing to do at the landscape level. After all, agency rule making requires the process of generalizing based on common sense and what is known now (e.g. establishing setbacks)

1.1.3 Using a surface map may not identify all areas with dikes (as some "swarms" or individual dikes may not be exposed at the surface) but at least it will cover areas we do know about.

1.1.4 This method is far from perfect, but a perfect method is not available and this is better than opening dike-dense areas to drilling and fracking.

1.1.5 The R.B. Johnson map may seem low tech but it better predicted subsurface dike locations than the seismic data collected by SWEPI.

1.1.6 The suggested layer could be based on R.B. Johnson's map, but updated as more is learned about the location and properties of surface and subsurface dikes and the areas adjacent to them.

1.2 A landscape level change is needed because on an individual well basis, avoiding hitting dikes and the fractured areas near them with hydraulic fractures is unmanageable unless you can map the subsurface dikes

1.2.1 The COGCC does not require avoidance of dikes, collection of seismic to map subsurface dikes, nor examine seismic that has been collected to see if it indeed shows dikes.

1.2.2 Operators left on their own may or may not opt to collect seismic data, or their seismic may or may not show dikes or characterize fractures around dikes. (SWEPI example)

2. On mineral land that is currently unleased (or becomes unleased when a lease expires), where it overlaps with said geographic layer for the "dikes of the Spanish Peaks" areas, the BLM could make it closed to leasing as it is too much of a threat to groundwater to frack amongst the dikes of the Spanish Peaks.

3. On mineral land that is already leased, I understand from the Fluid Minerals ECRMP flyer background section that "Decisions to prohibit or restrict fluid mineral activities through closures and lease stipulations in this RMP will not affect existing leases." Hence, I will not try to create stipulations, such as NSO or closures upon the already leased lands, however:

3.1 In the new 2015 BLM hydraulic fracturing rules, which do apply on currently lease land for all new APDs, there is:

"Section 3162.3–3(d)(2) is revised in the final rule to require the operator to submit a map showing any faults or fracture within one-half mile of the wellbore trajectory that may transect the confining zone. This will allow the BLM to identify and analyze during the permit review process any potential for hydraulic fracturing fluid to migrate outside of the zone being fractured."

Dikes should be included along with "faults and fractures" in the above as they can act just like them in their transmission of fluids and the areas adjacent to them are often highly fractured. (Consider the area on either side of a dike AT LEAST as wide as the dike itself like a fracture as well.) If this cannot be generally part of this rule, then it could at least be applied to existing wells within the "dikes of the Spanish Peaks" layer.

3.2 Per Dr. Heloise Lynn suggestion (p.12) "require the documentation of the structure and lithology of adjacent rocks, in-situ stress, and natural fractures around the dike intrusions that lie on BLM land, prior to allowing any drilling within 1000 meters (3280 ft.) of dikes that extend to the surface, or dikes that are buried at depth." (BLM could change 1000m to ½ mile for consistency with their rules if it is a loteasier to manage that way.)

B.1.25.8. Fluid Minerals - Oil and Gas - Mitigation Measures

Total Number of Comments: 6

Summary

Commenters called for mitigation measures, including reclamation, inspections, and BMPs. The BLM should employ technicians to inspect well operations, particularly air and water quality monitoring. The BLM should require operators to follow the reclamation actions to minimize impacts on wildlife that are recommended by Colorado Parks and Wildlife, Colorado Oil and Gas Conservation Commission 1000 Series Reclamation regulations, and 43 CFR 3160. One commenter outlined requirements that reclamation plans could include, including baseline documentation, weed management, and long-term maintenance plans for infrastructure. Commenters suggested implementing Colorado Parks and Wildlife BMPs (2012).

The BLM should address how public health will be protected.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Sierra Club

Commenter1:Harv Teitelbaum

Comment Excerpt Text:

As threats and risks from oil and gas operations are increasingly measured and confirmed by the scientific and academic communities, greater restrictions on oil and gas development than may be imposed by a particular state or state agencies are more than appropriate and necessary to protect the environment, communities, and surface landowners. The BLM has the principle responsibility for managing its lands and interests to achieve its multiple objectives independent of state or commercial influences.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Reclamation

BLM should require operators to follow the reclamation-related actions to minimize adverse impacts to wildlife that are recommended by Colorado Parks and Wildlife (CPW 2012).

Operators must also follow COGCC 1000 Series Reclamation regulations on interim and final reclamation at: https://cogcc.state.co.us/RR_Docs_new/rules/1000Series.pdf

BLM regulations established in 43 CFR §3160 (i.e., Onshore Oil and Gas Order No. 1) require that a reclamation plan be submitted with the Surface Use Plan in the Application for Permit to Drill (APD). These plans require that surface reclamation must be designed to return the disturbed area(s) to productive use and meet the objectives of the land and resource management plan.

Reclamation plans should address surface reclamation and/or stabilization of all disturbed areas for both the interim reclamation of all areas not needed for production and final reclamation of locations (after plugging) or linear facilities (upon completion of construction). Such plans must include the reclamation timelines, configuration of the reshaped topography, drainage systems, segregation of spoil materials (stockpiles), storage, and redistribution of topsoil, soil treatments, seeding or other steps to stabilize soils and reestablish vegetation, and weed control. The reclamation plan should be updated and resubmitted for approval if any changes occur that may influence reclamation.

Plan components should include at a minimum:

1) Documentation of surface and site conditions prior to disturbance:

2) Construction practices and interim reclamation design

3) Weed management

4) Monitoring methods

5) Interim reclamation plan (including timelines, success criteria and requirements)

6) Final reclamation plan (including timelines, success criteria and requirements)

7) Long term maintenance plans for roads, pipelines, power lines and facilities

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

Details of compensatory mitigation for minerals development impacts that cannot be avoided or minimized.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

The EIS must include specific mitigation measures and alternatives based on a cumulative impacts assessment, and the particular vulnerabilities of environmental justice communities in both urban and rural settings.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Elk – Enhanced BMPs

The two proposed BLM tracts total 5,090 acres. These BLM parcels are located to the east and west of Park County Road 53 in the southernmost portion of the proposed MLP boundary. These areas are elk winter concentration areas and production areas. We recommend required adherence to Colorado Parks and Wildlife BMPs (2012) Actions to Minimize Adverse Impacts to Wildlife Resources, Section G, October 27, 2008 (Updated March 16, 2013). The purpose is to avoid or minimize surface disturbance within these areas of elk winter concentration and production areas.

Organization1:Colorado Wildlife Federation

Commenter1:Suzanne O'Neill

Organization2:National Wildlife Federation

Commenter2:Kathleen Zimmerman

Comment Excerpt Text:

Pronghorn and Deer - Enhanced BMPs

These 52,156 BLM subsurface acres within the proposed MLP boundary generally lie to the south of Spinney and Eleven Mile Reservoirs and extend to the east and west of Highway 9 and south of Hartsel. These areas are pronghorn winter concentration areas and deer severe winter range and winter concentration areas. We recommend required adherence to Colorado Parks and Wildlife BMPs (2012) to avoid or minimize surface disturbance within pronghorn winter concentration areas and these areas of deer severe winter range.

B.1.26. Coal

B.1.26.1. Coal - Impacts

Total Number of Comments: 3

Summary

Commenters provided several impacts that would be expected from coal mining that BLM should consider in the EIS. These include:

- slurry disposal and hazardous wastes
- coal dust emissions causing respiratory, cardiovascular, and cerebrovascular health concerns
- coal ash waste and greenhouse gas emissions from burning coal
- waste earth and rock from mining activities
- safety hazards from mine collapse and ground sinking
- destruction of landscapes, soils, forests, and wildlife habitats, as well as dust and noise pollution from strip mining

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

coal extraction results in serious indirect impacts:

--Coal processing produces a liquid waste known as slurry, which must be disposed underground or in impoundments. This sludge is liable to leak or spill and contaminate aquifers or streams.

--Coal transport via trucks or rail results in coal dust escaping train cars and being distributed over wide areas, including in streams. Coal transport also results in the combustion of diesel fuel (with attendant air pollution) to move the coal.

--The combustion of coal not only results in greenhouse gas emissions, but other harmful air pollution including sulfur dioxide, nitrogen oxides, particulate matter, and heavy metals. These emissions lead to smog, acid rain, and numerous respiratory, cardiovascular, and cerebrovascular effects. In addition, coal combustion can lead to mercury emissions that can harm fish and other aquatic species.

--Coal combustion also leads to enormous amounts of coal ash waste, which is disposed in landfills or surface impoundments. Precipitation filtering through these waste pits can cause toxic substances to leach out into the environment. These impoundments can also fail, causing many tons of hazardous wastes to release and contaminate nearby communities.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Underground mining causes the following harms:

--Underground mining causes huge amounts of waste earth and rock to be brought to the surface – waste that often becomes toxic when it comes into contact with air and water.

--It causes subsidence as mines collapse and the land above it starts to sink. This causes serious damage to buildings.

--It lowers the water table, changing the flow of groundwater and streams.

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

Strip mining causes the following:

--Strip mining destroys landscapes, forests and wildlife habitats at the site of the mine when trees, plants, and topsoil are cleared from the mining area. This in turn leads to soil erosion and destruction of agricultural land.

--When rain washes the loosened top soil into streams, sediments pollute waterways. This can hurt fish and smother plant life downstream, and cause disfiguration of river channels and streams, which leads to flooding.

--There is an increased risk of chemical contamination of ground water when minerals in upturned earth seep into the water table, and watersheds are destroyed when disfigured land loses the water it once held.

--Strip mining causes dust and noise pollution when top soil is disrupted with heavy machinery and coal dust is created in mines

B.1.27. Locatable Minerals

B.1.27.1. Locatable Minerals - Alternatives

Total Number of Comments: 14

Summary

The BLM should consider a variety of management alternatives in order to protect surface water and groundwater resources in the planning area, particularly those used for drinking water, from mining-related contamination. These alternatives include the use of mineral exchanges, administrative mineral withdrawals, no surface occupancy setbacks, and the restriction of in-situ uranium mining. In regards to setbacks, the distance should be determined by a calculation of groundwater velocity with a 1,000-foot minimum. For reservoirs and fens, a one-half mile setback is proposed. Additionally, a 1,000-foot setback is also recommend from residential areas for any mining activities other than placer mining. Areas recommended for withdrawal include:

- perennial riparian areas (it is recommended that this be defined as the 100-year floodplain)
- big game birthing habitat
- fishery habitat
- special status plant and animal habitat
- ACECs and WSAs
- potential National Register of Historic Places sites
- developed recreation sites
- the Arkansas River corridor from Leadville to Pueblo Reservoir
- the Gold Medal fishery on the Middle South Platte River
- Spinney Mountain Reservoir

Additionally, water resource monitoring plans should be required for any mining activity that could impact water quality. Such monitoring plans should include surface water and groundwater and occur before, during, and after any project. The BLM should continue to recognize alluvial prospecting as a legitimate activity, particularly in Cache Creek.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

For uranium mining, a setback from selected water bodies (including all reservoirs) in order to prevent the migration of mining-related contamination into the drinking water supply for 1.5 million people. The distance from the water bodies would be determined by calculation of ground water velocity, but a minimum of 1,000 feet is proposed.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

A 1000-foot setback from residential subdivisions and residential zones for any mining (other than placer mining) or large-scale renewable energy projects, in order to reduce conflicts in land use and protect residents' health

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County wishes to prevent migration of mining-related uranium into surface water or groundwater within the County, in order to protect the vulnerable drinking water supply for Park County residents and 1.5 million Denver Metro residents. Park County would like to work with BLM to explore how to put protections in place in the RMP through various means, such as a minerals exchange, mineral withdrawal, No Leasing of uranium, and No Surface Occupancy setbacks from water bodies. Specifically, Park County would like to restrict in-situ uranium mining within the County and also restrict uranium processing, tailings and waste disposal on BLM lands to protect our important water resources, air quality, and public health.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

For uranium mining, the County requests No Leasing within the vulnerable drinking water aquifers in South Park. The aquifers include those identified by the U. S. Geological Survey and Colorado Geologic Survey in the "South Park Groundwater Scoping Study" referencedat the end of this document. Page 16 of this report states: "Structurally, the basin is quite complex being dominated by the Laramide Sawatch uplift on the west and Front Range uplift on the east. Internally, the basin contains faulting and folding attributed by many to Late Cretaceous to Eocene Laramide deformation (Stark, and others, 1949; De Voto, 1971;Chapin and Cather, 1983; and Scarbrough, 2001). Deformation styles attributed to the Laramide event include

thrust faulting, folding, and possible strike-slip faulting with widespread zones of deformation affecting most of the basin."

-These aquifers serve as drinking water to residents of the County and extend to a depth of approximately 1,000 feet. The complex geology presents the opportunity for uranium to be present in most of the aquifers in South Park. A detailed analysis is needed before leasing decisions are made. In-situ uranium mining should be restricted due to the complex geology of these aquifers and the potential for unintended migration of uranium or other radionuclides.

-For uranium mining, a setback from selected water bodies (including all reservoirs) in order to prevent the migration of mining-related contamination into the drinking water supply for 1.5 million people. The distance from the water bodies would be determined by calculation of ground water velocity, but a minimum of 1,000 feet is proposed.

-A 1000-foot setback from residential subdivisions and residential zones for any mining (other than placer mining) or large-scale renewable energy projects, in order to reduce conflicts in land use and protect residents' health.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The current Eastern Colorado AMS would change the previous RMP planning decision that Perennial Riparian areas were closed to locatable mineral entry, except for recreational placering, and closed to mineral materials disposal. The new planning decision focuses instead on rehabilitation and reclamation requirements and discretionary case-by-case review. Park County prefers the 1996 RMP approach. If the difficulty for BLM is in defining "perennial riparian area," then the County offers to help define these areas. One approach may be to use the 100-year floodplain.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The AMS proposal below seems to rely on reclamation after damage is done. Bonding may be inadequate to complete reclamation from a mining project.

AMS Options for Change: "There are provisions within 43 CFR 3809 to not allow for unnecessary undue degradation. In addition, if the operator proposed to impact fisheries and/or wildlife habitat, there is a requirement to rehabilitate fisheries and wildlife habitat during reclamation. As these practices would be incorporated into the reclamation, the reclamation bond collected prior to the activities being initiated would have to account for this rehabilitation effort.

Areas to be closed to locatable mineral entry should be judicially selected, as 43 CFR 3809 regulations already account for management of this resource.

If the intention is to also close these areas to mineral material disposal, the term "perennial riparian area" needs to be better defined and much more specific. Otherwise, this call could be

made on a case-by-case basis when a mineral material application is received in a questionable area, as these decisions are discretionary."

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

In addition, the existing RMP allows for mineral withdrawals for selected areas, while the AMS document does not withdraw these areas (see below). The County supports the existing RMP decision, which does not rely on case-by-case discretion of the Field Office. The County would like to see the protections below maintained:

Current 1996 RMP: New withdrawals (i.e., areas that will be closed to mineral entry and mineral material development) will be issued in order to protect the following (which apply in varying combinations to all subunits):

- Perennial riparian areas

- Big game birthing habitat

- Fishery habitat

- Special status plant habitat

- Special status animal habitat

- Portions of ACECs

- Potential NRHP sites

- VRM Class II within ACECs

- Developed recreation sites

- Arkansas River corridor (from Leadville to Pueblo Reservoir)

- WSAs

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County asks BLM to consider recommending minerals withdrawal for lands adjacent to selected water bodies in Park County. The goal is to prevent the migration of mining-related contamination into the drinking water supply for 1.5 million people. The County recommends withdrawal:

- For the Gold Medal Fishery on the Middle South Platte and Spinney Mountain Reservoir, a ½-mile withdrawal

- To protect fens and reservoirs. The distance would be determined by calculation of ground water velocity, but a minimum of 1,000 feet is proposed for fens and reservoirs.
- Withdrawal of land within proposed ACECs.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

For uranium mining, the County requests No Leasing within the vulnerable drinking water aquifers in South Park. The aquifers include those identified by the U. S. Geological Survey and Colorado Geologic Survey in the "South Park Groundwater Scoping Study" referenced at the end of this document. These aquifers serve as drinking water to residents of the County and extend to a depth of approximately 1,000 feet. The complex geology presents the opportunity for uranium to be present in most of the aquifers in South Park. A detailed analysis is needed before leasing decisions are made. In-situ uranium mining should be restricted due to the complex geology of these aquifers and the potential for unintended migration of uranium or other radionuclides.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

In order to prevent the migration of mining-related contamination into critical drinking water supplies, we recommend minerals withdrawal, including uranium mining, for lands adjacent to selected water bodies (including reservoirs) across the RMP planning area. Furthermore, future projects such as uranium mining, that could impact water, should be required to include a water resource monitoring plan for surface water and ground water (water levels and water quality, before, during and after any project). This should include baseline and long-term monitoringfor private wells.

Organization1:Denver Water

Commenter1:Paula Daukas

Comment Excerpt Text:

Preventing migration of mining-related waste, including uranium, into surface water or groundwater across the RMP planning area is important for protecting vulnerable drinking water supplies.

Organization1:GPAA/Public Lands for the People

Commenter1:Garry Vaughn

Comment Excerpt Text:

Mining- Leave areas claimed open

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

Preventing migration of mining-related waste, including uranium, into surface water or groundwater across the RMP planning area is important for protecting vulnerable drinking water supplies. We offer to work with BLM to explore options for ensuring that the RMP includes adequate protections for surface and groundwater from mining (e.g., minerals exchange, mineral withdrawal, no leasing of uranium, and NSO setbacks from water bodies). In order to prevent the migration of mining-related contamination into critical drinking water supplies, we recommend minerals withdrawal, including uranium mining, for lands adjacent to selected water bodies (including reservoirs) across the RMP planning area.

Organization1:Denver Water

Commenter1:Jason Marks

Comment Excerpt Text:

future projects such as uranium mining, that could impact water, should be required to include a water resource monitoring plan for surface water and ground water (water levels and water quality, before, during and after any project). This should include baseline and long-term monitoring for private wells.

B.1.28. Mineral Materials

B.1.28.1. Mineral Materials - Baseline Affected Environment

Total Number of Comments: 1

Summary

Commenters noted the history of agriculture and mineral exploration in the planning area.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Commenter1:Michael Smilie

Comment Excerpt Text:

I strongly support continuation of a mixed use approach to the area that preserves its agricultural and mineral exploration roots

B.1.28.2. Mineral Materials - Impacts

Total Number of Comments: 2

Summary

Commenters noted the impact that mining-related activities can have on the preservation of undeveloped landscapes.

See Section 2.3.1.19, Minerals and Energy Development, including Fluid Minerals, Coal, Locatable Minerals, and Mineral Materials (p. 27)

Commenter1:Andrew Sellman

Comment Excerpt Text:

I spent most of my years growing up in the upper and lower Western States (Montana, Utah,Texas, New Mexico) and spent a lot of time in Colorado. Magnificent wild places back then, hard to get to, so they were largely unspoiled by humanity. I value the wild, natural, and outstanding public lands that still exist in the Eastern Colorado area because the BLM has kept these areas from by exploited by industry. I've seen the results (and resulting environmental disasters) in Montana, which the state has been unable to recover from all those years of mining, overuse of underwater acquifiers (resulting in salt buildup in huge areas of the state. These undeveloped landscapes in Colorado, ranging from grassland prairies to alpine meadows, represent an important piece of Colorado's natural heritage and economy. BLM should protect our remaining wild lands so they, under BLM close supervision, can be maintained as close as possible to pristine. Land Management is probably a incomplete definition of your job: to Preserve land for future generations, unspoiled by overuse by humanity.

Commenter1:Jim Wells

Comment Excerpt Text:

My land cannot be returned to its natural robustness nor beauty some, maybe, but mining impacts are essentially forever. And Eastern Colorado has had plenty of mining impacts. So, I value the remaining wild, natural, and outstanding public lands in the Eastern Colorado area. These undeveloped landscapes, ranging from grassland prairies to alpine meadows, represent an important piece of Colorado's natural heritage and, if I am not mistaken, bring Colorado dollars from far away. The BLM should protect our remaining wild lands that offer real and monetary values

B.1.29. Areas of Critical Environmental Concern

B.1.29.1. Areas of Critical Environmental Concern - Alternatives

Total Number of Comments: 10

Summary

The BLM should commit to the use of ACECs to protect sensitive areas, and that for lands not qualified for wilderness, ACEC status should be considered and recommended. Additional recommendations were made for management in buffer areas around ACECs to limit impacts on the ACECs.

In addition, continued protection and/or expansion of existing ACECs was recommended for Beaver Creek, Cucharas Canyon, Garden Park, and Mosquito Pass ACECs.

See Section 2.3.1.20, Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers (p. 28)

Commenter1:Lilly Zoller

Comment Excerpt Text:

As a Coloradan who values outdoor recreation and protection, I would like to see continued preservation of the two BLM designated Areas of Environmental Concern that are partially contained within this unit. Garden Park Fossil Area and Phantom Canyon.

Commenter1:George Alderson

Comment Excerpt Text:

For lands not qualified for wilderness, ACEC status should be considered and recommended in the draft RMP

Organization1:Pew Charitable Trusts

Commenter1:Ken Rait

Comment Excerpt Text:

Recommendation: BLM should commit to the use of ACECs as a management tool in the Eastern Colorado RMP, and require each ACEC designation to include specific management prescriptions to protect values for which the ACEC is designated.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

There are currently nine ACEC designations in the Royal Gorge planning area; none in the Northeast planning area (see Maps C, Special designations in northern half of Royal Gorge BLM planning area, and D, Southern end of Royal Gorge BLM planning area with special designations. See See comment letter for maps.). Five ACECs (Browns Canyon, Mosquito Pass, Grape Creek, Cucharas Canyon, and Arkansas Canyonlands) have been identified as being managed to protect and enhance their special riparian, fishery, and wildlife values (ROD 1996). We believe these five ACECs, and in particular the Arkansas Canyonlands ACEC, should continue to be protected and suggest a few increased protection measures.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

In addition, we request that the BLM consider imposing stronger stipulations in the Grape Creek ACEC that place a half-mile buffer of NSO for fluid mineral leasing along the river and streams within these areas.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Browns Canyon ACEC should include additional protection measures. We understand that Browns Canyon National Monument will be going through its individual resource plan, but the adjacent BLM lands not included in the Monument designation should include the NSO buffer (see Map B).

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County agrees with keeping these 1996 RMP decisions in the Eastern Colorado RMP:

- Mineral materials development will not occur in ACECs.
- NSO for fluid minerals in Mosquito Pass ACEC.
- VRM Class II areas within ACECs will be avoided for major rights-of-way.
- Timber harvesting and wood gathering will be allowed only for enhancement of protected values.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

[Stanley Creek LWC, Badito Cone LWC, and The Cucharas Canyon ACEC] These two LWC's and the 1 ACEC should be closed to military training activities, including landings associated with High Altitude Mountain Environment Training. We saw the negative effects of a Military Operations Area (MOA) in Huerfano County many years ago.The air traffic at the time was very disturbing, and especially dismaying when one was out in the natural world hiking, camping, fishing, enjoying the peace and quiet that they should offer. There seems to be a big uptick in some kind of training flights going on in the Huerfano Valley right now, and it is very disturbing to experience. No MOA's should be allowed over BLM lands.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should commit to landscape-level conservation, and implement Planning 2.0 strategies into ACEC designations in the Eastern Colorado RMP. Upon release of the updated ACEC Manual, BLM should adhere to the guidance put forth in the Manual.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should incorporate the following strategies for ACECs in the Eastern Colorado RMP when designating ACECs at a landscape-level:

(1) ACEC boundaries should cover the full extent of the resource or value under consideration. Depending on the resource under consideration, resources meeting the relevance and importance criteria can cover a significant amount of acreage. Protecting resources and values that cover a wide geographic extent can present difficult management scenarios. However, as previously mentioned, FLMPA obligates BLM to designate areas of critical environmental concern, regardless of the geospatial arrangement of resources and values. For example, the Taos (NM) RMP designated nine ACECs that cover the majority of the planning area. It is important that BLM recognize resources and values not only for their importance within the Field Office, but also for their contribution to conservation on a regional, continental, and even global scale.

(2) BLM should designate ACECs for landscape-level systems and processes. BLM has historically directed designation of ACECs to protect plant and animal species and natural communities. However, it is important to note that conservation priorities require commitments to also conserve and restore resources and systems, so a broader objective, such as protecting wildlife corridors or watersheds is even more appropriate. Additionally, since the BLM is required to identify relevant and important biological and ecological areas (among others), wildlife corridors and watersheds support the survival of species throughout the greater ecosystem. This is of upmost importance to achieving overall management goals. Public land managers are moving toward designating Areas of Critical Concern and Special Management Areas to protect services and functions at an ecosystem level. The Draft Resource Management Plan Amendment for the St. George Field Office, recently released by BLM, designates the Bull Valley Multi-Species Management Area in all of the draft alternatives. This special designation is proposed in order to protect a wide range of species habitat, migration corridors, and ecosystem services in the area. The management area covers over 83,000 acres of BLM land and provides baseline protections for the area including ROW exclusions, restrictions on fluid minerals, management actions for native species, and limitations on travel and OHV transportation.

(3) Management within ACECs should be tailored specifically to the value or resource being protected. ACEC designation should include specific management prescriptions that will protect the values for which the ACEC has been designated, including addressing energy development, rights-of-way, travel and transportation designations. In designating ACECs that protect natural resources and services at a landscape level, it is possible that boundaries will include numerous resources and conservation values. In this scenario, BLM should create baseline management prescriptions to protect landscape-level values, and provide management actions to specific areas warranting additional attention.

B.1.29.2. Areas of Critical Environmental Concern - Nominations

Total Number of Comments: 57

Summary

Commenters proposed the following ACEC nominations: Arkansas Canyonlands, Arkansas River Corridor (including the Gold Medal stretch), Beaver Creek ACEC and expansion, Birdseye, Castle Garden, Cotopaxi, Cucharas Canyon ACEC and expansion, Droney Gulch, Garden Park ACEC and expansion, Grape Creek, Mosquito Pass ACEC and expansion, Mt. Mestas, Mt. Ouray to Poncha Drainages, North Raton Basin, Phantom, Reinecker Ridge, South Badger.

See Section 2.3.1.20, Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers (p. 28)

Commenter1:Jan Zinkl

Comment Excerpt Text:

designate Mosquito Pass as an area of Critical Environmental Concern

Commenter1:Karl Ford

Comment Excerpt Text:

South Badger ACEC Nomination

This large unfragmented area of BLM lands contains one of the few spring-fed creeks in Colorado. It also contains habitat for a variety of wildlife and plant species. Primitive recreation opportunities abound within this area. The area within the South Badger ACEC includes the following significant resources:

1. Wildlife species: This area contains Bighorn Sheep production and summer concentration areas. Elk and deer winter concentration areas also occur in this area. Part of the area provides winter forage and winter range for bald eagles: a Colorado BLM Sensitive and CWCS Species of Most Concern. Badger Creek is an important spawning stream for Brown Trout. Bear, mountain lion, turkey and many other species inhabit this area.

2. Plant species: The area contains an excellent to good and a fair occurrence of the globally imperiled (G2/S2) Arkansas Canyon stickleaf (Nuttallia densa). Also a larger area of an excellent (A-ranked) occurrence of a globally imperiled (G2G3/S2S3) riparian natural community, narrowleaf cottonwood - Rocky Mountain juniper (Populus angustifolia – Juniperus scopulorum) woodland and a good (B-ranked) occurrence of the globally vulnerable (G3) pale blue-eyed grass (Sisyrinchium pallidum). These areas are ranked as having Very High Biodiversity Significance (CNHP)

3. Scenic: The area contains numerous colorful rugged rocky outcroppings and higher unnamed peaks. Outstanding views of the Sangre de Cristo and Saguache ranges can be had from numerous high vantage points in the unit.

4. Recreation: The area offers outstanding opportunities for primitive recreation, including excellent fishing, wildlife watching, hiking, hunting, backpacking, rock climbing and photography.

5. [Information omitted due to its sensitive nature].

The above resources have the corresponding importance and uniqueness:

1. Plant species and Wildlife Species: This large unroaded and unfragmented area of land and habitat with a year round creek flowing through it is unique for BLM lands.

2. Scenic and recreational values: Rugged scenic terrain with year round sources of water offer unique opportunities for recreation.

Commenter1:Karl Ford

Comment Excerpt Text:

Beaver Creek ACEC Expansion Nomination

Beaver Creek possesses values and resources uncommon to BLM lands. It is highly significant due to its historical context, recreational values, scenic backdrop, rich biodiversity, and nesting sites for threatened and vulnerable species. The current ACEC should be expanded to protect similar values on adjacent BLM lands.

The area within the Beaver Creek ACEC includes the following significant resources:

1. [Information omitted due to its sensitive nature.]

2. Plant species: The current Beaver Creek ACEC encompasses a good occurrence of a globally imperiled riparian natural community, narrowleaf cottonwood / bluestem willow (Populus angustifolia / Salix irrorata) woodland. It has several excellent occurrences of globally vulnerable riparian natural communities: one each of narrowleaf cottonwood / thinleaf alder (Populus angustifolia / Alnus incana) woodland, narrowleaf cottonwood - Douglas-fir (Populus angustifolia - Pseudotsuga menziesii) woodland, and thinleaf alder (Alnus incana) / mesic graminoids shrubland. There is a good occurrence of the globally vulnerable Geyer willow (Salix geyeriana) - mountain willow (Salix monticola) / mesic forbs shrubland, an excellent (A-ranked) occurrence of the state imperiled river birch / starry false lily of the valley (Betula occidentalis / Maianthemum stellatum) shrubland and a good occurrence of the globally vulnerable plains cottonwood - (peachleaf willow) / (coyote willow, sandbar willow) (Populus deltoides - (Salix amygdaloides) / Salix (exigua, interior) woodland. Additionally present is a poor occurrence of the globally vulnerable pale blue-eyed grass (Sisyrinchium pallidum). The adjacent BLM lands share many of these same biodiversity values. The Red Creek Canyon section of the expansion is noted for the globally vulnerable riparian natural community, Douglas-fir / river birch (Pseudotsuga menziesii / Betula occidentalis) woodland.

3. Wildlife species: This area provides critical habitat and nesting sites for the endangered species American peregrine falcon, the threatened species Mexican spotted owl, and Species of Most Concern bald eagle. This area also supports populations of the threatened species swift fox, Rocky Mountain bighorn sheep, black bear, elk, mule deer, white-tailed deer, pronghorn, mountain lion, Aberts squirrel, a Colorado critically imperiled species - Brazilian free tailed bat, and the CPW threatened species Preble's jumping mouse.

4. Recreation: Beaver Creek provides outstanding opportunities for primitive recreation in all seasons, including hunting, hiking, backpacking, camping, rock climbing, wildlife viewing, bird watching, horseback riding, and photography.

The above resources have the corresponding importance and uniqueness:

1. [information omitted due to its sensitive nature.]

2. Plant species and Wildlife Species: Proposed BLM lands are included in the Beaver Creek Potential Conservation Area (PCA) with the B2 category- very high biodiversity significance,

one of three Blue Mountain to Phantom Canyon PCAs with the B3 category- high biodiversity significance, or in a portion of the Fountain Creek PCA with B5 category general biodiversity interest.

3. Recreation: The current Beaver Creek ACEC is noted for its rugged and undeveloped landscape with significant access to primitive recreation, scenic, and wildlife sites. The Beaver Creek ACEC expansion areas share these outstanding values.

Commenter1:Karl Ford

Comment Excerpt Text:

Cotopaxi ACEC Nomination

Bernard Creek possesses values and resources uncommon to BLM lands. It is highly significant due to the occurrence of an imperiled and endemic species. This unit also provides critical production area for Rocky Mountain bighorn sheep.

The area within the Cotopaxi ACEC includes the following significant resources:

1. Plant species: This area has very high biodiversity values due to excellent occurrences of the globally imperiled Arkansas Canyon Stickleaf (Nuttallia densa), endemic to Colorado's Chaffee and Fremont counties. Falls Gulch consists of an uncommon fen-like sedge wetland, which supports the globally vulnerable riparian shrubland, water birch / mesic graminoids (Betula occidentalis / mesic graminoids) natural community. Additionally, there is an excellent occurrence of an apparently globally secure, but state vulnerable wetland natural community, analogue sedge (Carex simulata) herbaceous vegetation.

2. Wildlife species: This area is critical for Rocky Mountain bighorn sheep, as a production area, water source, overall range, and summer and winter concentration areas. This area also supports populations of black bear, elk, mule deer, pronghorn, mountain lion, a Colorado critically imperiled species Brazilian free tailed bat, and the BLM Sensitive Gunnison prairie-dog. Valued bird species also take refuge in this area including the CPW endangered species' American peregrine falcon and Mexican spotted owl, as well as the bald eagle and scaled quail, all of which are listed as species of most concern.

3. Recreation: Bernard Creek provides outstanding opportunities for primitive recreation in all seasons, including hunting, hiking, backpacking, camping, rock climbing, wildlife viewing, bird watching, horseback riding, and photography. This site also provides opportunities for gold medal fishing and world class white-water rafting along the Arkansas River.

The above resources have the corresponding importance and uniqueness:

1. Plant species and Wildlife Species: Proposed BLM lands are included in the Cotopaxi Potential Conservation Area with the B2 category- very high biodiversity significance or the Falls Gulch PCA with the B3 category- high biodiversity significance. Moreover, the Colorado Natural Heritage Program asserts that management urgency is relatively high-needed within the next 5 years to maintain its quality, in reference to the Falls Gulch section of the expansion. This assertion was made in 2014. The Arkansas Canyon Stickleaf is unique only to the Arkansas River Canyonlands in Colorado's Chaffee and Fremont counties. This site is also an important production area for Rocky Mountain bighorn sheep and other critical animal species.

2. Recreation: This area provides outstanding scenic resources and river-related recreation. It also provides outstanding backcountry recreation opportunities in Colorado's Bighorn Sheep Canyon of the Arkansas River Canyonlands.

The resources within the Bernard Creek at Arkansas River ACEC deserve special management because:

- The riparian and wetland areas receive heavy cattle use

- Increased infestation of noxious weeds require management attention.

Commenter1:Karl Ford

Comment Excerpt Text:

Reinecker Ridge ACEC Nomination

Reinecker Ridge possesses values and resources uncommon to BLM lands. It is one of the highest elevation BLM lands in the state, it is highly significant [information omitted due to its sensitive nature] and its contribution to regional and national biodiversity in the form of extreme rich and unique wetland fens and grasslands.

The area within the Reinecker Ridge ACEC includes the following significant resources:

1. [information omitted due to its sensitive nature.]

2. Plant species: This area has very high biodiversity values due to the inclusion of globally rare, unique rich fen wetlands; globally and state rare plants that have adapted to the rich fens, including the globally vulnerable Colorado Tansy-aster (Machaeranthera coloradoensis); rare plant communities including the globally imperiled wetland community Festuca arizonica - Muhlenbergia filiculmis, the world's largest grassland occurrence at 1.3 million acres.

3. Wildlife species: Reinecker Ridge has breeding ground for the globally vulnerable Mountain Plover (Charadrius montanus). It provides habitat for the threatened species, Canadian lynx, an "endangered species candidate," boreal toad, a BLM sensitive species, Gunnison's prairie-dog, and other valued species: elk, moose, mule deer, pronghorn, black bear, mountain lion, bobcat, ermine, goshawk, bald eagle, gold eagle, great horned owl, burrowing owl, and migratory snowy owl.

4. [information omitted due to its sensitive nature.]

5. Recreation: Reinecker Ridge includes outstanding opportunities for primitive recreation in all seasons, including hunting hiking, backpacking, camping, snowshoeing, wildlife viewing, bird watching, horseback riding, photography, and scenic viewing of the Mosquito Range to the west and the Tarryall and Front Range to the east.

The above resources have the corresponding importance and uniqueness:

1. [Information omitted due to its sensitive nature.]

2. Plant species and Wildlife Species: All proposed BLM lands are included in the South Park Megasite and the B2 category - very high biodiversity significance. Estimates suggest that this area supports approximately 15-20% of the total breeding population of the globally vulnerable

Mountain Plover. This unique high elevation BLM land also supports Canadian lynx and boreal toad habitat.

3. Paleontological: Academics have long time studied the area where the mammoth bones and indigenous relics were found since the initial discoveries in the 1930s. This site is of serious paleontological interest as it represents the highest site in elevation that mammoth remains have been discovered.

4. Recreation: This unique ridgeline in South Park provides outstanding scenic resources and big game hunting opportunities. It is the largest and one of the few public land recreation opportunities in South Park, which is one the three large intermontane valleys in Colorado.

Commenter1:Dave Van Manen

Comment Excerpt Text:

Hello, Please include my comments as you make decisions on the Resource Management Plan that you are in the process of developing. I am an avid user and supporter of our public lands, and wok as a professional guide. I recommend that the new resource plan maintain and promote the wilderness values of our public lands to highest degree possible. /in particular, I ask that you support these citizen nominated Areas of Critical Concern.

They overlay large expanses of high quality land that deserve additional protection and strengthen the agency's movement towards a landscape approach to managing public lands.

Arkansas River Corridor ACEC (North of the Arkansas River between Parkdale and Salida)

Multiple sensitive and threatened plant and wildlife resources, important habitat for wildlife resources, sensitive riparian and natural processes, Lands with Wilderness Characteristics and scenic and recreational values.

Phantom ACEC (North of Canon City)

Multiple sensitive and threatened plant and wildlife resources, habitat for the threatened Mexican spotted owl and endangered American peregrine falcon, Lands with Wilderness Characteristics and scenic and recreational values.

Reinecker Ridge ACEC (South Park near Fairplay)

Surrounds the James Mark Jones State Wildlife Area in South Park

Unique rich fen wetlands, multiple sensitive and threatened plant and wildlife resources, breeding Mountain plover, habitat for many mammal and vird species.

[Information omitted due to its sensitive nature.]

Mt Ouray to Poncha Rainages ACEC (South and west of Poncha Springs)

One of the highest BLM lands in the state and highly significant due to its cultural context, and occurrence of imperiled species and montane riparian forests.

Potential habitat and denning for Canadian Lynx.

Garden Park ACEC (South of Cripple Creek)

Expand the existing ACEC to include the expansion of the National Natural Landmark.

Limit disturbance and impact from recreation use on paleontological resources.

Cucharas Canyon ACEC (East of Walsenburg)

Expand the ACEC to protect values of this most easterly surfaceunits nationally

[Information omitted due to its sensitive nature.], high biodiversity with globally vulnerable plant communities and species, elk, whitetail and mule deer, pronghorn, swift and red fox, coyotes, mountain lion and bear.

Outstanding opportunities for primitive recreation in all seasons

Mosquito Pass ACEC (Near Leadville)

Expand the existing Mosquito Pass ACEC to include all lands west of the current boundary.

High concentrations of rare and imperiled plants

Thank you for considering my comments.

Commenter1:Mary Mourar

Comment Excerpt Text:

AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECs)

I support the citizen-nominated ACECs. They include large expanses of high quality land that deserve additional protection. Adding these lands to the list of ACECs will strengthen the agency's movement towards a landscape approach to managing public lands.

Among the recommended ACECs are:

Arkansas River Corridor ACEC (North of the Arkansas River between Parkdale and Salida) includes multiple sensitive and threatened plant and wildlife resources, important habitat for wildlife, including bighorn sheep, and protects sensitive riparian and natural processes. It offers wilderness characteristics and scenic and recreational values.

Phantom ACEC (North of Canon City) for its multiple sensitive and threatened plant and wildlife resources, including habitat for the threatened Mexican spotted owl and endangered American peregrine falcon.

Reinecker Ridge ACEC (South Park near Fairplay)DSC_0832 offers unique rich fen wetlands, multiple sensitive and threatened plant and wildlife resources, including breeding Mountain plover.

Mt Ouray to Poncha ACEC (South and west of Poncha Springs) This is the highest of BLM lands in the RMP and is highly significant due to its cultural context, and occurrence of imperiled species and montane riparian forests. Also, it offers potential habitat and denning for Canadian Lynx.

Garden Park ACEC (South of Cripple Creek) Expand the existing ACEC to include expansion of the National Natural Landmark in order to limit disturbance and impact from recreation use on the paleontological resources and sensitive plant species.

Mosquito Pass ACEC (Near Leadville) The existing Mosquito Pass ACEC should be expanded to include all lands west of the current boundary to protect the high concentrations of rare and imperiled plants.

Organization1:Audubon Society of Greater Denver

Commenter1:Michele Ostrander

Comment Excerpt Text:

We support the citizen-nominated ACECs listed below. They overlay large areas of high-quality lands that deserve additional protection and foster BLM's movement towards a landscape approach to managing public lands. We base our support on the thorough and comprehensive work done by Wild Connections.

- Arkansas River Corridor ACEC

- Phantom ACEC

- Reinecker Ridge ACEC

- Mt. Ouray to Poncha Rainages ACEC

- Garden Park ACEC

- Cucharas Canyon ACEC

- Mosquito Pass ACEC

Commenter1:Jean Smith

Comment Excerpt Text:

Areas of Critical Environmental Concern

I support the citizen nominations for new and expanded ACEC's. These will give BLM an additional tool that can provide specific management and protection for important values and also contribute to landscape-scale planning.

Commenter1:Karyn Ames

Comment Excerpt Text:

Support the Cucharas Canyon (East of Walsenburg) as an Area of Critical Environmental Concern (ACEC)

- It overlays large expanses of high quality land that deserves additional protection.
- It strengthens the agency's movement towards a landscape approach to managing public lands.
- [Information omitted due to its sensitive nature], high biodiversity with globally vulnerable plant communities and species, elk, whitetail and mule deer, pronghorn, swift and red fox, coyotes, mountain lion and bear.
- It provides outstanding opportunities for primitive recreation in all seasons.

Commenter1:Mary Gilkison

Comment Excerpt Text:

I believe Reinecker Ridge should be managed as an Area of Critical Environmental Concern (ACEC) because it is important wildlife habitat and a wildlife corridor. Some of the wildlife in the area is threatened and potentially endangered. This area is surrounded by CPW state wildlife refuge area and should be protected from fragmentation.

Commenter1:Alan Heald

Comment Excerpt Text:

[Reinecker Ridge] Being adjacent to a State Wildlife Area, this should remain forever a non-motorized or mechanized (mountain bike) area. This will compliment and help to protect the wildlife habitat. In addition this area should be protected from oil and gas development. It should be classified as an Area of Environmental Concern (ACEC). This is one of the few places on BLM lands that is a high elevation wetland adjacent to a healthy grassland. This area, the ridge and surrounding state wildlife area, are in a critical wildlife migration corridor according to Colorado Parks and Wildlife staff. It is a CPW identified 'critical wildlife refuge area'. The ACEC designation will provide for the appropriate management strategy here.

Commenter1:Alan Heald

Comment Excerpt Text:

When doing travel management in the Reinecker Ridge area it is important to provide adequate buffer zones so that any adjacent motorized or mechanized recreation does not adversely impact Reinecker and the wildlife area. With regard to oil and gas development, it should simply not be allowed anywhere in the viewshed or soundscape of Reinecker. The addition of roads, even temporary ones, and the 24 houraday noise and light pollution of drilling rigs is simply not appropriate here as it will be highly disruptive to wildlife as well as quiet recreation.

Commenter1:Alan Heald

Comment Excerpt Text:

[Reinecker Ridge] I really enjoy the solitude and lack of ATVS and motorcycles in the area. [information omitted due to its sensitive nature.] This area also has high ecological value in terms of plants due to the presence of rare fens. It is also the breeding ground of the Mountain Plover (15-20% of the species) and habitat for 3 species of owl as well as Goshawk and 2 species of eagle. [information omitted due to its sensitive nature.] With all of these characteristics this area should be managed for preservation of its primitive state.

Commenter1:Anne Akers-Lewis

Comment Excerpt Text:

I encourage you to provide the strongest possible protections to the inventoried areas in the report as well as to preserve the wildlife habitats of the threatened and endangered species in the following areas nominated for protection as Areas of Critical Environmental Concern: Phantom Canyon, the Arkansas River Corridor, Reinecker Ridge, Cucharas Canyon, Mosquito Pass, and Mt. Ouray south and west of Poncha Springs. Also please expand the Garden Park ACEC to

include the Natural National Monument expansion and mitigate damage to the paleontological resources there.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

Nomination of Mt. Mestas as an Area of Critical Environmental Concern

Introduction: In researching oil and gas leasing on Mt. Mestas, several documents were discovered concerning Rock Glaciers and landslide movement going back to the early 20th century. In this era of climate change, the ongoing study of glaciers is critical. Also Mt. Mestas is adjacent to residences and public roads, and the potential for hazards can not be disregarded. Due to time limitations for submitting comments for the BLM ECRMP, a description of Mt. Mestas will be left to narratives in the various documents to follow. The scenic value of Mt. Mestas is irrefutable as photos attest.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

A unique and complex geology: Nomination of North Raton Basin BLM Lands as an Area of Critical Environmental Concern

Introduction: In this section we will put forward the observation that any gas and oil drilling, especially massive fracking scenarios, and produced water injection wells, the latter being more problematic, require great scrutiny in this area.

The Colorado Division of Water Resources determined that the complex geology of the area needs to be adequately addressed.

Northern central Oklahoma and southern Kansas have experienced an extraordinary degree of earthquake activity since introduction of produced water injection in recent years. The geologic complexity of the North Raton Basin far exceeds that of the Oklahoma and Kansas, as we will demonstrate.

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

We will conclude this recommendation that the North Raton Basin be an Area of Critical Environmental Concern by appending a series of articles on induced seismic events.

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

ACEC Designations

-At a minimum, CPW recommends a fine scale assessment of proposed Area of Critical Environmental Concern (ACEC) Designations. CPW recommends, the ACEC designations include, at a minimum, the following: crucial habitats and core areas for State and Federal listed species and species of concern, migration corridors for big game, big game winter habitats in the South Park area, and nests for priority raptor species. The fine scale assessment should describe how these areas will be protected during future management and/ or development; and identification of which specific areas should be avoided for future energy and /or mineral development. CPW anticipates being able to assist with such assessment following seeping to help identify areas of critical environmental concern. These ACEC designated areas may coincide with areas that should be entirely restricted from future mineral development or at least no surface disturbance where mineral development is not compatible with the current surface use.

Commenter1:John Sztukowski

Comment Excerpt Text:

There is an incredible amount fo large intact natural BLM landscapes in Bighorn Sheep Canyon from Salida to Parkdale. These areas - from Badger Creek and Sand Gulch, to Falls Gulch Mountain, Bear Mountain, Echo Canyon, and Table Mountain - provide valuable wildlife habitat, opportunities for recreation in a natural setting, as well as cultural and historical values. This landscape not only protects important watersheds that flow into the Arkansas River, it serves as a scenic viewshed for the world-class boating and fishing opportunities, which help support our local communities. Furthermore, the minimal impacts to this landscape, and contiguity of it, provide a vital species' connectivity core, connecting the Front Range and Wet Mountains to teh Sangre de Cristo Mountains and Mosquito Range. This large landscape also provides the opportunity for wildlife adaptation and movement in a changing climate that may alter the range of sime of the species dependent on Bighorn Sheep Canyon.

A long-term approach should be taken to protect these lands as they are, so that they can continue to be enjoyed by the public and protect the important ecological and wildlife values for the future. Therefore these large natural BLM landscapes in Bighorn Sheep Canyon - Badger Creek, Sand Gulch/Falls Gulch Mtn, Bear Mountain, Echo Canyon/Table Mountain, Backdoor Gulch, and areas contiguous with the McIntyre Hills and Grape Creek WSAs - be managed for the Lands with Wilderness Characteristics and Areas of Critical Environmental Concern.

Commenter1:John Sztukowski

Comment Excerpt Text:

[BLM areas west and south of Poncha Springs (Mt. Ouray Foothills to Poncha Mountain)]The BLM should close some of these motorized routes and provide signage to better direct the public.

How would you like to see this area managed by BLM and why? (For example as a ‘Land with Wilderness Characteristics’ or an ‘Area of Critical Environmental Concern’.)

This area should be managed as Land with Wilderness Characteristics and an Area of Critical Environmental Concern to protect these important recreational, wildlife, and watershed values for the long-term.

Commenter1:Kenneth Sajdak

Comment Excerpt Text:

I particularly am interested in your consideration of the additional ACEC designation For the Cucharas Canyon, a beautiful and historic area I have hiked, an area with profound value to Huerfano County and Colorado, and an area worthy of protection.

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Arkansas River Corridor ACEC (North of the Arkansas River between Parkdale and Salida)

Multiple sensitive and threatened plant and wildlife resources, important habitat for wildlife resources, sensitive riparian and natural processes, Lands with Wilderness Characteristics and scenic and recreational values.

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Phantom ACEC (North of Canon City)

-Multiple sensitive and threatened plant and wildlife resources, habitat for the threatened Mexican spot t ed owl and endangered American peregrine falcon, Lands with Wilderness Charact erist ics and scenic and recreational values.

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Reinecker Ridge ACEC (South Park near Fairplay)

-Surrounds the James Mark Jones State Wildlife Area in South Park

-Unique rich fen wetlands, multiple sensitive and threatened plant and wildlife resources, breeding Mountain plover, habitat for many mammal and vird species.

-Inhabitation by indigenous peoples for millennia.

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Mt Ouray to Poncha Rainages ACEC (South and west of Poncha Springs)

-One of the highest BLM lands in the state and highly significant due to its cultural context, and occurrence of imperiled species and montane riparian forests.

-Potential habitat and denning for Canadian Lynx

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Garden Park ACEC (South of Cripple Creek)

-Expand the existing ACEC to include the expansion of the National Natural Landmark.

-Limit disturbance and impact from recreation use on paleontological resources.

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Cucharas Canyon ACEC (East of Walsenburg)

-Expand the ACEC to protect values of this most easterly surfaceunits nationally

-Multiple historic buildings, evidence of inhabitation by indigenous peoples, high biodiversity with globally vulnerable plant communities and species, elk, whitetail and mule deer, pronghorn, swift and red fox, coyotes, mountain lion and bear.

-Outstanding opportunities for primitive recreation in all seasons

Organization1:Sierra Club

Commenter1:Alan Apt

Comment Excerpt Text:

Mosquito Pass ACEC (Near Leadville)

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

The BLM should evaluate relevance and importance criteria for the newly designate Gold Medal stretch along the Arkansas River corridor for potential additional ACEC determinations.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

[Information omitted due to its sensitive nature.]

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Areas of Critical Environmental Concern (ACECs)

Reinecker Ridge ACEC

Because of the special environmental resource significance of BLM Reinecker Ridge holdings, Park County supports the pending proposal to designate those holdings as an Area of Critical Environmental Concern (ACEC). The indicated BLM holdings must be adequately protected from activities that could adversely impact the Reinecker Ridge area as a critical wildlife refuge area and big game winter range, while also preserving the identified migration corridor from unwanted disruption and the effects of habitat fragmentation. Reinecker Ridge and the contiguous BLM holdings clearly possess wilderness type characteristics. Reinecker Ridge possesses values and resources uncommon to BLM lands. Reinecker Ridge is alsohighly significant due to its cultural and paleontological context and its contribution to regional and national biodiversity in the form of extreme rich and unique wetland fens and grasslands. The resources within the Reinecker Ridge ACEC deserve special management because:

- The area surrounding and including the ACEC is at risk to development.

- Protective management of the area is important to protect values and resources on high elevation wetland and grassland ecosystems, not found elsewhere on BLM lands

- Critical big game migration corridor and habitat needs to be protected from fragmentation as Reinecker Ridge and the surrounding area is a CPW identified wildlife refuge area

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Mosquito Pass ACEC expansion

-Park County supports the pending proposal to expand the Mosquito Pass Area of Critical Environmental Concern (ACEC), in order to protect rare and sensitive plant species, provide habitat for bighorn sheep and help protect the Leadville municipal water supply.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Birdseye ACEC

-Park County supports the nomination of the Birdseye ACEC in Lake County, west of Mosquito Pass, contiguous with the existing Mosquito Range ACEC area. This will protect Boreal Toads and a critical Elk calving area.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Reinecker Ridge ACEC. Park County supports the nomination of the Reinecker Ridge area to be designated an ACEC, in order to protect the rare plants and wildlife (including Mountain Plover) [information omitted due to its sensitive nature.] located there. Protective management of the area is important to maintain values and resources on high elevation wetland and grassland ecosystems not found elsewhere on BLM lands. Critical big game migration corridors and habitat need to be protected from fragmentation as Reinecker Ridge and the surrounding area is a CPW-identified wildlife refuge area.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Mosquito Pass ACEC Expansion. Park County supports the proposed expansion of the Mosquito Pass ACEC, in order to protect rare and sensitive plant species, protect a critical Bighorn Sheep winter concentration area and help protect the Leadville municipal water supply.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Birdseye ACEC. The County supports the nomination of the Birdseye ACEC in Lake County, west of Mosquito Pass,contiguous with the existing Mosquito Pass ACEC area.This will protect Boreal Toads and a critical Elk calving area.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

The County requests that BLM consider a minerals exchange with the Colorado State Land Board, for those minerals below the James Mark Jones State Wildlife Area, in exchange for other BLM minerals within the Eastern Colorado planning area. This would help protect key wildlife habitat adjacent to Reinecker Ridge. Park County supports the nomination of Reinecker Ridge as an ACEC, and the proposed extent of this ACEC covers the state lands and minerals associated with the James Mark Jones State Wildlife Area. Therefore, we encourage contiguous mineral ownership and associated ACEC protections such as NSO for this critical wildlife habitat and the nationally significant cultural and prehistorical resources found in the Reinecker Ridge ACEC area.

Commenter1:Emil McCain

Comment Excerpt Text:

This area [Cucharas Canyon] needs to be protected as an Area of Critical Environmental Concern (ACEC) because of these antiquities, the ranching heritage it contains and to protect the wildlife there.

Commenter1:Emil McCain

Comment Excerpt Text:

I recommend that the rock glaciers of Mt. Mestas be nominated as a hazardous and critical climatological resource and be managed as an Area of Critical Environmental Concern.

Commenter1:Emil McCain

Comment Excerpt Text:

I recommend that all of the North Raton Basin BLM managed land be nominated and managed as an Area of Critical Environmental Concern because of its unique and complex geology

Commenter1:Jim McCain

Comment Excerpt Text:

I recommend that all of the North Raton Basin BLM managed land be nominated and managed as an Area of Critical Environmental Concern because of its unique and complex geology

Commenter1:Jim McCain

Comment Excerpt Text:

I recommend that the rock glaciers of Mt. Mestas be nominated as a hazardous and critical climatological resource and be managed as an Area of Critical Environmental Concern.

Commenter1:Rosalyn McCain

Comment Excerpt Text:

Cucharas Canyon east of Walsenburg contains valuable Native American rock art and artifacts. A friend who lived on the rim of the canyon found unending rock art and numerous artifacts that she left intact for others to enjoy in the canyon. Another friend found a pouch filled with arrowheads identical but for their size. Each one was made out of the same stone and each one smaller than the one before and identical. He also left everything he found there out of respect for the maker of such an offering. This area needs to be protected as an Area of Critical Environmental Concern (ACEC) because of these antiquities, the ranching heritage it contains and to protect the wildlife there.

Commenter1:Deb Overn

Comment Excerpt Text:

I understand there are a number of citizen-nominated ACECs, including the Arkansas River Corridor ACEC (north of the river between Parkdale and Salida), and another personal favorite, the Phantom ACEC (north of Canon City). These proposed ACECs are home to multiple sensitive and threatened plant and wildlife populations, and include important habitat and riparian areas. Reinecker Ridge ACEC (South Park near Fairplay) surrounds the James Mark Jones State

Wildlife Area in South Park, and includes unique fen wetlands, habitat for many sensitive and threatened plant and wildlife species like the Mountain plover. I would encourage BLM to expand certain existing ACECs, including Garden Park ACEC (South of Cripple Creek) to include the expansion of the National Natural Landmark, and Mosquito Pass ACEC to include appropriate lands west of the current boundary. These areas have high concentrations of rare and imperiled plants, and resource value personally very important to me.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

We plan to submit full and complete formal nominations for two new ACEC's as soon as possible. These will include nominations for a Birdseye ACEC near Leadville, and a nomination for a new Castle Garden ACEC near Salida.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

We especially would like the BLM to consider expanding the existing Mosquito Pass ACEC. There is very high priority habitat for Bighorn Sheep that must be considered as part of this ACEC. We have witnessed firsthand the negative impacts unmanaged uses are having on these sheep in this area. We have also seen the impacts unregulated snowmobile use has had on fragile alpine plants.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

ACEC Nominations

BLM should fully consider and ultimately designate the following nominations for Areas of Critical Environmental Concern. The areas meet relevance criteria and importance criteria as established in BLM Guidance 43 CFR 1610.7-2. Full ACEC nominations for these areas are in Appendix E of these comments.

(i) Arkansas River Corridor ACEC. BLM should designate the entire 116,200 acre area defined in the enclosed nomination as an Area of Critical Environmental Concern. The proposed Arkansas River Corridor ACEC is based upon scientifically supported information, and includes both site-specific and landscape level conservation considerations. The proposed Arkansas River Corridor ACEC contains numerous resource values, as defined by the BLM ACEC Manual 1613, and qualifies for ACEC designation. These relevant and important values include multiple sensitive and threatened plant and wildlife resources, important habitat for wildlife resources, sensitive riparian and natural processes, land with wilderness characteristics and scenic and recreational values.

In order to focus specific management efforts for the unique values encompassed within the entire Arkansas River Corridor ACEC, the area has been divided into four separate management zones; 1) Sweetwater Gulch zone, 2) Badger Creek zone, 3) Cotopaxi zone and, 4) Canyonlands zone (see Map 1.0). Provided for each zone is a summary of the site-specific ecological values and the special management prescriptions needed to conserve them. This information is described in the "Management zones: site-specific relevance, importance and special management prescriptions" section of the proposal.

While each of these zones contain numerous site-specific ecological values that meet the relevance and importance criteria, the landscape level perspective best captures and characterizes all of the values within the Arkansas River corridor. This landscape level approach to conservation is based upon the most current scientific advances in landscape ecology, conservation biology, and biogeography. This strategy for conservation recognizes the collective management of ecological resources, as one continuous landscape, and is the most scientifically robust, and best-practice strategy for natural resource conservation.

See Attachment E.1 for official Arkansas River Corridor ACEC nomination, submitted meeting requirements and criteria for an Area of Critical Environmental Concern nomination.

(ii) Phantom ACEC. BLM should designate the entire area defined in the Phantom ACEC nomination (see Map 2.0). The proposed Phantom ACEC is based upon scientifically supported information, and includes both sitespecific and landscape level conservation considerations. The proposed Phantom ACEC contains numerous resource values, as defined by the BLM ACEC

Manual 1613, and qualifies for ACEC designation. These relevant and important values include multiple sensitive and threatened plant and wildlife resources, crucial habitat for the threatened Mexican Spotted Owl (Strix occidentalis lucida), known habitat for the American Peregrine Falcon (Falco peregrinus anatum), a federally Endangered subspecies, sensitive riparian and natural processes, land with wilderness characteristics, and scenic and recreational values.

See Attachment E.1, for official Phantom ACEC nomination, submitted meeting requirements and criteria for an Area of Critical Environmental Concern nomination.

(iii) Reinecker Ridge ACEC. BLM should designate the public land surrounding the James Mark Jones State Wildlife Area in South Park as the Reinecker Ridge ACEC. The area has significant ecological and wildlife values, [information omitted due to its sensitive nature], and represents a unique contribution to the portfolio of BLM lands.

Reinecker Ridge has very high biodiversity values due to the inclusion of globally rare, unique rich fen wetlands; globally and state rare plants that have adapted to the rich fens, including the globally vulnerable Colorado Tansy-aster (Machaeranthera coloradoensis); breeding ground for the globally vulnerable Mountain Plover (Charadrius montanus). It provides habitat for the threatened species, Canadian lynx, an "endangered species candidate," boreal toad, a BLM sensitive species, Gunnison's prairie-dog, and other valued species: elk, moose, mule deer, pronghorn, black bear, mountain lion, bobcat, ermine, goshawk, bald eagle, gold eagle, great horned owl, burrowing owl, and migratory snowy owl.

[information omitted due to its sensitive nature.]

The lands encompassed in the Reinecker Ridge ACEC are at risk to oil and gas development, wind energy development and other activities that would harm or destroy the important resources detailed above and in our ACEC proposal. Protective management of the area is important to protect values and resources on high elevation wetland and grassland ecosystems not found elsewhere on BLM lands.

See Attachment E.2, for official Reinecker Ridge ACEC nomination, submitted meeting requirements and criteria for an Area of Critical Environmental Concern nomination.

(iv) Mts Ouray to Poncha Drainages ACEC. These mountain foothills and drainages possess values and resources uncommon to BLM lands. It is one of the highest BLM lands in the state and highly significant due to its cultural context, and occurrence of imperiled species and montane riparian forests. This unit also provides potential habitat and denning for an endangered species, Canadian Lynx.

The area within the Mts Ouray to Poncha Drainages ACEC includes cultural, plant and wildlife, and watershed resources. [Information omitted due to its sensitive nature.]

Proposed BLM lands are included in the Pahlone Slopes Potential Conservation Area and the Pass Creek Potential Conservation Area, both with the B2 category - very high biodiversity significance. This unit also possesses one of the largest, if not the largest Douglas fir tree in the state at approximately 22 feet in diameter, calculated by diameter at breast height (DBH). Importantly, this small outstretch of BLM lands encompasses many critical riparian areas, forming a greater watershed, including Greens Creek, Pass Creek, Cochetopa Creek, and Poncha Creek.

Protective management of the area is important to protect cultural and natural values and resources on high elevation riparian and forest ecosystems, very uncommon elsewhere on BLM lands.

See Attachment E.3, for official Mts Ouray to Poncha Drainages ACEC nomination, submitted meeting requirements and criteria for an Area of Critical Environmental Concern nomination.

(v) Cucharas Canyon ACEC. Cucharas Canyon possesses values and resources uncommon to BLM lands. Not only is it one of BLM's most easterly surface-units nationally, it is highly significant due to its rich historical context and its contribution to regional and national biodiversity in prairie and riparian ecosystems. The Cucharas Canyon ACEC was included in the 1995 RMP, and should be expanded to adequately protect invaluable resources. The area within the Cucharas Canyon ACEC includes [information omitted due to its sensitive nature]; high biodiversity values due to the inclusion of globally vulnerable plant communities, plant species such as the state critically imperiled Elton's lip fern (Cheilanthes eatonii) and vulnerable Simius roadside skipper (Amblyscirtes simius); and wildlife species including elk, both whitetail and mule deer, pronghorn, swift and red fox, coyotes, mountain lion and bear.

The resources within the Cucharas Canyon ACEC deserve special management because the riparian and wetland areas receive heavy cattle use; increased infestation of noxious weeds including Tamarisk and Russian Thistle require management attention; and the area surrounding the ACEC is at risk from increased off-highway motorized use and illegal motorized recreation.

See Attachment E.4, for official Cucharas Canyon ACEC nomination, submitted meeting requirements and criteria for an Area of Critical Environmental Concern nomination.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Garden Park ACEC. BLM should expand the existing ACEC to include the expansion of the National Natural Landmark. In addition, BLM should clarify and enhance management protections for resources contributing to the ACEC designation. BLM should provide management direction on actions to limit disturbance and impact from recreation use on paleontological resources. BLM should also ensure collaboration and coordination with the National Park Service throughout the RMP process as well as in implementationlevel management activities. Local groups, including the Garden Park Paleo Society, should also be included on RMP planning and management following the Record of Decision.

Management should include, but not limited to, temporary closures and travel restrictions, seasonal and weather closures, and best management practices for protection of paleontological resources. It is also our understanding that there is an existing target shooting area in this area that has grown in popularity significantly in recent years. It is highly questionable whether the Dinosaur Flats shooting area supports the goals and objectives for the Garden Fossil Park National Natural Landmark and the Garden Park ACEC. The noise from this high density target shooting, particularly in the fall months, is just one of many impacts that significantly degrade the visitor experience in a nationally-recognized paleontological site. Evidently, The Gold Belt TMP asserts that target shooting in the Dinosaur Flats portion of the Garden Park sub-unit would be phased out upon identification of a suitable replacement. BLM Royal Gorge Gold Belt TMP EA at 10. BLM should conduct a safety and management compatibility review for the Dinosaur Flats shooting area prior to releasing its preliminary draft alternatives report.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Mosquito Pass ACEC. BLM should expand the existing Mosquito Pass ACEC to include all lands west of the current boundary. The BLM land outside Leadville is some of the highest public land in the nation. These resource values in the expansion area are largely congruent with the resources warranting protection in the current ACEC. This area contains some of the highest concentrations of rare and imperiled plants in the state. The area includes all known occurrences of Mosquito Range mustard (Eutrema edwardsii ssp. penlandii), a federally threatened species, and Weber's draba (Draba weberi), a critically imperiled (G1) species. In addition nine globally imperiled (G2) plant species and nine other globally vulnerable (G3) plant species are found in this area. Expansion of this ACEC includes additional lands within the CNHP Mosquito Range Very High Biodiversity Potential Conservation Area, including additional lands within CPW identified Bighorn Sheep summer and winter concentration areas as well as lynx and wolverine historical habitat.

BLM should expand the boundary to provide an adequate buffer for protecting resources in the ACEC and in addition, create robust management prescriptions for the area. Grazing restrictions to protect imperiled plant species should be considered for retention. BLM should prioritize the area for travel management planning, and ensure a minimum route network for OHVs that reduces potential impact to sensitive resources. The area should be closed for fluid mineral leasing and mineral entry, and managed as a VRM Class II.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Birdseye ACEC. The Birdseye area likely has exceptional resource value that meets BLM's relevance and important criteria. Accordingly, we recommend BLM consider designating the area for protection of its biological and scenic values. Based upon our resource information for the area, BLM should consider the following factors in designating a Birdseye ACEC. This unique high altitude area of BLM lands contains one of the few remaining active breeding locations for a Colorado endangered species. It also contains occupied habitat for a federally threatened species and imperiled plants, as described below. It provides important habitat for big game and is the backdrop for a scenic passenger train ride.

The area within the Birdseye ACEC includes the following significant resources:

-Wildlife species: This area contains an active breeding site for a globally critically imperiled species of Boreal Toad (Bufo boreas boreas). These toads are a Colorado Endangered Species and are moving toward federal listing under the Endangered Species Act. Populations of this species are rapidly declining, and there are only ~50 or fewer recently active breeding locations known statewide. This location is likely the only known recently (2014) active breeding location for this species on BLM land in all of Colorado. The area is known occupied habitat for threatened Canadian Lynx (Lynx Canadensis) and an important lynx linkage has been identified in this area. Elk, deer, bear, Rocky Mountain Bighorn Sheep and other species inhabit this area. The area is a summer concentration area for deer and elk, an elk production area, and part of a migration area for these species.

-Plant species: The area is adjacent to the existing Mosquito Pass ACEC. This location is a botanical hotspot in Colorado, containing numerous rare and imperiled alpine plant species. The Birdseye ACEC includes lands within the boundary of the CNHP Outstanding Biodiversity Significance Mosquito Range PCA for these plants. The BLM lands in the valley include the headwaters of the Arkansas River, and the riparian and wetland area is part of the CNHP Very High Biodiversity significance East Fork Arkansas River at Delmonica Gulch PCA. This site contains a good (B-ranked) occurrence of a globally imperiled (G2G3/S2S3) montane willow carr plant community (Salix ligulifolia).

-Scenic: The area contains forested slopes, alpine areas, rocky scree fields and riparian areas that include the immediate corridor for the Leadville Colorado and Southern scenic passenger train ride. This historic railroad route has existed for over 120 years.

-The Top of the Rockies Scenic Byway also passes through this area.

The above resources have the corresponding importance and uniqueness:

-Plant species and Wildlife Species: Federally threatened lynx, State endangered and globally critically imperiled toads, and rare and imperiled plant species are all found in this area.

-Scenic and historic railroad: The corridor of this historic passenger train passes through BLM land in this area

The resources within the Birdseye ACEC deserve special management because:

-Boreal toads populations are rapidly declining and the species occupies less than 1% of its historical range. Any and all efforts to prevent further declines and negative impacts to known active breeding locations should be taken.

-Federally threatened lynx occupy this area and one of the few linkages which will allow this species to spread into the Mosquito Range exists here.

-The most scenic segments of the rail line occur on BLM land.

-Unmanaged recreation and development could threaten the values and vulnerable resources on BLM lands in this area.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Castle Gardens ACEC. The Castle Gardens area likely has exceptional resource value that meets BLM's relevance and important criteria. Accordingly, we recommend BLM consider designating the area for protection of its biological and scenic values. Based upon our resource information for the area, BLM should consider the following factors in designating a Castle Gardens ACEC.

Castle Gardens is a unique BLM area. It contains some of the few exemplary populations of imperiled plants in a fragile but scenic landscape and important wildlife habitat. Increasing human use and activity in the area make it and the ecological processes it contains vulnerable.

The area within the Castle ACEC includes the following significant resources:

-Plant species: This area contains concentrations of critically imperiled Brandegee wild buckwheat (Eriogonum brandegeei). The area also contains the globally imperiled Fendler's townsend-daisy (Townsendia fendleri) and Arkansas Canyon Stickleaf (Nuttallia densa). The buckwheat and stickleaf are Colorado endemics with extremely limited worldwide ranges primarily on Royal Gorge Field Office lands.

-Wildlife species: Elk, deer, bear, turkey, coyotes inhabit the area. Numerous species of birds including owls and raptors frequent the area. The area is a winter concentration area for Mule Deer and elk (CPW).

-Scenic: The unique scenic landscape and geologic formations were promoted as an attraction by the D&RG Railroad and City of Salida in the 1880s. In 1915 President Woodrow Wilson offered the federal land to the City of Salida as a park (The City declined). People still enjoy viewing the unique badlands-like landscape, hoodoos and other interesting geologic formations in the area.

-Recreation: Designated trails passing through the area attract hikers, walkers, bikers and others. People also enjoy nature study, viewing wildlife, and hunting in the area.

The above resources have the corresponding importance and uniqueness:

-Plant species and Wildlife Species: The area has outstanding biodiversity values as one of the three best (of ~5 total) global occurrences of the critically imperiled Brandegee wild buckwheat. Also contains 2 other globally imperiled plants and is a winter concentration area for big game.

-Recreation: The area is easily accessible and scenic, and is attracting increasing numbers of recreationists.

The resources within the Castle Garden ACEC deserve special management because:

-Unauthorized use by OHVs and mountain bikes, and hikers going off route, continue to negatively impact Buckwheat and contribute to erosion of the fragile Dry Union formation soil habitat.

-A major utility corridor passing through the upper southern boundary of the area will require management to ensure continued habitat viability.

-Easy motorized access and proximity to the City of Salida results in unmanaged dispersed camping, dumping, and other damaging activities.

-Protective management of the area is important to protect values and vulnerable resources on BLM lands.

Commenter1:Suzanne Watson

Comment Excerpt Text:

After attending the meetings and studying the material it seems important to me that all of the North Raton Basin BLM managed land become an area of critical environmental concern because of its unique and complex geology

Commenter1:Suzanne Watson

Comment Excerpt Text:

that the rock glaciers of Mt. Mestas become an area of critical environmental concern as a critical climatological resource

Commenter1:Claude Neumann

Comment Excerpt Text:

Areas Of Critical Environmental Concern (ACEC's) – Referring again to the inventory done by the Group "Wild Connections", cited were numerous areas for nomination. While I have not visited these areas and cannot speak directly about them, I encourage the BLM to review those findings with the utmost consideration to special protection of those areas containing threatened species, sensitive riparian areas, and rich biodiversity.

Organization1:ArkansasValley Audubon Society

Commenter1:SeEtta Moss

Comment Excerpt Text:

The area covered by the Eastern Colorado Resource Management Plan includes a number of locations with special natural resource values including the following:

Areas of Critical Environmental Concern (hereafter referred to as ACEC's):

1. Arkansas Canyonlands,
2. Beaver Creek,
3. Browns Canyon,
4. Cucharas Canyon,
5. Droney Gulch,
6. Garden Park,
7. Grape Creek,
8. Mosquito Pass

9. Phantom Canyon

[The natural resources in the Eastern Colorado Resource Management Plan including all of these ACEC's, much of the habitat for Threatened and Endangered Species and other special status species are at risk of degradation and/or fragmentation due to other permitted uses including mineral and energy development, recreation. as well as timber harvesting and livestock grazing. With the increases in population driving the numbers of citizens accessing BLM lands, increases in energy development on BLM lands along with impacts from Climate Change it is essential that BLM take necessary steps to protect our valuable natural resources in order to meet the mission of BLM, “"to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations." Clearly the productivity of these public lands for future generations will be diminished if the land health is not protected by actions taken in this Resource Management Plan.]

Organization1:Greater Arkansas River Nature Association (GARNA)

Commenter1:Alison Ramsey

Comment Excerpt Text:

There are 7 citizen-nominated Areas of Critical Environmental Concern proposed by Wild Connections. The GARNA Board respectfully requests that the BLM look closely at these specific 7 areas because it is our opinion based on data from Wild Connections that these large expanses of land deserve additional protection and doing so would bolster BLM's move towards a landscape approach to managing public lands. We urge the Royal Gorge Field Office of the BLM to give Wild Connections' report careful consideration when updating its resource management plan and environmental impact statement now under consideration.

B.1.30. National Trails

B.1.30.1. National Trails - Alternatives

Total Number of Comments: 1

Summary

One commenter opposes the designation of national scenic and historic trails.

See Section 2.3.1.20, Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers (p. 28)

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

4. Historic Preservation Programs: The 2015 AMS, Chapter 4, Management Opportunities, Section 4.4.6, National Scenic and Historic Trails (pages 362-63), states that RGFO intends to “scope the public to see if they recommend or want to nominate a national scenic and historic trail.”

a. Historic preservation programs like the national scenic and historic trails are designed to control the use of property through the use of federal tax dollars. CICA vehemently opposes the designation of national scenic and historic trails. The BLM must restrict its analysis to public lands and not include any private lands within any scoping it undertakes into such designations. BLM must not forget that its authority and jurisdiction is restricted to public lands

B.1.31. Wilderness and Wilderness Study Areas

B.1.31.1. Wilderness and Wilderness Study Areas - Alternatives

Total Number of Comments: 5

Summary

Commenters provided recommendations for WSA management, including the following:

- release existing WSAs from wilderness consideration and manage as ACECs
- allow livestock grazing to continue in proposed wilderness
- do not designate primitive routes in WSAs
- to maintain roadless character, prohibit creating new permanent roads and limit vehicle traffic to designated routes

See Section 2.3.1.20, Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers (p. 28)

Commenter1:Renee Day

Comment Excerpt Text:

Logging is something that can be done with careful oversite and done responsibly to take the fallen and beetle damaged trees which we know will reduce the fuel for wildfires, so while I would love not having ANY activity in these areas, there are some that are needed and valuable if done properly.

Commenter1:Nancy Oswald

Comment Excerpt Text:

In our area, some of the BLM land is being looked at by environmental groups as a proposed wilderness area. I think this would be a mistake both economically and environmentally to remove this land from grazing. From a taxpayer standpoint, I believe the government is better off spending money to support and manage agricultural leases than it would be managing for more wilderness or supervising land for recreational use or camping.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Should the BLM release existing WSAs and ISAs from wilderness consideration within the next resource planning cycle, we request the BLM prepare the four WSAs and ISA areas as ACECs or Backcountry Conservation Areas (BCAs), due to their unique and often remote qualities. Though we would rather see these areas continue as WSAs and ISA, an ACEC or BCA designation would allow further protection for these special places.

Commenter1:Kristin Skoog

Comment Excerpt Text:

The roadless character of wilderness should be maintained, to allow for continuous habitats and connectivity for wildlife. No new permanent roads should be built, and vehicle traffic should be limited to designated routes.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should not designate primitive routes in WSAs in the Eastern Colorado RMP or any subsequent travel planning process. In addition, primitive routes will not be made a part of the transportation system, classified as a transportation asset, or entered into the Facility Asset

Management System (FAMS) unless: (1) The routes are designated as non-motorized and non-mechanized trails, or (2) Congress releases the WSA from Wilderness consideration. See, Manual 6330; Manual 1626.

Recommendations: BLM should not designate primitive routes in WSAs in the Eastern Colorado RMP or any subsequent travel planning process. BLM should commit to monitoring the WSAs for unauthorized recreation access and adopt appropriate enforcement measures as necessary.

B.1.32. Wild and Scenic Rivers

B.1.32.1. Wild and Scenic Rivers - Alternatives

Total Number of Comments: 6

Summary

Commenters had differing viewpoints on wild and scenic rivers suitability and management. One commenter stated that the BLM should require that eligible and suitable segments are protected pending decisions. Another opposed all WSR designations and stated that the BLM should consider impacts on private property rights in evaluating river segments. In addition, one commenter specifically requested that the BLM reevaluate the Badger Creek segment.

See Section 2.3.1.20, Congressional and Administrative Designations, including ACECs, National Trails, Wilderness and Wilderness Study Areas, and Wild and Scenic Rivers (p. 28)

Organization1:Colorado Parks & Wildlife

Commenter1:Steve Yamshita

Comment Excerpt Text:

CPW understands that as part of this ECRMP, the BLM is mandated under Section 5 (d)(1) of the Wild and Scenic Rivers Act to assess whether any of the rivers and streams in the planning area would be appropriate for addition to the National Wild and Scenic Rivers System. CPW is willing to assist in this analysis and feels this process is a very important aspect to the overall ECRMP process.

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

3. Water Management: The 2015 AMS, Chapter 4, Management Opportunities, Section 4.4.3, Wild and Scenic Rivers (pages 360-61), states that the “RMP will re-evaluate all streams in the planning area for eligibility and suitability.” Further, the 2015 AMS states, “If any stream segments are found to be suitable, the land use plan will implement interim management procedures to maintain the ORVs, water quality, classification, and free-flowing conditions found in the river segment. For example, the plan may contain management prescriptions and land use authorization stipulations necessary to maintain the river-related values.”

a. Any federal program or land use control that directly or indirectly attempts to manage the non-navigable headwaters of the rivers and streams in Colorado is an usurpation of the State's authority. The Department of the Interior (DOI) has taken unwarranted steps to interject itself into states' management of their water. The BLM must consider Colorado's right to manage its water and the overreach the Wild and Scenic Rivers Program causes.

b. CICA encourages BLM to guide its managers to listen to the landowners who have worked the land for hundreds of years and who understand the importance of water to their agricultural operations.

c. CICA vehemently opposes Wild and Scenic Rivers designations. Stipulations on the management of stream segments cause infringements on appropriator's water rights. BLM must consider such private property rights before it evaluates streams in the planning area .

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

The BLM should adopt requirements to ensure eligible and suitable Wild and Scenic Rivers are protected pending decisions on their designation. The values of these rivers should not be allowed to degrade further.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

We think Badger Creek should be reevaluated, as it a unique watershed flowing through a long segment of wild and untrammeled BLM land with outstanding scenic and recreational values.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Whatever the ultimate collection of stream segments found to be suitable, all those segments should be subject to all available protective measures. Such measures include (but are not limited to) managing all suitable segments:

-closed to off-highway vehicle use;

-withdrawn from mineral entry;

-as VRM Class I or Class II areas;

-as right-of-way exclusion areas;

-subject to remedial actions to ensure sensitive species habitat is maintained or enhanced;

-subject to extensive and reliable no-surface-occupancy stipulations for all activities;

-with related ACECs closed to off-highway vehicle use;

-with related ACECs closed to oil and gas exploration and development;

-among other appropriate measures.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Since more detailed management decisions about stream segments would be made later in the suitability determination phase, as part of the current RMP revision or in subsequent amendments, it makes sense to list as eligible all segments that have any variation of the primary eligibility criteria, including even one outstandingly remarkable value. When in doubt, include them as eligible.

B.1.33. Socioeconomics and Environmental Justice

B.1.33.1. Socioeconomics and Environmental Justice - Baseline Affected Environment

Total Number of Comments: 27

Summary

Commenters provided information on current economic industries important for local communities, including tourism, livestock grazing, OHV recreation, and oil and gas development. Specifically, commenters noted that tourism and recreation play essential roles for Salida, Cañon City, and Chaffee County. Access to trails and open spaces, visitors, and related economic development was mentioned. One commenter noted that the role of BLM-administered lands in providing ecosystem services should be recognized. In addition, one commenter noted that Huerfano County meets criteria for environmental justice consideration.

See Section 2.3.1.21, Socioeconomics and Environmental Justice (p. 29)

Organization1:Audubon Society of Greater Denver

Commenter1:Nancy Stocker

Comment Excerpt Text:

the total economic impact of wildlife watching in Colorado in 2012 was estimated to be $2.28 billion. Because of the unique birds and other wildlife in eastern Colorado, the region we're

talking about today receives significant local, national and international tourism and the related economic benefit.

Commenter1:Michael White

Comment Excerpt Text:

Huerfano County is a poor one, having the State's highest unemployment rate, 9.6%, with roughly 21% of residents living below the Federal poverty level, and 30% of its families on food stamps. Its minority (nonwhite) population is almost 40% of the total. (USBLS, 2015; USCB, 2014).

--Huerfano County meets the "criteria for environmental justice consideration" and should be so considered in BLM's revision of the RMP insofar as it affects "social and economic conditions" within the county.

--More specifically, since mineral leasing revenue is of significant importance to Huerfano County, concepts of environmental justice should guide the BLM's development of the RMP in that county to ensure that C:\My Files\HCPC\BLM minerals\20150629 Scoping Issues.doc BLM implementation contributes to prosperous communities with full employment.

Commenter1:Tim Krantz

Comment Excerpt Text:

Southern Teller County communities of Cripple Creek and Victor economies rely heavily on tourism. This area markets its mining area heritage as a focal point and the BLM land in this area is positioned along highway 67 and County Road 61 the main access route to the area. The open space that the BLM land and its associated grazing allows for, make for exceptional scenery featured in marketing for the tourism in the area that is consistent with the heritage mountain experience.

Organization1:High Rocky Riders

Commenter1:Charles Burton

Comment Excerpt Text:

I might suggest that you also reference the COHVCO document: "Economic Contribution of Off Highway Vehicle Recreation in Colorado," July, 2009, 25pp (attached) to show there are economic benefits provided by OHVs.

Organization1:The Pew Charitiable Trust

Comment Excerpt Text:

Tourism based on Eastern Colorado's outstanding and varied recreational

opportunities plays an essential role for the economies of nearby communities such as Salida and Canon City. The Gorge's wild and remote public lands, including Cooper Mountain, Badger Creek, and Sand Gulch, deserve management that keeps them accessible to hikers, campers and sportsmen. The values that these unspoiled places offer to local communities as well as out of state tourists deserve to be protected. I support a plan that provides for primitive, backcountry recreation and preserves the sights and sounds of nature.

Commenter1:LuAnn Glatzmaier

Comment Excerpt Text:

Tourism is the #1 industry in CO, and millions of people come there for their health and recreation. It is both nationally and regionally vital that Colorado be protected, as should all states. It has been violated on all sides by urban sprawl and now is the time to stop all environmental violations in Colorado. It must continue to be a place for the nation to heal, not be eliminated from that vital process.

Commenter1:Thomas Jacobson

Comment Excerpt Text:

The BLM lands in the Salida area are generally in close proximity to the city and provide year round opportunity for recreation. While grazing and extraction on BLM may provide economic returns in other communities, clearly here in Chaffee County recreation is the primary benefit.

Commenter1:Thomas Jacobson

Comment Excerpt Text:

Additionally, locally nonmotorized users are the fastest growing segment. Since the Travel Management plan of 2006, we have grown our trail system in to a respectable 36 miles of mostly sustainable non motorized trails (including some on Forest Service land adjoining BLM land). This growth in trail construction has not only provided great 'backyard' recreation to local hikers, runners, and mountain bikers, but has also attracted many similar users from the front range and higher mountain towns which don't see melt out until much later in the summer. Trail counters have shown substantial annual increases in users.

Commenter1:Thomas Jacobson

Comment Excerpt Text:

Local hotels and restaurants have thrived from these out of town visitors reporting that mountain bikers now make up one of the top three visitor groups along with rafters and skiers.

Commenter1:Thomas Jacobson

Comment Excerpt Text:

Construction costs are being raised through local donations including the city of Salida, Chaffee county, 160 local dues paying members to Salida Mountain Trails, as well as donations from the three local bicycle shops, and donation tubes at several trail heads. Recognizing that trail users are a substantial segment of their business, two local restaurants have instituted a 1% voluntary donation added to the checks to support local trail development. Trails constructed since the 2006 TMP have been built to IMBA design standards for a pleasant user experience, as well as long term sustainability. The local trail organization Salida Mountain Trails has made a commitment to maintaining as well as building trails, so that BLM staff resources are not intensively required to maintain the system.

Commenter1:Tadini Bacigalupi

Comment Excerpt Text:

I also want to encourage you to especially take into consideration Ecosystem Services as discussed in the comments by Wild Connections. These services have been overlooked by Federal Agencies in the past, and it is time to remember that when these services are lost, there are true economic losses for all people within a region. Too often we take services like water purification and provision, carbon sequestering, or contiguous healthy habitat for granted. These and so many of the other ecosystem services have been ignored for so long, that their loss is not even considered as important in the public planning process. This should no longer be the case.

Commenter1:Nancy Oswald

Comment Excerpt Text:

Please consider the value of ranching and agricultural leases when updating the Eastern Colorado Resource plan. Not only do ranches contribute economically to rural communities, but they provide and protect open space and contribute to healthy ecosystems. Well managed grazing improves soil and helps with mineral recycling. Studies have shown that land left dormant or fenced off from animal impact declines in plant diversity and overall soil health. Also, cattle can make use of otherwise unfarmable land to produce food for humans.

Commenter1:Bill McCormick

Comment Excerpt Text:

Our trails on BLM lands have brought additional visitors to our community which is dependent on the tourist economy.

Commenter1:Bill McCormick

Comment Excerpt Text:

Our local BLM lands are not candidates for extraction or more grazing thus the highest economic use is recreation.

Commenter1:Nate King

Comment Excerpt Text:

These trails have a huge (economic) impact on the Salida area.

Organization1:Think Outside

Commenter1:Paige Teegarden

Comment Excerpt Text:

We've seen first hand how the access to trails from town has increase people who are visiting the area and in our case, moving (and buying homes) in the area. This is critical to Salida and Chaffee County's on-going economic development. The area will need to compete with other regions that are making trails a priority or risk losing visitors over time.

Commenter1:Gregg Grant

Comment Excerpt Text:

An analysis should be done to understand the priorities for the population who use public lands and not rely on the most vocal group or best funded view.

-Less impact on the terrain – a study should be conducted to understand impact of nonmotorized vs. motorized. Examples of

-Less impact on noise – noise studies should be carried out for either scenario similar to what has been done by the BLM in other states.

- Less budget/resource due to less enforcement required

ii. Budget/resources – whether for nonmotorized or motorized use, an expansion of the current system would require funding for additional Rangers as well as potentially trail head facilities. Ranger requirements would be greater for OHV use as enforcement duties are more intensive. An analysis should be carried out to confirm that additional funding would be available throughout and beyond the Plan duration to support expansion.

Commenter1:Misi Ballard

Comment Excerpt Text:

Strong protection of these lands will also protect and strengthen the local economy.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Four strategic plans and studies have independently drawn similar conclusions: Park County's outdoor recreation economy is highly dependent on effectively managing public lands that draw people to this area.

-Within the last 20 years Park County has become a high-altitude proving ground for hikers, mountain bikers, anglers, and OHV enthusiasts. Thirty-one public campgrounds are distributed throughout the county with recreation trails and fishing waters nearby. The Mosquito Range west of Fairplay and Alma contains four peaks higher than 14,000 feet. Traversing this range is Mosquito Pass (13,186 feet), the highest motorized vehicle pass in North America. Numerous other mountain byways, jeep roads and OHV routes throughout the county provide self-guided auto tours through backcountry areas. Wildlife viewing is also a growing "sport" in Park County with over 1,200-square miles of public lands, 13 state wildlife areas, two state parks, and three natural areas. Interconnecting mountain bike trails between Kenosha Pass, Como, Alma, Fairplay, and Trout Creek Pass now provide over 150 miles of single and two-track riding for all abilities.

Commenter1:Emil McCain

Comment Excerpt Text:

Huerfano County is depressed economically, and our most valuable asset is our beautiful surroundings, clean air and water, recreational opportunities and dark skies. Tourists come here for these reasons, and I have seen that Huerfano County can be irrevocably damaged by the

industrialization that comes with oil and gas and mineral extraction. Inroads into roadless areas is irreversible.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In general, when looking at the economic implications of various management alternatives, BLM should do a full accounting of the costs and benefits. To facilitate informed investment decisions about publicly owned wildlands, economic analysis must take into consideration both market and nonmarket benefits and costs. Loomis, 1993.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should utilize a Total Economic Valuation Framework for evaluating alternatives.

To account for the full array of market and nonmarket wildland benefits, economists have derived the total economic valuation framework. Peterson and Sorg 1987; Morton 1999, 2000a. The total economic valuation framework (TEV) is the appropriate measure to use generally when evaluating alternatives developed for the RMP, and specifically for evaluating the benefits of conserving wilderness character.

All Americans own Federal public lands and the scope of the economic analysis should therefore look beyond the employment and income impacts on local communities to include all Americans. Taking a narrow "regional accounting stance" that only includes local counties will ignore the benefits and costs that accrue to Americans outside the region from management of public land.

While it is important to estimate local employment impacts, often the job gains of one community are offset by job losses in another community. There is no net gain to American society when allocation of public resources simply transfers economic activity from one location of the country to another. Loomis 1993. For example, drilling in Colorado will displace drilling activity elsewhere in America, and there would be no net loss or gain of jobs from a national perspective. Because public lands are owned by all Americans, we recommend the BLM take a national accounting stance when estimating the benefits and costs of management alternatives for the Eastern Colorado RMP.

To provide an analytic framework (see Figure 1) for such an analysis, economists have developed the total economic valuation concept that includes non-market benefits. Randall and Stoll 1983; Peterson and Sorg 1987; Loomis and Walsh 1992. Under this approach, non-market benefits of a primitive and wild landscape may be substantial. Morton 1999. Researchers have consistently

found that passive use benefits of wildlands, including the benefits of retaining the option to visit wilderness, simply knowing wilderness exists, and being able to pass it on to future generations (known to economists as option, existence, and bequest benefits), are greater than other wildland benefits. BLM planners must derive and fully utilize a total economic valuation framework when evaluating land management alternatives. It is the appropriate framework for evaluating management alternatives for public land.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should avoid IMPLAN or other input-output models that are grounded in Economic Base Theory when estimating jobs-income for each alternative.

The IMPLAN model is an economic model used by the Forest Service and the BLM to project jobs and income from proposed actions. While the IMPLAN model can be useful as a static analysis of the regional economy, communities must be aware of the shortcomings and poor track record of the model. A more accurate, dynamic, and complimentary approach examines regional trends in jobs and income. We recommend that BLM use the EPS model developed by, and available free from, the Sonoran Institute.

In general, models like IMPLAN are grounded in economic base theory. These models assume that an economy is static (i.e. it does not change) – which everyone knows is not true. IMPLAN models also do not consider the impacts of many important variables that affect regional growth in the rural west, such as regional amenities like high quality hunting, fishing and recreational opportunities, open space, scenic beauty, clean air and clean water, a sense of community, and our overall high quality of life. Many of these amenities are associated with attracting new migrants as well as retaining long-time residents.

Many long-time residents and new residents earn retirement and investment income. As shown by an analysis of economic trends, retirement and investment income is becoming increasingly important to rural economies of the west. A recent letter from 100 economists reinforces the importance of nonlabor income to the economy of the West. Whitelaw et al. 2003. Unfortunately, most IMPLAN models completely fail to consider the important economic role of retirement and investment in the economy of a community – which can be a fatal flaw of the model.

Our more specific concerns have to do with the technical assumptions used in most IMPLAN models. These questionable assumptions include: no changes in relative prices, no input substitution or technological change in the production processes; no labor mobility; no change in products or tastes; no regional migration; and no changes in state and local tax laws. The assumption of no labor mobility draws into question the issue of local versus non-local job creation, and this is particularly important when analyzing a proposal such as oil and gas development. There is no guarantee that the oil-gas jobs projected by IMPLAN will be filled by local workers. And with respect to oil and gas drilling, workers in non-local wildcat crews fill most, if not all the direct jobs.

Another major assumption with IMPLAN is the constant technology assumption. Most IMPLAN models, by failing to consider the downward impact of technology on job growth, will exaggerate the job potential from oil and gas drilling. As with other resource extractive industries attempting to maximize profits, technological improvements reduce labor costs and result in fewer jobs. In Northwest Colorado for example, companies now produce about twice the amount of coal with half as many workers. It is likely that current coal jobs are much less than originally forecasted by coal companies. The downward trend in resource extraction jobs only becomes apparent if the BLM completes a trend analysis of the change in jobs and income over time.

With respect to oil and gas, the constant technology assumption contradicts the fact that technological change occurs in the oil and gas industry. Investments in technology have resulted in fewer workers required for each well drilled. Computer technology has over time also reduced the number of workers required to produce natural gas and oil. The trends of technology replacing jobs in the oil and gas industry will continue. As a result of holding technology constant IMPLAN tends to overestimate future job gains associated with an increase in drilling and production of gas and oil (and coal). A review of government data confirms this.

Bureau of Labor Statistics (BLS) data indicate that in 1988, oil and gas drilling generated about 1.72 jobs per million dollars of spending. By 1998 that number fell to 1.44 jobs per million dollars. This indicates that the direct jobs estimated with a static model like IMPLAN model will be much less than the number actually created from drilling. As a result of this failure to account for technology improvements, inputoutput models are well known to predict higher multiplier effects than are actually experienced. Hoffman and Fortmann 1996.

In a review of 23 studies that empirically tested the economic base hypothesis, Krikelas (1991) found only four studies that provided any evidence in support of economic base theory as a

long run theory of economic growth -- a dismal track record. History is replete with cases of communities and areas that lost their export base and continued as reasonably successful economies with their social capital intact. The local-serving sectors of the economy were the persistent ones, as new exports were substituted for the old.

Even Tiebout (1956) recognized the shortcomings of the economic base theory when he wrote, "Without the ability to develop residentiary activities, the cost of development of export activities will be prohibitive." Krikelas (1992) concludes that economic base theory has severe limitations, especially for economic planning and policy analysis. This is a conclusion that community leaders and BLM officials and planners can no longer ignore, and one that should be incorporated into public land and community-level planning. As Haynes et al (1997) note: Where the economic base approach gets into trouble is when it is used inappropriately as a tool for planning or predicting impacts of greater than one year in duration; a snapshot of current conditions tells little about the form a region's future economy may take.

Economists with the Forest Service and Office of Technology Assessment concluded that while IMPLAN is useful for appraising the total economic impacts of a management plan, the model is insufficient for evaluating the economic impacts for communities. Hoekstra et. al, 1990; OTA 1992. According to the OTA (1992), IMPLAN has an additional shortcoming for assessing community impacts: the economic data used to construct IMPLAN do not provide comparable details for all resource-based sectors of the economy. While economic data for oil and gas is classified as a separate manufacturing industry, recreation is scattered among a variety of industries generally classified in services and retail, with some in transportation. The ease of data acquisition for estimating oil and gas impacts combined with the difficulty of estimating the impacts of recreation and tourism underscores the potential oil-gas bias in IMPLAN modeling.

The 25th anniversary issue of the Journal of Regional Science included an article by H.W. Richardson, a noted regional scientist, who believed that 40 years of research on economic base models "has done nothing to increase confidence in them". In addition, he concluded that it would be hard to "resist the conclusion that economic base models should be buried, and without prospects for resurrection." Richardson 1985. He is not alone. Many have suggested that economic base theories be abandoned in favor of other, more comprehensive theories of regional growth and development. Krikelas 1992; Rasker 1994; Power 1995 and 1996. Many of these economists recommend analysis of regional trend in total personal income as a better way to understand where the local economy came from and where it is headed.

The concern over the accuracy of regional growth models like IMPLAN combined with concern over the use of these models for planning, suggests that it is not only inappropriate but a disservice to rural communities to rely on IMPLAN to estimate the economic impacts of public land management alternatives on rural communities. If the BLM decides to use IMPLAN, we insist that the BLM shall fully discuss the assumptions, the shortcomings, and the poor track record of the model in planning efforts. At the same time the BLM must also complete a trend analysis of regional jobs and income – to provide a better and more complete understanding of their economic past and their economic future. We recommend the Economic Profile System that is available free from the Sonoran Institute.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should use Total Personal Income as a basis for examining economic impacts.

For the analysis of regional economic trends, BLM should include an analysis of all sources of income, rather than relying solely on employment – which will dramatically overstate the importance of oil and gas industries to the local economy. A full accounting of income is necessary to an understanding of the important role that transfer payments and other sources of non-labor income, such as interest payments, rents, and profits have upon the regional economy. For example, in Colorado in 2007, investment and retirement income accounts for 25% of total personal income in the state which makes its contribution to total personal income larger than the contribution from any single industry. Therefore, an economic impact analysis that excludes non-labor income is totally inadequate and misleading.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

To provide socio-economic context, BLM should examine historic trends in county income and employment.

A growing number of economists are recognizing that protecting the quality of the natural environment is key to attracting new residents and business and therefore the environment is the engine propelling the regional economy. A letter to President Bush from 100 economists (Whitelaw, et al. 2003) concludes “The West's natural environment is, arguably, its greatest, long-run economic strength…A community’s ability to retain and attract workers and firms now drives its prosperity. But if a community’s natural environment is degraded, it has greater difficult retaining and attracting workers and firms.” Given these findings, we request that the BLM economists fully consider the indirect role of wildlands (i.e. the "conservation alternative") in attracting non-recreational businesses and retirees when completing the economic impact analysis (including total personal income) of management alternatives.

Completing an analysis of income and employment trends and the role of wildlands in those trends is especially relevant given the growing body of literature suggesting that the future diversification of rural economies is dependent on the ecological and amenity services provided by public lands in the west. Power 1996; Rasker 1994; Haynes and Horne 1997; Rasker et al. 2004. These services (e.g. watershed protection, wildlife habitat, recreation opportunities, and scenic vistas) improve the quality of life, which in turn attracts new businesses and capital to rural communities.

Public lands in the west represent natural assets that provide communities with a comparative advantage over other rural areas in diversifying their economies. Public land management can contribute to decreasing dependence/specialization and diversifying local economies by de-emphasizing resource extraction and emphasizing management and budgets on providing high-quality recreation and conserving habitat for the regions biological resources.

As noted by Freudenburg and Gramling (1994): It needs to be recognized as a serious empirical possibility that the future economic hope for resource-dependent communities of...the United States could have less to do with the consumption of natural resources than with their preservation.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Value of Ecosystem Services

The importance of an analysis of the value of ecosystem services cannot be underestimated in the development of the Eastern Colorado RMP. Ecosystem services are those services provided by the ecosystem, seemingly for free. These ecosystem services include such tangible things as food, clean water, and carbon sequestering; but also include intangible services such as beauty, cultural heritage, and a place for solitude and quiet. Because it appears difficult to calculated the value of ecosystem services and because this variety of services has appeared to be free; their loss frequently does not get evaluated in the economic planning process for public lands. However it is critical to note that these services do have economic value, that value can be calculated, and the loss of those values can be significant.

Seemingly the loss of an ecosystem service would bring the value of that service to $0. However, the loss of a service actually brings the value of the service into a minus value, because if that service must be restored, then there is an actual cost to return the ecosystem to its previous functioning state. As an example, the pollution of the Rio Grande River by the mine at Summitville brings the value of clean water not to zero, but to the cost of building and maintaining the now necessary water treatment facility at the Summitville superfund site.

Unfortunately, while current economic models do not take these costs and losses into account, worse still are models based on GNP methodologies, that would see the cleanup or restoration based on the loss of an ecosystem as a positive value as the labor and materials needed for such cleanup or restoration would be goods and services that contribute to the Gross National Product. By extension, such a model would imply that ecosystem services should be destroyed in order to raise the value of the GNP.

In order to begin the process of establishing the value of ecosystem services Wild Connections has studied these services and published a report on them: Ecosystem Services: Their Economic Values and Place in Land Use Planning. Tadini Bacigalupi, Ph.D. 2010 (Attachment A.18). The report is divided into two sections, the first part focuses on current models used in public land use planning for the economic analysis of proposed actions, and finds serious flaws in those models, including IMPLAN.

The second part of the report focuses specifically on economic value of ecosystem services. This study finds that many economic services have been studied and their value can be determined through the use of peer reviewed articles. The study analyzed multiple articles conducted in many countries in order to reach a conclusion on the value of a particular ecosystem service and presents that result in 2008 dollars. It is important to note the economic value of ecosystem services is a dollar amount that is continuous, i.e. per acre per year. Additionally, in 2014 it was found that changes in the value of the dollar have added approximately 10% to the values presented in study.

Again because the value the value of ecosystem services has been difficult to ascertain in the past, public agencies have used qualitative analysis in order to obtain a picture of the socioeconomic value of a particular area. The problems with qualitative analysis used in this manner are many. Much is dependent on the number of people who make statements at the time of scoping, stand up at public meetings, perhaps answer questionnaires, and those who write comments on Draft Environmental Impact Statements. However, this information is limited and only gives a picture of how organized groups are in bringing out their supporters for a particular area of interest. The result of qualitative measurement is therefore limited.

As outlined above, the economic value of ecosystem services can be calculated. That value is ongoing each year into the future. The loss of ecosystem services can be great, and costly. Choices made in land use planning can immediately reduce or destroy the existent ecosystem services, or perhaps do the same at some point in the future. For these reasons the economic value of ecosystems services must be included in the analysis of social economic impacts and fully considered as recommendations are made for land use in the RMP.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Domestic oil and natural gas development is vital to Colorado's economy, providing $1.1 billion in revenues to the state and local governments that support roads, schools, public safety and other critical services. The oil and natural gas industry provides $29 billion in annual economic impact and supports 111,000 jobs ("Assessment Of Oil And Gas Industry Economic And Fiscal Impacts In Colorado In 2012" Business Research Division, CU Boulder – August 2013)

B.1.33.2. Socioeconomics and Environmental Justice - Impacts

Total Number of Comments: 53

Summary

Commenters noted various impacts on socioeconomics that should be analyzed in the EIS, including the following:

- impacts on roads, public facilities, and other public services
- impacts on natural sound qualities, dark and starry skies, water quality, and air quality and visibility in neighboring national parks
- impacts on communities, economies, and the taxbase due to changes in access to mineral resources; change in mineral resource management or withdrawal of minerals on federal mineral estate, including spit-estate lands, including the potential value of oil and natural gas sales; and royalty revenues, tax revenues, and wages generated by the increase or decrease in production under each alternative
- impacts of oil and gas development on adjacent private lands, including impacts on air and water quality
- impacts of resource development on area tourism
- economic impacts of special designations
- social cost of carbon
- impacts on beef supply chain, ranching, and agriculture, and associated impacts on migrant workers, Hispanics, and disadvantaged populations
- property value
- potential for interference with constitutionally protected private property rights and compliance with Executive Order 12630

All additional cost or benefits to local towns, communities, private landholders, agribusiness, ranching, and industry should be discussed. All identified differences between the existing RMP and proposed alternatives should be quantified. Guidance for analyzing environmental justice impacts was also provided.

See Section 2.3.1.21, Socioeconomics and Environmental Justice (p. 29)

Commenter1:Eddie Kockman

Comment Excerpt Text:

The study should address negative impacts to roads, public facilities and other public services that are the responsibility of Park County. Costs to fully mitigate these impacts should be defined. Impact fees from other Colorado Counties should be surveyed. For example Boulder County enacted a $20,000 per well impact fee to deal with road impacts.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Full-scale oil/gas production will impact private lands that are adjacent to BLM lands especially if water and air contamination occur. Should such impact occur what is the recourse for private lands that are affected?

Commenter1:Jeremy Winick

Comment Excerpt Text:

The tourist and recreation opportunities available by protecting these lands will provide greater long term economic benefit to Colorado and the local population than energy "development" that is short term and mostly benefits a relatively few non residents, but leaves the local population with the task of trying to mitigate the long term negative environmental effects.

Commenter1:Maria Albricka

Comment Excerpt Text:

As a tourist I certainly would not come to see roads, wells, industrialized areas, suburbs, strip malls and all the rest of the stuff that comes after the thin edge of development is driven into public lands. That kind of stuff is lamentably available in everyone's backyard.

Commenter1:Tim Canterbury

Comment Excerpt Text:

All uses have a direct impact on local economy and should be accounted for in this process. Setting aside lands under special designations does not manage the lands as they should have active management to address resource needs as we move forward in the future.

Commenter1:Michaela Weber

Comment Excerpt Text:

2) I enjoy the beauty it has to offer. It is also important to note the amount of rafting companies that are in this area, and how not preserving the area could negatively impact the attraction for customers.

Commenter1:Andrew Koransky

Comment Excerpt Text:

Grazing or mineral extraction does not improve our quality of life. I feel it scars the land, and generally does not improve our economy (except for the select few who are able to take advantage of grazing/mineral rights.) Thanks for the opportunity to comment.

Commenter1:Rob Dubin

Comment Excerpt Text:

As in any discussion I realize economics play a role-my feeling is that foot, horse and mountain bike trails, and healthy river rafting traffic allow great recreation and its economic benefits without the deleterious effects of mining, logging, or atv scars on the land. With that in mind I hope your future plans will emphasize those clean and low impact recreational and economic opportunities over uses that destroy the land in the process.

Commenter1:Brad Davis

Comment Excerpt Text:

I would also would ask that you consider the financial gain that could be opened if more trails were Available to the OHV community. The OHV community is the only community that actually pays to enjoy the trail systems. If Colorado were to be considered an OHV friendly community the trail systems I believe would receive a boost in revenue from in¬state residents and out of star tourists.

Commenter1:Kathy Peterman

Comment Excerpt Text:

The cost to the tax payers to survey each of these parcels would be huge. The possible sale price of these irregular pieces of undeveloped land may not even be worth the effort, even if everything else were equal.

Commenter1:Bret Williamson

Comment Excerpt Text:

Please understand that motorized recreation on public lands is a viable and sustainable activity and can also bring in monies to remote, small locales when they embrace the opportunity to open trail systems for recreational vehicles.

Commenter1:Elaine Scallan

Comment Excerpt Text:

When considering additional trails, especially OHV trails, I also ask that you assess the impact on property values for ranches, lands, and other private dwelling adjacent to BLM lands.

Commenter1:Nicholas Walter

Comment Excerpt Text:

As the BLM evaluates expansion of OHV access in Travel Management Areas, I think is essential that the BLM considers the impact on adjoining private landowners.

Commenter1:Nicholas Walter

Comment Excerpt Text:

I have no doubt that the economic value of my land would be markedly reduced by the nearby presence of an OHV trail.

This is supported by research that demonstrates that proximal OHV use on public lands diminishes adjoining private land values. [Ham C, Champ PA, Loomis JB, Reich RM. Accounting for heterogeneity of public lands in hedonic property models. Land Economics 2012;88:444-456.]

I therefore request that the Eastern Colorado Resource Management Plan take impacts of OHV use on adjoining private land into consideration during planning.

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

How can the impacts of proposed RMP changes in public land management actions, mineral lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanic; and disadvantaged populations can be clearly understood?

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

What quantitative benefits or impacts to communities, economies or the tax base will be realized if access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Decision?

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995 RMP, what additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching and industry?

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

Organization1:Center for Biological Diversity

Commenter1:Wendy Park

Organization2:Center for Biological Diversity

Commenter2:Taylor McKinnon

Organization3:Food & Water Watch

Commenter3:Sam Schabacker

Organization4:350 Colorado

Commenter4:Micah Parkin

Commenter5:John Fielder

Comment Excerpt Text:

new fossil fuel development will intensify climate disruption and its ecological and social consequences, which must be studied in the EIS. See p. 2 above. Although cost-benefit analysis is not necessarily the ideal or exclusive method for assessing contributions to an adverse effect as enormous, uncertain, and potentially catastrophic as climate change, BLM does have tools available to provide one approximation of external costs and has previously performed a "social cost of carbon" analysis in prior environmental reviews.21 Its own internal memo identifies one available analytical tool: "For federal agencies the authoritative estimates of [social cost of carbon] are provided by the 2013 technical report of the Interagency Working Group on Social Cost of Carbon, which was convened by the Council of Economic Advisers and the Office of Management and Budget."

Commenter1:David Moore

Comment Excerpt Text:

The communities of Gardner, La Veta, and Cuchara are vibrant and attractive to out¬ofstate folks, Talented folks move here permanently or have summer homes here. Why? The pleasant summer climate and beautiful wild, natural surroundings bring gifted persons. Many are professionals (many retired) who volunteer their talents to schools and community endeavors.

If this is true (I posit it is), the natural surroundings are key to maintaining this desirable social/natural environment.

Thus rulings by BLM on keeping areas natural without spoiling them is requested.

Commenter1:Douglas Walter

Comment Excerpt Text:

3. Allterrain vehicles, and their associated carrying equipment, are expensive. The BLM should take into account the fact that allowing allterrain vehicles would be disadvantaging those who do not have the resources to buy and maintain such vehicles and the equipment needed to transport them.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. Consistent with this order [EO12898, Enviro Justice], the EPA recommends the NEPA analysis for the Eastern Colorado RMP/EIS include the following:

Identification of any minority, low-income and tribal communities within the geographic scope of the impact area, including the sources of data and a description of the methodology and criteria utilized. The EPA recommends comparing census block group percentages (if available, or, at a minimum, census tract data) for below poverty and minority populations with the state average, and conducting the following steps if a block group percentage is greater than the state average. The EPA does not recommend use of higher thresholds.

A detailed assessment of environmental justice and other socioeconomic concerns for any environmental justice communities, to the extent information is available, including:

A discussion of the potential direct, indirect and cumulative environmental impacts of potential BLM-authorized RMP activities on the health of these communities, including air quality and water quality and quantity impacts.

An evaluation of the socio-economic impacts to the local communities, including the potential for any additional loading placed on local communities' abilities to provide necessary public services and amenities.

A determination of whether there may be disproportionately high and adverse impacts, including cumulative impacts, on the identified communities.

Mitigation measures to reduce any disproportionate adverse impacts. We recommend involving the affected communities in developing the measures. The EPA recognizes the need for early involvement of the local communities, and supports the meaningful participation of community representatives in the NEPA process.

Commenter1:Jessica Monson

Comment Excerpt Text:

Economic Impact. A commissioned study completed in 2013 valued the total economic impact of the 2012 Leadville Race Series to Lake County be just over $15M.

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

What quantitative benefits or impacts to communities, economies or the taxbase will be realized if access to mineral resources is increased, restricted or changed?

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995 RMP, what additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching and industry?

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

What direct or indirect effects to local communities, the taxbase, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

How can the impacts of proposed RMP changes in public land management actions, mineral lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to all segment so four area population can be clearly understood?

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

How can the impacts of proposed RMP changes in public land management actions, mineral lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

What will happen to communities, economies or the tax base if the access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Decision?

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

· What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of splitestate mineral leases and lands?

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

These and other NPS units are a significant source of the state's tourism and recreational economies. In 2014, Colorado parks received more than 6 million visitors, generated $552 million in economic benefit to the state's economy and produced 5,800 jobs.1 Land use practices outside of national park boundaries can dramatically affect the pristine conditions within parks that are important aspects of the visitor experience, causing impairments to: natural sound qualities, dark and starry skies, water quality, air quality and visibility. Air pollutants can also directly degrade cultural, historic and archaeological sites

Organization1:Outdoor Alliance Colorado

Commenter1:Julie Mach

Comment Excerpt Text:

The Importance of Recreation

The Outdoor Industry Association reports that outdoor recreation in Colorado generates over $10 billion annually in revenues to our state economy and supports 107,000 jobs. Activities like hiking, biking, climbing, camping, whitewater rafting, and kayaking are enjoyed by nearly 4 million people each year, helping to generate $500 million in state tax revenue. People from across Colorado and the country regularly visit the region to enjoy these activities, and protection is critical to ensure that they will remain open to outdoor recreational pursuits and to preserve Colorado's outdoor legacy for future generations.

Within the ECRMP there are a number of landscapes with high-quality outdoor recreation use and value. These landscapes offer users a chance to enjoy outdoor experiences, hone recreational and outdoor travel skills, spend time with friends and family, learn about public lands, and develop a stewardship ethic. Additionally, these recreational assets attract visitors from around the state to small, rural communities like Buena Vista, Salida and Canon City supporting numerous local businesses. As the population of Colorado is expected to double by 2050 (according to the Colorado Water Conservation Board) it is essential that the BLM anticipate the increased demand for recreation on lands within the ECRPM over the next 20-30 years. Through Recreation Management Area designations the BLM can proactively manage lands with high recreational values to ensure sustainable opportunities for users now and in the future.

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

What quantitative benefits or impacts to communities, economies or the tax base will be realized if access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Decision?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995

RMP, what additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching and industry?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

All identified cost-impact differentials or benefits)1 between the existing RMP and proposed alternatives must be quantified and reported as part of the EIS.

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

How can the impacts of proposed RMP changes in public land management actions, minerallease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

Commenter1:345219

Comment Excerpt Text:

Please consider how a trail or path that passes close to private property can have a major negative impact for that land owner. There is more litter, loud conversations, and trespassing issues.

I raise these concerns because of a number of trails in the South Platte Ranger District, such as Devil's Head Campground area, have become out of control with ATV, dirt bike riders, and irresponsible camping practices

Commenter1:Julie Sumpter

Comment Excerpt Text:

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995 RMP, what additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching and industry?

Commenter1:Julie Sumpter

Comment Excerpt Text:

All identified cost-impact differentials or benefit(s)' between the existing RMP and proposed alternatives must be quantified and reported as part of the EIS .

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

Commenter1:Julie Sumpter

Comment Excerpt Text:

What diminution or increase in adjacent, regional or private property values could result from the imposition of buffer zones, viewsheds, conservation easements, or heritage/cultural area restrictions?

Commenter1:Julie Sumpter

Comment Excerpt Text:

What procedures, methods or best practices will BLM incorporate into the NEPA/EIS process to evaluate the potential for interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decision-making?

How can the impacts of proposed RMP changes in public land management actions, mineral-lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Economic Costs: Roads and Subsequent OHV Use

Oil and gas exploration also requires roads that increase ecological costs and invite cross-country travel and habitat damage by OHVs. Oil and gas drilling often requires daily vehicular trips to monitor and maintain wells and pipelines. The increased traffic disrupts wildlife, may result in more road kill, and diminishes quality of life for local residents. The linear deforestation associated with road construction degrades habitat and fragments travel corridors needed by wildlife species. Roads become conduits for non-native species that displace native species resulting in significant mitigation costs for taxpayers. Roads, by providing access, increase the frequency of human-caused fires. Humans cause ninety percent of all wildfires in the national forests; more than half of those wildfires begin along roads. In addition roads increase the damage to historical, cultural and archeological resources due to increased ease of access. Roads increase sediment deposits in streams resulting in reductions in fish habitat productivity. In addition to keeping sediment from access roads and drill sites out of community water sources, roadless areas protect communities from mass wasting (e.g. landslides).

The economic costs from road construction for oil and gas drilling include increased OHV monitoring costs, increased frequency and costs of stream restoration projects, increased noxious weed mitigation costs, increased damage to archaeological sites and the decline in future benefits from visiting these sites, increased water treatment costs for downstream communities, and increased road maintenance and closure costs for taxpayers. The BLM must include a detailed analysis of these costs.

BLM also needs to analyze the costs of road maintenance and restoration and compare these costs with the budgets available to complete the work. For example, on average, the annual maintenance cost of a mile of Forest Service road is about $1,500 per mile. Each new mile of road added to the FS transportation system competes for limited road maintenance funding, as Congressional funding is less than 20% of the money necessary to maintain the existing road infrastructure. BLM faces similar problems and they must be accounted for in the plan.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Boom and Bust Cycles and the Socio-economic Costs to Communities

Oil and gas development is subject to cycles of boom and bust. The instability and lack of local control associated with oil and gas drilling are a source of both economic and social distress for communities that are too dependent on the oil and gas industry. Currently many communities in the Rocky Mountain region are experiencing the "boom." While there are benefits to the local communities, there are also costs. Landowners are incurring considerable expense to protect their homes, ranches and other property from the impacts of drilling on or near their lands. Local governments are experiencing increased costs to provide services to the expanding populations, along with increased costs due to increased traffic, crime, drug use, and demands on emergency services. Labor shifts also have costs to local communities. For example, workers may leave city or county jobs for oil and gas jobs, placing a strain on the government workforce at a time when agencies are stretched thin to handle the increased workload brought on by the boom (such a labor shift was documented in the Powder River Basin by Pederson Planning Consultants, 2001).

An historic emphasis on resource extraction industries has resulted in repetitious cycles of socioeconomic distress for rural communities. Limerick et al. 2002. This emphasis has inhibited the diversification of rural economies throughout the west. And the continued emphasis on export activities, if left unchallenged, will only insure future cycles of socio-economic distress in rural communities in the west, especially in isolated western communities. History is replete with cases of communities and areas that lost their export base in resource extraction, only to continue as reasonably successful economies with their social capital intact. In these examples, the local-serving sectors of the economy were the persistent ones, as new exports were substituted for the old. It becomes reasonable to ask: which are the important sectors of rural economies, the enduring or the transitory ones?

Past research has indicated significant social costs (e.g. employment that is only sporadic or seasonal, higher unemployment rates, etc.) associated with economic specialization and dependency on resource extractive industries. In essence, resource extractive communities have an inherent economic instability associated with them. This instability, in income and employment, for example, is a result of laborsaving technological improvements, business cycles sensitive to interest rates and housing starts, and fluctuations in world resource markets -- macroeconomic forces completely outside local control. The socio-economic risks to communities associated with boom and busts from oil and gas development should be addressed as part of the NEPA process.

Economic instability is of concern to community leaders because if a local economy is unstable, economic development plans are more likely to fail. The economic instability created in the "boom and bust" economies associated with resource extraction increases the risk for capital investment in linked industries. As such, resource specialization and the resulting economic instability can prevent the formation of forward and backward economic linkages in the local and regional economy.

There are other drawbacks to specialization in resource extractive employment. After examining the less desirable aspects of the wood products industry Fortmann et al. (1989) concluded: "Disincentives for stable employment, preferences for younger and cheaper labor that leave the less mobile and less trainable older worker out of work, cycles of market activity that carry with them high rates of unemployment, injury and illness rates and fatality rates that top all other employment categories are not attributes of a stabilizing industry, no matter how stability is defined."

Similar socio-economic trends are associated with oil and gas industries. Goldsmith 1992; Guilliford 1989; Smith 1986. These trends should be investigated as part of the NEPA analysis of proposed drilling.

Stevens (1978) found that resource extractive workers could gain more by changing jobs than by remaining with the same employer. The conclusion found by Stevens is partially a result of resource extractive workers being stuck in the vicious cycle of relatively high paying jobs with frequent layoffs and unemployment. This cycle is what Freudenburg (1992), a sociologist, calls the "intermittent positive reinforcement regime" -- which is one of the most effective of all behavioral reinforcements. Freudenburg and Gramling 1994.

Basically, resource extractive workers develop high skills that are not readily transferable to other jobs and they become overspecialized. Freudenburg and Gramling 1994. Investment in education and job retraining is low because "the potential return on their investment in their education is either too low or too uncertain to justify sacrifice. Humphrey et al. 1993. The resultant pattern of "rational underinvestment" in the development of skills and other forms of human capital can result in reduced economic competitiveness in resource-dependent and specialized communities. The socio-economic risks and costs associated with oil and gas development alternatives should be fully analyzed and discussed as part of the NEPA process involved with oil and gas development.

The boom-bust cycle has generated significant costs to communities in the Powder River Basin of Wyoming – costs that must be considered by public agencies promoting accelerated oil and gas development elsewhere. Many landowners are spending thousands of dollars on attorneys in order to negotiate surface damage agreements to protect their property (i.e. the split estate problem). Other landowners have seen dramatic declines in property values. The City of Gillette has experienced a 12 to 15 percent increase in truck traffic plus a 26 percent increase in traffic violations between 1999 and 2000. Pederson Planning Consultants 2001. As a result, the expected

life of city streets has decreased, while road operation and maintenance costs have increased. Dust from poorly constructed access roads causes health problems with horses, reduces the grass available for cattle, and negatively impacts air quality and visibility. County officials and residents are concerned that they will have to pay for clean up and restoration costs, as the bonds posted by CBM companies for plugging and abandoning a well are inadequate.

As a result of the coal-bed methane boom, Campbell County has seen an increase in larceny, traffic accidents, destruction of private property, family violence, and child abuse – resulting in the county spending money to add 36 cells to its existing jail. The fire department has seen a 40 percent increase in emergency calls between 1997 and 2000. Pederson Planning Consultants 2001. Similar trends have occurred in other counties in the Powder River Basin. There has also been a shift in the labor force. County workers have left for CBM jobs, resulting in instability in the labor force and making it more difficult to hire public workers (e.g. policemen, firemen) at a time where the counties and cities are stretched thin to handle the increased work load. The accelerated oil and gas development has left many counties and communities unable to pay for or finance the increase in public service costs. We have every reason to believe that similar costs and burdens will be placed on other communities where public and private land is threatened by oil and gas development. The socio-economic risks and costs associated with expedited oil and gas development must be fully accounted for as part of the NEPA process.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

The RMP/EIS must include an accurate and timely socio-economic analysis that takes into account the economic benefits of oil and natural gas development discussed above. This analysis should include the potential value of oil and natural gas sales, royalty revenues, tax revenues and wages generated by the increase or decrease in production that results from each alternative

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

What quantitative benefits or impacts to communities, economies or the tax base will be realized if access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Oecision?

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995 RMP, what additional cost implications or quantifiable benefits

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

What diminution or Increase in adjacent, regional or private property values could result from the imposition of buffer zones, viewsheds, conservation easements, or heritage/cultural area restrictions?

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

All identified cost-impact differentials or benefit(s)[11] between the existing RMP and proposed alternatives must be quantified and reported as part of the EIS.

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

It is conceivable that Conservation Easements taken on privately-owned surface land could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minera's beneath privately held lands?

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decision making?

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

How can the impacts of proposed RMP changes in public land management actions, mineral-lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

B.1.34. Hazardous Materials and Public Health and Safety

B.1.34.1. Hazardous Materials and Public Health and Safety - Impacts

Total Number of Comments: 9

Summary

Commenters noted existing and potential future hazardous in the planning area, including the following:

- hazardous materials associated with oil and gas activities, including hydraulic fracturing
- uranium exposure
- fire danger from OHV use
- High Altitude Mountain Environment Training operations

See Section 2.3.1.22, Hazardous Materials and Public Health and Safety (p. 30)

Commenter1:Alison Gannett

Comment Excerpt Text:

I am a farm that is affected by the toxic effects of public land fracking daily - our roads are congested with giant trucks, our air is full of benzene and other chemicals, we have almost two spills a day in Colorado, our tourism dollars and farm income is compromised, and our water is at threat daily.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Transportation of hazardous on state, county and private roads will occur in conjunction with oil/gas activities that may be permitted on federal lands. Effective enforcement of existing transportation laws and rules will be necessary and in cases this expanded level of enforcement may not be available at either the state, or county level. This issue must be addressed within a MLP.

Commenter1:345234

Comment Excerpt Text:

HAMET and their operations are my concerns. I live on Highway 9 in Guffey and have had these helicopters flying at a low altitude over our house, even after 9 p.m. Our property borders 31 mile

mountain BLM. It is my understanding that several of their landing sites (specifically 602, 603, 604, and 605) are in close proximity to us. A big concern is the possibility of a helicopter crash starting a forest fire next to us and our neighbors. Not hoping that would happen, but understand it's a possibility. What happens when a landing stampedes an elk herd through someone's land and someone's injured? We live in a remote area for peace and quiet and the ability to see wildlife from out home. HAMET is changing that, and I also fear for loss of property value.

Organization1:Tallahassee Area Community

Commenter1:Kay M. Hawklee

Comment Excerpt Text:

Our Community is concerned about an experimental uranium process that has no current State or Federal Statutes or Regulations to guide regulators. We are asking that BLM take note of the dangers of further exposure ; especially, in light of the attached document [CDPHE 2011].

Organization1:Tallahassee Area Community

Commenter1:Kay M. Hawklee

Comment Excerpt Text:

Our comment to BLM in regards to the proposed Resource Management Plan/Envirorunental Impact Statement is that any additional exposure to radioactivity could be detrimental to the Tallahassee area as evidenced by the attached report [CDPHE 2011].

Organization1:Tallahassee Area Community

Commenter1:Kay M. Hawklee

Comment Excerpt Text:

Cumulative impacts from any additional exposure pathways due to uranium releases into the envirorunent could impact area water wells (that homeowners rely upon as a sole source of water), the Tallahassee Creek system, and the Arkansas River. We ask that you take the details of this PA into consideration during your development of the Resource Management Plan and Envirorunental Impact Statement which could allow for fwther development of uranium resources in the Tallahassee Area

Commenter1:Lyn Lowry

Comment Excerpt Text:

. More and more studies show that fracking can pollute our waters, lands, air, public health, recreational opportunities, and tourist industries. Colorado's public lands should be preserved and protected for the enjoyment of the public, not handed over to exploitation by the oil and gas industry.

The only way to ensure the health and enjoyment of Colorado's public lands now and in the future is to reject fracking

Commenter1:Ruth Leuchte

Comment Excerpt Text:

The known health and safety hazards of fracking are mounting - opening these lands to fracking is not in the public's (our) best interest.

Commenter1:Heike Momiyama

Comment Excerpt Text:

i. OHV have a greater likelihood to create a fire danger. How will this be considered?

B.2. Planning Process

B.2.1. Planning 2.0

Total Number of Comments: 22

Summary

Commenters are generally supportive of using the BLM's Planning 2.0 approach and suggest including the following concepts in the planning process: monitoring and a monitoring plan, adaptive management and an adaptive management plan, appropriate scaling of allocations to those areas of the planning area that need decisions, public review and input on the draft alternatives before beginning impact analysis, landscape-level mitigation strategies and planning, measurable planning objectives, measurable and enforceable indicators and thresholds for analysis, and rapid ecoregional assessments and data as part of the baseline information and for analysis. Commenters provided specific step-by-step procedures that the BLM should follow when setting goals and objectives and creating adaptive management plans.

Organization1:Pew Charitable Trusts

Commenter1:Ken Rait

Comment Excerpt Text:

Recommendation: The Royal Gorge Field Office should continue to implement new BLM Planning 2.0 approaches throughout the entire planning process, proactively involving the public while improving BLM's management of the wild places meriting special protection.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Considering the geographic scale of the Eastern Colorado RMP revision, we feel that this plan is an ideal opportunity to incorporate elements of the BLM's Planning 2.0 initiative as an early adopter. Key concepts that could be incorporated in to the plan revision include:

Monitoring: The RMP revision should include a monitoring plan including past, current and future trends measured relative to desired resource conditions. Additionally, the plan should allow

for adaptive management if trends indicate that desired resource conditions are trending in an undesirable direction, including triggers for plan maintenance and/or amendments.

Planning at Multiple Scales: The BLM should scale the scope of decisions for Land Use Allocations to those portions of the field office for which decisions are necessary. For instance, unless the entire planning area has the potential for oil and gas development, there is no need for a leasing decision for the entire planning area. Instead, a leasing decision is only necessary for lands with oil and gas potential rating of "high" or "medium", or where there is a demonstrated industry interest. Lands with an oil and gas potential rating of "none" or "low" should be made unavailable for leasing unless industry has shown an interest in leasing, e.g. expression of interest. Planning can then be further scaled-down for lands that are well-suited for a Master Leasing Plan, thereby focusing planning resources on the areas of greatest need.

Review of Preliminary Management Alternatives: One of the goals of Planning 2.0 is to provide additional opportunities for collaborative planning with the public. This could be facilitated by providing the public an opportunity to review the preliminary management alternatives; to be most helpful, this would need to occur between the end of scoping and the publication of the draft EIS. This would serve as an additional opportunity for public input to engage with planners and help the BLM further refine draft alternatives before finalizing the draft plan/EIS.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

adopting BLM Planning 2.0 principles in this plan amendment will improve how lands and resources are managed within the Field Office's jurisdiction. In particular, we support the Bureau's expressed interest in planning across landscapes and making decisions "at the scale relevant to the resources." As resources become scarcer and long-term degradation of resources becomes more evident, the BLM should use this opportunity to affirmatively plan and manage for wildlife conservation, ecosystem function, and other resources and values on public lands, consistent with Federal Land Policy and Management Act's (FLMPA) direction that "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values" (43 U.S.C. § 1701(a)(8)).

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Eastern Colorado RMP should adopt a landscape approach to planning that places conservation and management decisions within a broader ecological context (regardless of land ownership) for the purposes of improving ecological outcomes. The Royal Gorge Field Office has an excellent opportunity to coordinate with the Pike-San Isabel National Forest on developing habitat connectivity for species such as the lynx and Mexican spotted owl, and the AMS lists potential government agency collaborators (Eastern Colorado AMS 2015 at 371).

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

At minimum, the Eastern Colorado RMP should provide a framework for incorporating landscape mitigation planning assessments into preplanning and the AMS compatible with Planning 2.0. In order to do this, the planning process needs to identify priority areas, including connectivity areas, along with defining conservation management direction for those areas. It is also important to note that a landscape approach is not simply zoning high and low-priority conservation areas. Although identifying essential habitat areas is important, the combination of all management areas, plus the management direction within the various areas, must result in improved conservation for special status species. It is important that the DEIS acknowledge these effects in its analysis.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

A successful landscape approach will result in the exclusion or reduction of incompatible uses in places of high ecological value within the planning area for Special Status Species (BLM 6840 Manual) and Fish and Wildlife (BLM 6500 Manual). These lands should be identified, designated (as appropriate) and managed to ensure that they are not later utilized in ways that undermine the conservation goals and objectives in the RMP. The BLM has authority in existing law and policy to provide durable protection for lands and resources identified for conservation purposes and for necessary compensatory mitigation, including granting conservation rights-of-way, and easements, and withdrawing lands from incompatible lands uses to achieve conservation goals under the Federal Land Policy and Management Act.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

Going forward, NPCA urges BLM to maintain close and consistent collaboration with NPS as well as other public stakeholders throughout the planning process. In particular, we encourage BLM to exercise every effort to make data and analysis related to the planning effort available for review and comment by its agency partners and the public on a timely and regular basis, notably prior to the development of planning alternatives. In the long run, regular sharing of information informing alternatives will result in a more efficient process and defensible product.

Commenter1:Deb Overn

Comment Excerpt Text:

Many small decisions that are fine on a site-by-site basis can have devastating effect cumulatively. In addition, all long-term plans and responsible landowners must consider the impact climate change will have over the next decades. Landscape-scale planning is one of the best ways to do this. For example, lands that of themselves may appear unremarkable may be vital corridors connecting high-value areas

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

FLPMA mandates that BLM manage for "multiple use," meaning, in part, the "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." 43 U.S.C. § 1702(c). Additionally, BLM must abide by principles of "sustained yield," which means "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use." Id. at § 1702(h). BLM cannot meet these obligations without first knowing how much of the landscape can and should be allocated at this time. Thus, it is crucial that the carrying capacity of the landscape as well as conservation and restoration of important and imperiled public lands and resources are planned for prior to allocating the planning area for multiple uses.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The following is a suggested step-by-step approach for the Eastern Colorado RMP, incorporating modern concepts of landscape level planning that seeks to help BLM meet its most fundamental obligations of managing for multiple use and sustained yield.

Step 1: Assessment: Landscape-scale analysis of the carrying capacity of the area.

The first step involves a baseline analysis of the carrying capacity of the landscape that encompasses the planning area. This should include, but is not limited to areas of high conservation value, intactness, restoration potential, fish and wildlife populations, high value habitats, lack of development or roads, and dense cultural resources, in addition to areas that cannot be restored or where uses or public access is prohibited. This analysis should also contain the current distribution of resource uses in the landscape including recreation areas, oil and gas leasing, mining claims, grazing allotments, roads, renewable energy development or zones, and transmission lines. This essential and foundational analysis is consistent with NEPA's requirement that the agency "describe the environment of the areas to be affected or created by the alternatives under consideration." 40 C.F.R. § 1502.15.

An example is the West Chocolate Mountains Renewable Energy Evaluation Area (REEA), a solar energy zone near Niland, California. The final EIS stated the importance of "first identifying the existing resources associated with the land in the West Chocolate Mountains REEA and then making appropriate land use plan decisions regarding the location, development, and management of those resources." The West Chocolate Mountains REEA emphasizes early, broad planning to identify existing resources before making land use decisions with the goal of avoiding resource conflicts and adding predictability to the renewable energy development process.

BLM could benefit greatly by involving the public in this analysis stage from the very beginning of planning. For example, BLM could make data calls to the public and institutions to help with collection of data and inventory information where there are gaps. If done during the early stages of planning, BLM could better anticipate concerns and management issues that may come up during scoping and will be in a better position to address those issues throughout the process.

Step 2: Set priority areas for conservation and restoration based on the analysis in Step 1

This step takes the landscape analysis required in Step 1 and prioritizes certain areas for conservation and restoration purposes based on certain criteria, including, but not limited to: ecological integrity (content, structure and processes of the ecosystem are intact); wilderness values; connectivity; areas important for climate adaptation; wildlife habitat; restoration potential; cultural resources; and scenic viewsheds. These priority areas are in addition to other designations as established by Congress or the president as well as areas of critical environmental concern as required by FLPMA and eligible and suitable wild and scenic rivers as required by the Wild and Scenic Rivers Act. Establishing priority areas for conservation and restoration will help to ensure that resources are managed "without permanent impairment of the productivity of the land and the quality of the environment" and that BLM is fulfilling its mandate to maintain sustained yield of resources consistent with multiple use, as required by FLPMA. 43 U.S.C. § 1702.

An example is the Sonoran Desert Conservation Plan of Pima County, Arizona. Pima County developed a plan in the late 1990s for balancing conservation and protection that considered five elements: critical habitats and biological corridors, riparian areas, mountain parks, historical and cultural preservation, and ranch conservation. All five elements, along with fiscal analysis, formed Pima County's landscape level land management plan.

A second example is the Western Solar Plan. In this case, BLM set aside specific categories of land that would be excluded from utility-scale solar energy development after reviewing "solar energy zones" that have relatively few environmental or other conflicts, access to transmission, and other features that make them particularly suitable for solar project development.

Step 3: Divide the landscape into Restoration, Innovation and Observation Zones

Once BLM has decided what the lay of the landscape is, in terms of carrying capacity and conservation and restoration potential, it can go on to designate appropriate zones to facilitate climate change adaptation. A true plan for climate adaptation requires applying knowledge and foresight gained from a "learn as you go" approach, rather than general statements that BLM will plan to "be adaptive." As the Northwest Forest Plan in 1993 explained, "Managing as an experiment or managing 'to learn' entails implementing an array of practices, then taking a scientific approach in describing anticipated outcomes of those practices and comparing them to actual monitored outcomes . . . it diversifies management practices, so that at least some of the alternatives produce desired results, rather than putting all of the ecosystem eggs in one basket." Northwest Forest Plan at VIII-21–22.

Our recommended experimental, adaptive design is an essential component to the "portfolio approach" of management strategies in land use plans, recently proposed in The Pinchot Letter. Belote et al. 2014. Belote et al. conclude that land managers should use an experimental zoning approach for managing certain lands that include the following zones as management strategies: (1) Restoration Zones that are devoted to forestalling change through the process of ecological restoration; (2) Innovation Zones that are devoted to innovative management that anticipates climate change and guides ecological change to prepare for it; and (3) Observation Zones that

are left to change on their own time to serve as scientific "controls" and to hedge against the unintended consequences of active management elsewhere. These strategies should be used in conjunction with each other in order to spread the risk among the different strategies and to allow for diverse outcomes to inform rapid learning about management strategies in the future.

The following publications contain examples of how a portfolio approach to climate adaptation could be applied:

Aplet, G.; Gallo, J. 2012. Applying climate adaptation concepts to the landscape scale: examples from the Sierra and Stanislaus National Forests. Available at: http://wilderness.org/sites/default/files/Sierra_and_Stanislaus_climate_adaptation.pdf

Tabor, G.M.; Carlson, A.; Belote, T. Challenges and Opportunities for Large Landscape-Scale Management in a Shifting Climate: The Importance of Nested Adaptation Responses Across Geospatial and Temporal Scales. USDA Forest Service RMRS-P-71. 2014. Available at: http://www.fs.fed.us/rm/pubs/rmrs_p071/rmrs_p071_205_227.pdf

Step 4: Evaluate the potential for distribution of the resource uses in the landscape

The fourth step is an analysis of the potential distribution of the resource uses in the landscape. These uses include, but are not limited to recreation, oil and gas development, mining, grazing, transportation, renewable energy development, and utility transmission lines. An understanding of what is already being distributed to resource uses in the landscape will provide a better understanding of how resource uses might be allocated within the planning area among the priority areas for conservation and restoration as well as the actual carrying capacity of the area.

The Draft Desert Renewable Energy Conservation Plan (DRECP) in California provides an example of BLM first identifying suitable areas in the Mojave Desert for biological, cultural and wilderness conservation as well as recreation management areas. Then, BLM is proposing "development focus areas" (DFAs) where renewable energy approval would be streamlined. The evaluation of the potential for DFAs is supposed to lead to more certainty for the timely development of resources and less impacts to the other resources in the landscape.

Step 5: Allocate resource uses for the planning area appropriately

Once BLM has followed all of the steps to evaluate carrying capacity, allocate and designate priority conservation and restoration areas and potential for resource uses at the landscape level, then BLM should go on to decide how the resource uses should be distributed under the multiple use and sustained yield mandate of FLPMA. This step pertains only to the planning area itself but only after considerations of conservation, restoration and resource uses are taken into account from the broader landscape-scale evaluations and allocations. This will ensure that BLM is "making the most judicious use of the land for some or all of these resources or related services," as required by FLPMA. 43 U.S.C. § 1702(c).

Step 6: Set triggers for RMP amendments

This final step requires BLM to set certain indicators and thresholds of change that inform the point in time in which an amendment should be prepared or mitigation should be undertaken. BLM should develop appropriate indicators and thresholds for change during planning by incorporating its Assessment, Inventory and Monitoring (AIM) Strategy into its planning process. This will assist in achieving one of BLM's stated goals for Planning 2.0, to "create a dynamic and durable planning process that is responsive to change, making it more efficient to keep plans

current through amendments." Triggers do not need to be a single red line that must not be crossed; triggers can be a continuum used to prevent the crossing of ecological and regulatory thresholds. Nie, Martin A. & Schultz, Courtney A. 2012. The key is proactively identifying specific, measurable triggers that can be enforced, and then incorporating them into the governing management document.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The Eastern Colorado RMP should adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e. fish and wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations. This recommendation is strongly echoed by the Western Governors' Association's Wildlife Corridor Initiative.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Through Planning 2.0, BLM is looking to make planning more adaptive and efficient in order to better respond to challenges in the face of uncertainty. We support this goal. Ultimately, BLM can make gains in adaptive management and efficiency by building more opportunity for change and input into the RMP up front.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

1. Set specific, measurable and enforceable indicators and thresholds for when an RMP needs adjustment.

As recommended in the section above, BLM should set indicators and thresholds for change in RMPs that describe and analyze when an RMP should be adjusted. This will not only create more dynamic and adaptable management plans, but also help create more efficiency in future adjustments to management plans since the agency should be allowed to tier to the analysis already completed. To be meaningful, these triggers should be specific, measurable and enforceable for when a change in management may be necessary.

Triggers do not need to be a single red line that must not be crossed; instead, triggers can be a continuum used to prevent the crossing of ecological and regulatory thresholds. Ibid. The key is pre-negotiating specific, measurable triggers that can be enforced. Two particular cases provide valuable guidance for designing suitable adaptive management plans for operation of water projects on the Sacramento and San Joaquin Rivers. NRDC v. Kempthorne 506 F. Supp. 2d 322 (E.D. Cal 2007); Pac. Coast Fed'n of Fishermen's Ass'n v. Gutierrez, 606 F. Supp. 2d 1122 (E.D. Cal. 2008).

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Recommendations: The following is a proposed framework for an adaptive management strategy. The agency should provide all of the following components in the RMP in order to make the adaptive management plan meaningful and enforceable:

- Set specific management goals and objectives, such as biological goals and objectives to show the targeted management.
- Identify potential threats to management goals and objectives as well as potential stressors to the system.
- Set specific, enforceable and measurable indicators to gauge progress towards goals with timelines for implementation. Adjust management as appropriate when triggers are hit.
- Develop a monitoring plan with monitoring protocols, timelines for completing monitoring, and reports on the findings and conclusions.
- Provide a range of alternative management scenarios as well as a comprehensive process for additional consultation on adaptive management options when triggers are hit.
- Provide for public input, including providing information during data collection, setting triggers, and when change might be necessary to respond to triggers being hit or other unforeseeable factors.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Release of preliminary management alternatives: Many issues and inefficiencies can be resolved by more transparency and opportunity for public participation as soon as possible. BLM has in isolated instances provided preliminary management alternatives for public review and comment, such as in the Las Cruces District Office and more recently the San Pedro Riparian National Conservation Area. The release of preliminary management alternatives is typically accompanied by public meetings and a comment period. In addition to providing public input into the management situation analysis and identification of planning issues, BLM should release a preliminary range of alternatives prior to preparing draft RMPs. This would increase flexibility and effectiveness, as well as improve data use and information gathering, by allowing BLM to refine its approach based on input at this level of the planning process.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The RMP should be analyzing and making management decisions across the Royal Gorge Field Office as an integrated landscape, and even looking beyond the planning area boundaries to the contextual landscape in which management decisions will play out. In particular, BLM should be cognizant of the resource values and management designations of other public lands, such as National Forests and state lands, which are adjacent of contiguous to BLM parcels, as these may mutually influence conditions at the landscape scale. Segmenting the planning area into smaller planning units would be directly contrary to the principles and purpose of Planning 2.0 and landscape level planning.

Recommendations: BLM should address the planning area as an integrated landscape in the Eastern Colorado RMP, and not segment the planning area into smaller planning units.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Public engagement and transparency: Beyond envisioning and scoping meetings, there are a number of ways that BLM can continue to inform the public of planning developments and issues potentially effecting the RMP revision. Public forums (both in-person and remotely) at all stages of planning will help ensure stakeholders are up-to-date and able to provide notable input, rather than limiting BLM's public outreach to official comment periods. BLM should use Planning 2.0's emphasis on public participation to increase transparency in the planning process.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Planning 2.0 seeks to develop a landscape-level approach to planning, and this concept should be a priority in the Eastern Colorado RMP.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should consult with the Southern Rockies and Great Plains Landscape Conservation Cooperatives (LCC) to help provide additional information at the landscape level. LCCs were specifically formed to provide land managers with applied science and decision support tools for this very purpose.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Estimation of Effects of Alternatives [43 CFR 1610.4-6]

Use of REA/LA data provides an excellent opportunity for the agency to examine how the data can be integrated (i.e. layered in a geographic information system) on multiple geospatial scales over the planning area and to identify model parameters to assess and forecast outcomes that may result from different management strategies or potential trends in, for instance, predicted climate change or wildfire effects on specific resources.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Formulation of Alternatives [43 CFR 1610.4-5]

One of the most important opportunities to make use of the information provided through REA/[Landscape Assessments] is in the formulation of resource management alternatives for analysis through the planning and National Environmental Policy Act (NEPA) process. As described above, the REA/LA provide detailed information on conditions and trends across multiple geospatial levels over broad landscape geographies. Based on the assessment results, goals and clear objectives can be developed for specific resources and programs that reflect resource issues, opportunities and challenges and articulate the agency's desired outcomes for sustainable resource use, conservation, protection, and/or restoration. In addition, the REA/LA data can be used to formulate planning alternatives that address the BLM's landscape objectives and goals.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Like other sources of information available to the BLM, REA/LA data, with its emphasis on certain change agents and management questions, can inform effects modeling of a wide range of management methods. These management methods can range from passive management to more active management techniques such as vegetation treatments and manipulations to meet resource objectives. They can also include applying management strategies with varying levels of intensity for resource programs such as livestock grazing, wild horses and burros, wildlife management, recreation, travel and transportation, energy development, forestry, and other land uses. Use of REA/LA data can inform a robust analysis of the cumulative effects of alternatives thus providing the agency and the public a nuanced picture on the relative success of different resource management strategies in the project or planning area and the larger landscape.

B.2.2. Planning Criteria

Total Number of Comments: 6

Summary

The BLM should develop appropriate matrices to compare and jointly evaluate the impact of alternatives.

The BLM should incorporate ecosystem management and the conservation of native biodiversity to reduce the likelihood that any native species will require BLM sensitive species status as a planning criteria, as discussed in BLM 6840 Manual .2C7.

The 1995 RMP and 1996 Record of Decision should be the baseline documents to which all alternatives should be compared. Any new planning criteria or planning issues contemplated beyond the 1995 RMP represents a scope change from existing agency policy and, therefore, should be separately called out and screened, and their impacts or benefits specifically evaluated in the EIS process using planning criteria.

The BLM should evaluate these planning issues in the RMP:

What quantitative benefits or impacts on communities, economies, or the tax base will be realized if access to mineral resources is increased, restricted, or changed from the baseline 1995 RMP and Record of Decision?

If environmental mitigation, management actions, BMPs, adaptive management, or other requirements are imposed on BLM-administered lands beyond the approved 1995 RMP, what

additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching, and industry?

All identified cost-impact differentials or benefits between the current RMP and proposed alternatives must be quantified and reported in the EIS.

What direct or indirect effects on local communities, the tax base, culture, and/or customs could result from withdrawal and changes in management of split-estate mineral leases and lands?

It is conceivable that conservation easements taken on privately owned surface land could inhibit access to public minerals beneath those lands. What specific measures will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

What diminution or increase in adjacent, regional, or private property values could result from the imposition of buffer zones, viewsheds, conservation easements, or heritage/cultural area restrictions?

What procedures, methods, or best practices will BLM incorporate into the EIS to evaluate the potential for interference with constitutionally protected private property rights and ensure compliance with Executive Order 12630?

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives, such that competing human and environmental decisions can be effectively balanced during decision making?

How can the impacts of proposed RMP changes in BLM-administered land management actions, mineral lease modifications, and/or new environmental restrictions be effectively evaluated such that the changes to beef-supply chain, ranching, and agriculture, and the associated impacts on migrant workers, Hispanics, and disadvantaged populations can be clearly understood?

The revised RMP should include permit and application review time constraints specifying that, in the event of BLM inaction, access to public resources is automatically granted.

A commenter proposed the following planning criteria for inclusion in the RMP:

a) Executive Order 12630 – Governmental Actions and Interference with Constitutionally Protected Property Rights

b) Executive Order 12866 – Regulatory Planning and Review

c) Executive Orders 12898 and 12250 – Environmental Justice and Minority Populations

d) 2 US Code Section 1501: Unfunded Mandates Act

e) Section 515 of the Consolidated Appropriations Act, 2001 – -Data Quality Act

f) Executive Order 13352 – Facilitation of Cooperative Conservation

g) Executive Orders 12372 and 13575 – Intergovernmental Coordination with State and Local Governments

White House Rural Council

h) 5 US Code Sections 601-612 Regulatory Flexibility Act

i) Executive Order 12291 – Agency Accountability; Duplication Assessment; Cost/Benefit Analysis

j) 40 CFR Section 1508.8 – Effects

k) 40 CFR Section 1508.27(7) – Evaluation of Significant and Cumulative Effects of Actions on Human Environments

1) 43 CFR Section 1610 – Resource Management Planning

1610.3-1 Coordination

1610.3-2 Consistency Requirements

1610.4-1 Identification of Issues

1610.4-2 Development of Planning Criteria

1610.4-3 Inventory Data and Information

1610.4-4 Analysis of Management Situations

1610.4-5 Formulation of Alternatives

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing luman and environmental decisions can be effectively balanced during decisionmaking?

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

Importantly, this same section in the Manual elevates the importance of "ecosystem management and the conservation of native biodiversity to reduce the likelihood that any native species will require Bureau sensitive species status" (BLM 6840 Manual .2C7). This too should be used as a criterion for evaluating plan alternatives in the DEIS.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decisionmaking?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decision making?

Organization1:Southeastern Colorado Private Property Rights Council SECPPRC

Commenter1:Dianna Tixier

Comment Excerpt Text:

SECPPRC is providing Planning Criteria and Planning Issues for inclusion in the Scoping and EIS Process. As we know BLM understands, Planning Criteria are Statutes, Standards, Rules and Measures that guide the selection of alternatives for the RMP process for their part, Planning Issues are those items that could result in public land use conflicts, problems or opportunities, and identification of those issues early can avoid conflicts later in the process. We have also included procedural recommendations to streamline the planning, technical-review and permitting process.

For purposes of the RMP revision, we view the January 1995 Resource Management Plan191 and May, 1996 administrative Record of Decision as the Baseline documents from which all alternative(s) are to be assessed, issues gauged, and changes are to be weighed, evaluated and quantified. Any new planning criteria or planning issues contemplated by BLM beyond the 1995 RMP represents a scope change from existing agency policy and therefore must be separately called out and screened, and their impacts or benefits specifically evaluated in the NEP A EIS process using planning criteria.

We have identified planning issues and criteria for inclusion in the RMP process. Because these planning issues and criteria are based upon referenced NEPA statutes, CEQ Regulations, Executive Orders and land-use plans, any differences or conflicts with existing administrative policy must be resolved through review and realignment with the NEPA and FLPMA congressional mandates and codified Executive intent.

As Land Owners and Constituents of our local government having parity with BLM during the NEPA process, we are open to supporting those reviews as the need may arise.

Planning Issues for RMP Process -

What quantitative benefits or impacts to communities, economies or the tax base will be realized if access to mineral resources is increased, restricted or changed from the Baseline 1995 RMP and Record of Decision?

If environmental mitigation, management actions, best management practices, adaptive management or other requirements are imposed on public lands beyond the approved 1995 RMP, what additional cost implications or quantifiable benefits may be expected to local towns, communities, private landholders, agribusiness, ranching and industry?

All identified cost-impact differentials or benefit(s [ll] between the existing RMP and proposed alternatives must be quantified and reported as part of the EIS.

What direct or indirect effects to local communities, the tax base, culture and/or customs could result from withdrawal, changes in management of split-estate mineral leases and lands?

It is conceivable that Conservation Easements taken It is conceivable that Conservation Easements taken on privately-owned surface land could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

What diminution or increase in adjacent, regional or private property values could result from the imposition of buffer zones, view-sheds, conservation easements, or heritage/cultural area restrictions?

What procedures, methods or best practices will BLM incorporate into the NEPAIEIS process to evaluate the potential for interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decision making?

How can the impacts of proposed RMP changes in public land management actions, mineral-lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef= supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

We believe the revised RMP should include Permit and Application review time constraints specil)'ing in the event of Agency inaction, access to public resources is automatically granted.

on privately-owned surface land could inhibit access to public minerals beneath those lands. What specific safeguards will be incorporated into the RMP to encourage and safeguard future access to public minerals beneath privately held lands?

What diminution or increase in adjacent, regional or private property values could result from the imposition of buffer zones, viewsheds, conservation easements, or heritage/cultural area restrictions?

What procedures, methods or best practices will BLM incorporate into the NEPA/EIS process to evaluate the potential for interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

What matrices are in place or will be developed to compare and jointly evaluate the impact of alternatives such that competing human and environmental decisions can be effectively balanced during decision-making?

How can the impacts of proposed RMP changes in public land management actions, mineral-lease modifications and/or new environmental restrictions be effectively evaluated such that the changes to beef supply chain, ranching, agriculture and associated impacts to migrant workers, Hispanics and disadvantaged populations can be clearly understood?

We believe the revised RMP should include Permit and Application review time constraints specil)'ing in the event of Agency inaction, access to public resources is automatically granted.

Organization1:Southeastern Colorado Private Property Rights Council SECPPRC

Commenter1:Dianna Tixier

Comment Excerpt Text:

Planning Criteria for Inclusion in the RMP process:

Specific, appropriate planning criteria we would like to see incorporated throughout the EIS, and alternative-generation process include:

a) EO 12630 - Governmental Actions and Interference with Constitutionally Protected Property Rights;

b) EO 12866 -Regulatory Planning and Review;

c) EOs 12898 and 12250 -Environmental Justice and Minority Populations;

d) 2 USC §1501: Unfunded Mandates Act;

e) Section 515 of the Consolidated Appropriations Act, 2001 -Data Quality Act;

f) EO 13352- Facilitation of Cooperative Conservation;

g) EOs 12372 and 13575 - Intergovernmental Coordination with State and Local Governments;

White House Rural Council;

h) 5 USC§§ 601-612 Regulatory Flexibility Act;

i) EO 12291 -Agency Accountability; Duplication Assessment; Cost/Benefit Analysis;

j) 40 CFR §1508.8- Effects;

k) 40 CFR §1508.27(7)- Evaluation of Significant and Cumulative Effects of Actions on Human Environments;

1) 43 CFR §1610- Resource Management Planning

161 0.3-1 Coordination

161 0.3-2 Consistency Requirements

1610.4-1 Identification of Issues

1610.4-2 Development of Planning Criteria

1610.4-3 Inventory Data and Information

161 0.4-4 Analysis of Management Situations

1610.4-5 Formulation of Alternatives

Fundamental Doctrines and Superseding National Policy:

Doctrine of Multiple Use

42 USC §4331(a) - "To create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans."

42 USC §4331(b)- "To use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate federal plans, functions and programs, and resources to the end the nation may- (5) achieve balance between population and resource use which permit high standards of living and a wide sharing of life's amenities."

We must make certain the Planning Criteria are addressed during the land-use plan review and EIS process

B.2.3. Scoping Process

Total Number of Comments: 5

Summary

The BLM should release a separate report on the pre-scoping "envisioning" meetings that summarizes and communicates the big-picture vision for the planning area as articulated by participants in that process.

Commenter1:Kevin Bradley

Comment Excerpt Text:

I lack a detailed knowledge of how the BLM manages the areas under its control though I am familiar with it in broad sense. The first objective should be to address that. Publicizing and communicating their efforts is critical, second only to an ongoing and flexible plan to determine what are the resources contained within its jurisdiction and how they may best be utilized and/or protected.

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

Use several methods of communication, not just the Internet. Rural areas have limited Internet access and not all older people have the skills to access the needed information.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

Use several methods of communication, not just the Internet. Please know that rural areas have limited Internet access and not all older people have the skills to access the needed information. Plus, there are very few choices for internet companies and their service is minimal.

Commenter1:Julie Sumpter

Comment Excerpt Text:

Use several methods of communication, not just the Internet. Please know that rural areas have limited Internet access and not all older people have the skills to access the needed information.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Pre-scoping public involvement: We support the "envisioning" meetings that took place across the Eastern Colorado RMP planning area as a way to get the public engaged early and often and conceptualize landscape-level goals for the RMP. During the pre-scoping period, open forums are an appropriate, effective, and highly visible way for BLM to engage the public on the range of planning issues. We also support BLM releasing a separate report for the envisioning meetings that summarizes and communicates to the public what the big picture vision is for the planning area based on what communities articulated in the envisioning process.

B.2.4. Consistency with State, Local, and Tribal Plans and Policies

Total Number of Comments: 18

Summary

Commenters provided information on local, county, and state policies and plans. The plans noted included:

- integration of state agency management goals
- incorporation of state wildlife units in the analysis
- Colorado Department of Public Health and Environment new rules governing air quality emissions
- Lake County Open Space Initiative's ecosystem management plan
- the Top of the Rockies Scenic Byway and Collegiate Peaks Scenic Byway plans
- Park County regulations, zoning laws, and policies
- Land Trust of the Upper Arkansas-owned lands and/or conservation easements
- Huerfano County Comprehensive Plan of 2010
- all individual county planning documents
- the proposed 64-mile long hiking, biking, horseback, and sometimes driving trail from Salida to Leadville (a joint draft planning effort with Colorado Department of Transportation, Colorado Parks and Wildlife, and Greater Arkansas River Nature Association)

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

In setting new management direction for elk habitat in BLM Land Use Plans or establishing watershed management objectives or project design features, we strongly encourage integration of state agency management goals for elk and close coordination with respective state agency wildlife biologists.

Organization1:Rocky Mountain Elk Foundation

Commenter1:Toni O'Hara

Comment Excerpt Text:

State wildlife agencies gather wildlife population trend data based on their designated management units. From a data sharing and comparability perspective, where possible, it would be beneficial for BLM to incorporate these defined "units" in resource planning and monitoring to determine if management actions are achieving desired future conditions and resource management objectives.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Colorado Department of Public Health and Environment have recently enacted new rules governing air quality emissions from oil/gas production facilities and may be considering more actions in the future. A MLP should address these rules.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

consult Lake County Open Space Initiative's ecosystem management plan when making plans for BLM lands in Lake County

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

BLM also should consult plans for the Top of the Rockies Scenic Byway and the Collegiate Peaks Scenic Byway when making resource decisions in these areas.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

Management of BLM lands should harmonize with management of adjacent lands that are protected by conservation easements or owned by LTUA.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

Thousand Peaks Ranch is a 4,000-acre-plus ranch bounded in part by State Route 9, State Route 24, and County Road 24. From our home, we overlook the adjoining Antero Reservoir, as well as the Collegiate Peaks, Buffalo Peaks, and many other ranges. The ranch is zoned entirely agricultural and residential. Park County's zoning law prohibits mining, oil well, or gas well activity on the ranch.

Commenter1:John and Diane Fitzpatrick

Comment Excerpt Text:

C. Park County, Colorado, zoning laws do not permit oil, gas, or mineral extraction on Thousand Peaks Ranch. Permitting exploration on these lands in violation of Park County regulations would invite local, state, and federal litigation by state and local authorities, as well as private property owners such as ourselves. While you might consider such action to allow exploration and extraction to be within your power, oftentimes it is not appropriate to attempt to exercise those powers for no good purpose, considering our National Heritage status. The United States Supreme Court in its recent taking ca!>e involving a raisin farmer (Horne v. Department of Agriculture, _us_ [2015]) illustrates that it is sometimes wiser to not push unnecessary boundaries

Commenter1:Kennith and Mary Black

Comment Excerpt Text:

We are very concerned about various issues and outcomes that may follow: clean water, wetland/water resources protection, wildlife habitat, and noise and air pollution. The setbacks to private properties seem very minimal.

Park County Commissioners did an excellent overview of important considerations that need to be addressed by BLM before making such a major decision that affects so many people and resources for lifetimes.

Here are five major areas that seem very important to decision making:

Noise levels meet the state of CO, Park County and BLM statutes and rules

Setback adherence in water resource areas and gold medal streams areas

Advance monitoring system for air, water and noise quality in place

Purification and re-use of water system in place

Wildlife protection areas be maintained especially no leasing in the Reinecker Ridge elk migration area

How does mitigation of a problem get resolved and who is involved? Will Park County government be included? What monitoring will be done and by what agency to see that the impacts are minimal and being followed?

South Park is a unique treasure that needs a watchful eye as the area's resources are utilized and enjoyed by the people of Colorado for years to come.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

We are providing a link to the Park County Regulations that apply to oil and gas development within the County (http://parkco.us/DocumentCenter/Home/View/264 (Division 10)). These regulations may be updated to further address oil and gas issues.

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

The Draft EIS should evaluate how the future oil and gas activities will comply with the regulations of the Air Quality Control Division of the Colorado Department of Public Health and Environment. These include standards of performance in Regulation 6, Part A; emissions reporting and permitting framework in Regulation 3 Parts A, B, and C; and oil and gas control measures in Regulation 7 .

Organization1:Citizens for Huerfano County

Commenter1:Joseph Edes

Comment Excerpt Text:

[Huerfano County Comprehensive Plan of 2010. See comment letter for attachment.]

[Huerfano County Trails Master Plan of 2011. See comment letter for attachment.]

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

Congress is specific in its intent that the NEPA EIS and FLPMA process be conducted in tandem with locally-elected County Commissions, and BLM is responsible to remain apprized of and align its RMP scoping activities with local plans from the 38-County planning area. None of the documents we reviewed referenced solicitation, inventory or review of individual County Plans, and we believe this a directive to be a fundamental component of the alternative-generation process

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Noise

Applicable noise rules include the following:

- The Noise Control Ordinance of Park County (No. 12-01)
- The Colorado Noise Statute, § 25-12-103, Maximum permissible noise levels

The County would like to work with BLM and project managers on the use of potential noise BMPs for all projects, such as the following:

Construction of noise barriers

- Control of exhaust noise in order to be less than 49dB at 30 feet from the source
- Compressor noise mitigation including muffling or housing engines in acoustically insulated structures, or housing the entire compressor in an acoustically insulated building
- Park County Event regulations requirements are available at: http://www.parkco.us/DocumentCenter/View/253

Organization1:Colorado Cattlemen's Association

Commenter1:Bob Patterson

Organization2:Colorado Public Lands Council

Commenter2:Tim Canterbury

Comment Excerpt Text:

It is our belief that local citizens working together to resolve local issues offers the best chance of success. These voluntary local groups bring all interested stakeholders together, develop community-based solutions in response to discrete and unique conditions, and provide the on-the-ground work to implement their recommendations. Federal agencies should defer to those local working groups that are on the path toward achieving results and should not interfere with or conflict with the work of such groups. Any draft EIS or Environmental Assessment should identify any state or local working groups in their project areas and the work they are doing for conservation.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

Eastern Colorado planning area is rich in resources that represent the West's rich cultural and natural heritages, including numerous "major" and "lesser" sites included in the national park system through acts of the United States Congress under the National Park Service Organic Act of 1016 or Presidential executive order under the Antiquities Act of 1906. These sites, which reflect our nation's most defining historical moments and most treasured natural features, are afforded the highest level of protection under the law, and should be expressly factored into any regional planning effort.

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

What p-ocedures, methods or best practices will BLM incoroorate into the NEPA/EiS process to evaluate the potential -or interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

Organization1:Greater Arkansas River Nature Association

Commenter1:Alan Robinson

Organization2:GARNA

Commenter2:Alan Robinson

Comment Excerpt Text:

I would like to ensure that planners of the BLM Eastern Colorado Resource Management Plan are aware of considerable progress already made on a proposal to establish a 64-mile long hiking, biking, horseback and sometimes driving trail from Salida to Leadville in Chaffee and Lake Counties. It would celebrate, interpret and in some instances physically open to public recreation pieces of the historic Canon City to Leadville stage road of the 1870-1890 era, and the historic 1885 Colorado Midland Railroad. If established this would be a regional pathway involving use of a wide variety of existing public rights of way and some system and non-system routes on BLM as well as US Forest Service lands. Although some of these routes would lie within the Cooperative Management Area of the Arkansas Headwaters Recreation Area, and thus might be considered separately in the on-going revision of the AHRA River Management Plan, other

sections of the preferred alignment would cross BLM lands outside the AHRA corridor. Managers of the BLM Royal Gorge Field Office as well as the AHRA BLM River Manager in Salida have been actively informed or involved in the development of this proposal since about 2007, and in the two Colorado State Parks trails grant-funded studies which led to the May, 2015 publication of a draft Master Plan. This draft is now under consideration by the potential management entities along the route, including Chaffee and Lake Counties, the towns of Salida, Buena Vista and Leadville, the AHRA/CPW, local BLM and the Leadville District of the San Isabel National Forest. Cooperation has been assured by the Colorado Department of Transportation for sections that would involve their rights of way. All these entities have indicated their intention to designate and eventually implement the Plan substantially as proposed, subject to analysis of some of the details of routing and environmental issues. A more complete short summary is available at www.garna.org/stageandrail/. There you download the more recent of the two studies, the draft Master Plan, separated into three pdf files. Chapter 5 contains maps and descriptions of the 8 sections covering the preferred trail alignment from Salida to Leadville. Even at the scale of the section maps it may not always be clear where the preferred alignment lies with respect to BLM, FS, and county, town and private lands. A more precisely defined alignment is available at a finer scale as shapefiles and Google Earth (kmz) files which I would be pleased to share with you separately; they are currently being made available only to the potential managing partners.

B.2.5. Cooperating Agencies

Total Number of Comments: 11

Summary

The BLM should coordinate with and involve local communities, adjacent landowners, and county governments during the RMP/EIS process. Specifically, the following groups have expressed an interest in cooperating agency status or should have their plans/policies incorporated into the RMP/EIS:

- Huerfano County Board of County Commissioners, municipalities, and districts, and the Huerfano County comprehensive plan
- Colorado Water Plan and Arkansas Basin Implementation Plan
- Land Trust of the Upper Arkansas (as a potential cooperating agency)
- Park County and the county regulations, zoning, and planning documents and policies
- coordination with the Colorado State Land Board
- Southeastern Colorado Private Property Rights Council (as a cooperating agency)
- coordination with the Theodore Roosevelt Conservation Partnership
- coordination with the City of Aurora Water Department

Commenter1:Michael White

Comment Excerpt Text:

BLM must consider the views and involve local communities in the revision of this plan. To do so:

- BLM should engage local officials, elected and appointed leaders of subdivisions of the State: Huerfano County Board of County Commissioners, municipalities (Walsenburg and La Veta), and districts forms under Colorado law including those under Articles 30, 31, 32, 35, and 37.
- To the maximum lawful extent BLM should insure that the RMP is consistent with the master, comprehensive, or other land use plans of all political subdivisions of the State within Huerfano County, including municipalities and those districts which have planning authority under Colorado law.
- To the maximum lawful extent, BLM should insure that the RMP complies with the Colorado Water Plan and the Arkansas Basin Implementation Plan.

Organization1:Land Trust of the Upper Arkansas

Commenter1:Andrew Mackie

Comment Excerpt Text:

Please include the Land Trust of the Upper Arkansas in the list of Potential Cooperators included in the management plan. LTUA is an active local force in natural resources issues in Central Colorado.

Organization1:Colordado Independent Cattle Growers Association

Commenter1:Will Bledsoe

Comment Excerpt Text:

Coordination: Local residents, adjacent landowners, and county governments are more directly impacted by any action on BLM lands than any others. CICA strongly encourages BLM to utilize the Cooperating Agency process to engage and address specific planning alternatives and objectives with the local governments during the planning process.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County would like to work closely with BLM as alternatives, stipulations and BMPs are developed.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County requests that BLM consult with the County in the early planning stages of any proposed project on BLM lands. A Park County Special Use Permit will be required for projects such as recreation, mining, renewable energy, utility or communication sites, and other projects on BLM lands.

Organization1:Colorado State Land Board

Commenter1:John Valentine

Comment Excerpt Text:

There are some instances where SLB parcels are used for access to BLM properties in Park, Teller and Fremont counties that have caused misunderstandings with the public in the past. Closer coordination on access issues will lead to a better understanding of each agencies rights and responsibilities.

Are there any opportunities for sharing of infrastructure costs for fencing and water developments when BLM and SLB parcels are adjacent and the lease holder has both BLM and SLB leases?

Commenter1:Johnnie Mayhan

Comment Excerpt Text:

Identify and involve landowners in the process who may be impacted by the new plan.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

Identify and involve stakeholders throughout eastern Colorado—not just the usual crowd. Why is it that you are not willing to disclose who the stakeholders are? This really sends up a red flag!

Organization1:Southeastern Colorado Private Property Rights Council SECPPRC

Commenter1:Dianna Tixier

Comment Excerpt Text:

We intend, as a unit of local government exercising its NEPA prerogative with BLM, to coordinate land use planning in tandem with BLM as it implements its FLMP A, multiple-use directive and fulfills its responsibilities to balance Human Health and Natural Environment under NEPA:

The Congress ..... declares it is the continuing policy of the Federal Government, in cooperation with State and Local Governments ... . to use all practical means and measures ..... to create and maintain conditions where man and nature can exist together in productive harmony and fulfill the social, economic and other requirements for present and future generations of Americans.

Congress is specific in its intent that the NEPA EIS and FLPMA process be conducted in tandem with locally-elected County Commissions, and BLM is responsible to remain apprized of and align its RMP scoping activities with local plans from the 38-County planning area. None of the documents we reviewed referenced solicitation, inventory or review of individual County Plans, and we believe this a directive to be a fundamental component of the alternative-generation process:

"The Secretary [of Interior]. .. .. shall coordinate ..... the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located ... ... .In implementing this directive, the Secretary shall.. . ..... keep apprised of State, local, and tribal land use plans; assure that consideration is given to those State,

local, and tribal plans that are germane in the development of land use plans for public lands; assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and shall provide for meaningful public involvement of State and local government officials, both elected and appointed ..... "

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

The TRCP recommends that the BLM coordinate with CPW closely to ensure land use planning and habitat management objectives in the RMP achieve and sustain the state wildlife agency's population management objectives for species like mule deer, elk, bighorn sheep and others. Specifically, we ask that the Eastern Colorado draft RMP explicitly commit to providing habitat conditions that support CPW big game management objectives.

Organization1:City of Aurora Water Department

Commenter1:Marshall Brown

Comment Excerpt Text:

Aurora Water understands the need to update the MLP and is looking forward to working in cooperation with your office and other stakeholders to ensure the MLP provides opportunities for responsible energy development while protecting the watershed and our current and future water resources.

B.2.6. General NEPA Requirements

Total Number of Comments: 8

Summary

The BLM should incorporate procedures to evaluate the potential for interference with constitutionally protected private property rights and ensure compliance with Executive Order 12630.

The BLM should incorporate effective adaptive management.

The BLM should incorporate measurable, reproducible, and accurate scientific data and standards drawn from objective, peer-reviewed, publicly noticed documents and sources.

The BLM should update its lands with wilderness characteristics inventory to comply with BLM Manual 6310.

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

What procedures, methods or best practices will BLM incorporate into the NEPA/EIS process to evaluate the potential for interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

We recommend the Draft RMP/EIS identify the features of an effective adaptive management plan, including the following:

- Achievable and measurable objectives to provide accountability and guide future decisions;
- Specific decision thresholds with identified indicators for each impacted resource;
- Targets that specify a desired future condition;
- Commitment to implement a monitoring plan with protocols to assess whether thresholds are being met;
- Commitment to use monitoring results to modify management strategies as necessary; and
- Designated timeframes for completion of necessary management modifications.

Organization1:Muddy Valley Ranch

Commenter1:Kimmi Lewis

Comment Excerpt Text:

What procedures, methods or best practices will BLM incorporate into the NEPA/EIS process to evaluate the potential for interference with constitutionallyprotected private property rights and ensure compliance with Executive Order 12630?

Organization1:Prowers County Board of County Commissioners

Commenter1:Ron Cook

Comment Excerpt Text:

What procedures, methods or best practices will BLM incorporate into the NEPA/EIS process to evaluate the potential for interference with constitutionally-protected private property rights and ensure compliance with Executive Order 12630?

Organization1:Pikes Peak Group of the Rocky Mountain Chapter of Sierra Club

Commenter1:James Lockhart

Comment Excerpt Text:

Conflicts with Other Uses of BLM Land

BLM must consider the impacts of oil and gas operations on other common uses of land, such as grazing and recreation. The BLM must consider not only the direct impacts of drilling or oil and gas production, but also the indirect impacts inevitably associated with oil and gas development. The federal government is required to manage lands and land interests controlled by the BLM for multiple uses. Oil and gas operations are an exclusive, exclusionary use which renders the affected land unsuitable for many other uses, and severely limits other uses of nearby lands. The BLM should not treat oil and gas operations as a preferred use. Oil and gas operators have no "right to drill" on federal land. Rather, the BLM must weigh the benefits and impacts of their operations in relation to other uses, environmental concerns, and impacts to the public.

Organization1:Southeastern Colorado Private Property Rights Council SECPPRC

Commenter1:Dianna Tixier

Comment Excerpt Text:

The scoping process, draft EIS and ultimately the final RMP must include measurable, reproducible and accurate scientific data and standards drawn from objective, peer-reviewed, publically-noticed documents and sources. For those documents that are "influential" in nature - such as information, studies or data for RMPs - the federal standards are even higher

All reference documents BLM proposes to use must contain a clear, published, and a demonstrable record of 3rd- party scientific review and public access. As example, if BLM wishes to incorporate the June 2015 Management Analysis for the Eastern Colorado RMP or the April, 2015 Visual Resource Inventory by Logan Simpson into the RMP process, the Data Quality Act requires those documents be independently peer-reviewed and formally placed out for public comment prior to the agency proposing them for the NEPA Scoping process. Because of the far-reaching NEPA and FLMPA implications, quantitatively-based landscape-area procedures such as those referenced in BLM's H-8410-1 Manual must also have undergone a rigorous scientific and 3rd party review prior to utilization in NEP A and EIS scoping process.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must provide the public with an explanation of both the data used in analyzing the potential effects of management alternatives and the methods used to conduct the analysis, as well as an opportunity to provide comments and propose corrections or improvements.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In order to establish a true set of baseline conditions as required under NEPA, BLM must update its lands with wilderness characteristics to comply with Manual 6310 before the inventory can be used to inform management decisions.

B.2.7. Laws and Regulations

Total Number of Comments: 18

Summary

Commenters reminded the BLM of their legal obligations of numerous laws, including:

- The National Historic Preservation Act
- The Wilderness Act
- The Mining Law of 1872
- BLM Instruction Memorandum 2010-117
- BLM Planning for Fluid Mineral Resources Handbook H-1624-1
- Executive Order 11644, as amended by Executive Order 11989
- Paleontological Resources Preservation Act
- South Park National Heritage Area legislation and Executive Order 13287
- US Department of the Interior Secretarial Order 3308
- NEPA and FLPMA planning regulations
- Executive Order 13212, Actions to Expedite Energy-Related Projects
- Energy Policy Conservation Act of 2000
- Energy Policy Act of 2005
- Executive Order 12630, Governmental Actions and Interference with Constitutionally Protected Property Rights
- Executive Order 12866, Regulatory Planning and Review
- Executive Orders 12898 and 12250, Environmental Justice and Minority Populations
- Data Quality Act
- Executive Order 13352, Facilitation of Cooperative Conservation
- Executive Orders 12372 and 13575, Intergovernmental Coordination with State and Local Governments; White House Rural Council
- Executive Order 12291, Agency Accountability; Duplication Assessment; Cost/Benefit Analysis

Commenter1:Jeanne Younghaus

Comment Excerpt Text:

I feel BLM needs to renew their rules and oversight of uses during mechanized gold panning on BLM lands. I live on Arkansas River and have seen significant river bank erosion and the noise level is bad. I there a decibel limit?

Organization1:Park County

Commenter1:Jara Johnson

Comment Excerpt Text:

Park County understands that on June 11, 2011, the US EPA, the US Department of Agriculture, and the US Department of Interior entered into a "Memorandum of Understanding (MOU) Regarding Air Quality Analysis and Mitigation for Federal Oil and Gas Decision Through the National Environmental Policy Act Process." The goal of the MOU is to ensure effective and efficient NEPA air quality evaluations. Park County supports the MOU process. Under that process, if technical workgroups are convened, Park County would like to collaborate with the Agencies and participate as appropriate in the technical workgroups as a cooperating agency. We request the opportunity to review and comment on drafts of the technical work products

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Cultural Resources

Section 106 of National Historic Preservation Act (NHPA) requires agency officials to identify historic properties in a proposed undertaking's area of potential effect (BLM 2004: Section 23). The Wilderness Act clearly directs our stewardship of cultural resources in Wilderness areas. In its definition of Wilderness in Section 2(c), the Act states "an area wilderness . . . may also contain ecological, geological, or other features of scientific, educational, scenic or historical value" (NWSC 2002:12). The Wilderness Act does not supersede or override historic preservation laws, such as the National Historic Preservation Act and the Archeological Resources Preservation Act. Section 4 (a) of the Act states "The purposes of this Act are hereby declared to be within and supplemental to the purposes for which national forests and units of the national park and wildlife refuge systems are established and administered . . ." (NWSC 2002:2). Conversely, cultural resource laws do not supersede or override the Wilderness Act. If the cultural resources are in a Wilderness area, managers must comply the provisions of the Wilderness Act when conducting cultural resource activities, such as inventory, monitoring, treatment, and research (NWSC 2002:2). The Federal Land Policy and Management Act of 1976 (FLPMA) (43 U.S.C. 1701–1785) and the Wilderness Act (16 U.S.C. 1131–1136) direct BLM to manage wilderness areas for the public's use and enjoyment in a manner that will leave these areas unimpaired for future use and enjoyment as wilderness…[and] [u]nless Congress specifies otherwise, BLM must ensure the preservation of wilderness character in managing all activities conducted within wilderness areas (Federal Register Vol. 65, No. 241, December 14, 2000).

Organization1:Pikes Peak Group of Sierra Club

Commenter1:John Stansfield

Comment Excerpt Text:

Paleontological Values:

The BLM considers paleontological resources to be supplemental wilderness values, as provided for in Section 2(c) of the Wilderness Act. The BLM considers scientific research involving collection and removal of paleontological resources in wilderness and WSAs compatible with the concept of wilderness preservation as provided for in Section 4(b) of the 1964 Wilderness Act (BLM 1998: Section .09F1). Salvage, excavation and collection of all types of fossils may be done only on a casebycase basis where the project will not degrade the overall wilderness character of the area and where such activity is needed to preserve paleontological resources (BLM 1998: Section .09F1c).

Commenter1:Jay Gingrich

Comment Excerpt Text:

Many rules regulating mining were created when much more primitive methods and smaller scale operations were used in mining. Frequently the cost of repairing a mining site has far exceeded the value of any mineral taken from it. It then becomes the role of US taxpayers to pay for the cleanup and reparations of the site to prevent water and soil pollution from escaping. Regulation by the BLM must consider the long term effects and costs

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

Instruction memorandum 2010-117 and subsequent requirements in the BLM's Planning for Fluid Mineral Resources Handbook (H-1624-1, Chapter V), provide the BLM guidance for developing MLPs.

Commenter1:Nicholas Walter

Comment Excerpt Text:

BLM's obligations are described in Executive Order 11644 (1972), as amended by Exec. Order 11989 (1977), which directs the BLM to locate areas and trails so as to: "Minimize conflicts between off-road vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors." BLM regulations at 43 C.F.R. § 8342.1 reiterate the directives of the executive order.

Our private land use is an existing use that needs to be considered.

Organization1:Coalition for the Upper South Platte

Commenter1:Jara Johnson

Comment Excerpt Text:

Since the 1996 Royal Gorge Field Office Resource Management Plan and the 2005 Land Tenure Amendment were completed, lands within Park County received two federal designations. In 2006, all of Park County was designated as a Preserve America Community and in 2009, Congress created the South Park National Heritage Area (SPNHA), which encompasses 1,770 square miles within Park County. The legislation establishing the Heritage Area (Public Law 111-11, Section 8003) and Preserve America (Executive Order 13287) encourages federal agencies responsible for the management of cultural resources to consult and partner with the local government to accomplish agency goals

Organization1:Rocky Mt Recreation Initiative

Commenter1:Roz McClellan

Comment Excerpt Text:

The BLM Land Use Regs refer to the important of silence, solitude, remoteness of large blocks of unfragmentated habitat, IM 2013¬131. All four areas above are characterized by primitive recreation settings, described in the 2007 Colorado BLM Recreation and Visitor Services Strategy, as having "undisturbed natural landscapes." For example, all four areas have little mountain bike use on the ground, few trail encounters, and mostly low intensity horse and hiking use, if any.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM's obligation to preserve natural soundscapes is further described in Executive Order 11644 (1972), as amended by Exec. Order 11989 (1977), which directs the BLM to locate areas and trails so as to: "Minimize conflicts between off-road vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors." BLM regulations at 43 C.F.R. § 8342.1 reiterate the directives of the executive order.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Under NEPA, agencies can draft programmatic reviews that allow for future decisions to tier to the broader NEPA analysis provided earlier. 40 CFR 1508.28; 40 CFR 1502.20. This is true for both future site-specific projects as well as subsequent changes to planning decisions based on monitoring and triggers being hit. The Council on Environmental Quality's (CEQ) recent guidance on programmatic NEPA reviews provides: "A well-crafted programmatic NEPA review provides the basis for decisions to approve such broad or high-level decisions such as identifying

geographically bounded areas within which future proposed activities can be taken or identifying broad mitigation and conservation measures that can be applied to subsequent tiered reviews."

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

DOI Secretarial Order 3308 speaks to the management of the National Landscape Conservation System (National Conservation Lands). In pertinent part, the Order states that the National Conservation Lands "shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities." The 15-Year Strategy for the Conservation Lands reinforces this by emphasizing an ecosystem-based approach to management of the Conservation Lands in the context of the surrounding landscape. See also, BLM Manual 6100. Specifically, the Strategy requires coordination "across all BLM programs to more efficiently meet common goals, based on a common understanding of the designating legislation or presidential proclamation for a particular NLCS area." NLCS 15-Year Strategy at 13. Thus, BLM policy guidance requires all BLM managers—not just managers of units of the National Conservation Lands—to manage the broader landscape around units consistent with protective goals of the National Landscape Conservation System and the individual units within the system.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

The BLM has the authority and obligation to conserve high value public lands through the Federal Land Policy and Management Act (FLPMA). While FLPMA directs the BLM to conserve high value lands, the law affords the BLM considerable latitude in how those lands are conserved. FLPMA directs the BLM to "develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands" and to do so in accordance with principles of multiple use and sustained yield. [8. 43 U.S.C. § 1712(a), (c).] FLPMA defines "multiple-use" to include recreation and fish and wildlife, and to specifically provide for "the use of some land for less than all of the resources." [9. 43 U.S. C. § 1702(c).] FLPMA further provides for BLM to set management that "will preserve and protect certain public lands in their natural condition." [10. 43 U.S.C. § 1701(a)(8).] Some of the administrative approaches the BLM has taken to manage areas for recreation or wildlife habitat are incorporated into the agency's Land Use Planning Handbook, H-1601-1, or other manuals and guidance.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Handbook (H-1610 Appendix C, p. 6) requires field offices to:

"Designate priority species and habitats, in addition to special status species, for fish or wildlife species recognized as significant for at least one factor such as density, diversity, size, public interest, remnant character, or age. Identify desired outcomes using BLM strategic plans, state agency strategic plans, and other similar sources. Describe desired habitat conditions and/or population for major habitat types that support a wide variety of game, non-game, and migratory bird species; acknowledging the states' roles in managing fish and wildlife, working in close coordination with state wildlife agencies, and drawing on state comprehensive wildlife conservation strategies. Identify actions and area wide use restrictions needed to achieve desired population and habitat conditions while maintaining a thriving natural ecological balance and multiple-use relationships."

This guidance makes it clear that BLM already has policy in place to identify actions and restrictions necessary to achieve desired populations and habitat conditions. While such action will likely restrict development in some places, we believe BLM can meet its multiple use mandates and still offer leasing for development in a responsible way while managing to achieve the desired population goals for big game and maintain recreational opportunities that are important to sportsmen and vital to the local economy.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

Throughout the development of an RMP and associated EIS, BLM must consider Executive Order 13212 – Actions to Expedite Energy-Related Projects (2001). In the Executive Order, the President directs federal agencies to evaluate current programs, policies and rules, and to reduce barriers to America's energy self-sufficiency

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

BLM must also follow the requirements of the Energy Policy Conservation Act of 2000 and the Energy Policy Act of 2005 (EPAct) to reduce rather than increase impediments to federal oil and gas leasing.

Organization1:Western Energy Alliance

Commenter1:Tripp Parks

Organization2:Western Energy Alliance

Commenter2:Kathleen Sgamma

Comment Excerpt Text:

The Mineral Leasing Act, FLPMA, and BLM's own Planning Handbook all expressly limit the agency's authority to impose mitigation measures that would exceed the terms and conditions of previously issued leases. Operators retain the right to develop their leases in accordance with the terms under which they were issued, and BLM must ensure that any proposed management would not infringe on those rights.

Organization1:Southeast Colorado Private Property Rights Council

Commenter1:Jiliane Hixson

Comment Excerpt Text:

Specific, appropriate planning criteria we would like to see incorporated throughout the EIS, and alternative-generation process include:

a) EO 12630 - Governmental Actions and Interference with Constitutionally Protected Property Rights;

b) EO 12866 - Regulatory Planning and Review;

c) EOs 12898 and 12250 - EnvironmentalJustice and Minority Populations;

d) 2 USC §1501: Unfunded MandatesAct;

e) Section 515 of the Consolidated Appropriations Act, 2001 - Data Quality Act;

f) EO 13352 - facilitation of Cooperative Consen/ot/on,

g) EOs 12372 and 13575 - Intergovernmental Coordination with State and Local Governments; White House RuralCouncil ;

h) 5 USC §§ 601-612 Regulatory FlexibilityAct,

i) EO 12291 - Agency Accountability; Duplication Assessment; Cost/Benefit Analysis;

j) 40 CFR §1508.8 - Effects;

k) 40 CFR §1508.27(7) - Evaluation of Significant and Cumulative Effects of Actions on Human Environments;

i) 43 CFR §1510 - Resource Management Planning

1610.3-1Coordination

1610.3-2 Consistency Requirements

1610.4-1Identification of Issues

1610.4-2 Development of Planning Criteria

1510.4-3 Inventory Data and Information

1610.4-4 Analysis of ManagementSituations

1610.4-5 Formulation of Alternatives Fundamental Doctrines and Superseding National Policy:

Doctrine of Multiple Use

42 USC 54331(a) - "To create and maintain conditions under which man and nature can exist in productive harmony, and fulfill

the social, economic, and other requirements of present and future generations of Americans."

42 USC §4331(b) - "To use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate federal plans, functions and programs, and resources to the end the nation may - (5) achieve balance between population and resource use which permit high standards of living and a wide sharing of life's amenities."

B.2.8. Supplemental Rules

Total Number of Comments: 1

Summary

The BLM should implement a foreseeable timeline with deadlines for completing the supplementary rule process.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

This plan must specify that the process to complete any necessary supplementary rules that must be established must begin within one year of a final decision that would require those supplementary rules. The BLM must actively strive toward a goal of completing the supplementary rule process within 2 years of final decisions. Timelines and deadlines are necessary to ensure the BLM focuses on the supplementary rule process. The RMP should take steps to avoid and prevent cases like the Fourmile Travel Management Plan, where 13 years have passed and certain necessary supplementary rules are not yet in place.

B.2.9. Monitoring

Total Number of Comments: 2

Summary

The BLM should consider comprehensive monitoring plans for several resources in the RMP/EIS. The plans should meet all Assessment, Inventory, and Monitoring (AIM) requirements and include reliable, measurable, and consistent indicators of ecosystem and species condition, a process to adjust management plans based on monitoring information, and an explicated system for making monitoring data publicly available to allow stakeholders to evaluate whether goals and objectives are being met. Plans should also articulate acceptable ranges of variation in indicators and employ triggers for adaptive management to achieve conservation goals, and should be designed to reduce areas of uncertainty identified in the pre-planning assessment.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

As identified by BLM during public listening sessions on Planning 2.0, management plans must include a comprehensive monitoring strategy that meshes with the AIM Strategy. Indicators of ecosystem condition and necessary conservation conditions for special status species (i.e., habitat, human development and land use, and conditions needed to sustain the species), identified and evaluated in pre-planning assessment(s), and employed to develop conservation measures within management plans, should be carried forward into a monitoring program that evaluates the effectiveness of the Eastern Colorado RMP in providing those conditions. The monitoring plan should articulate acceptable ranges of variation in indicators and employ triggers for adaptive management to achieve conservation goals. The monitoring plan should also be designed to reduce areas of uncertainty identified in the pre-planning assessment, and to test assumptive relationships between planning decisions, management actions, and ecosystem/species response.

Organization1:Defenders of Wildlife

Commenter1:Lauren McCain

Comment Excerpt Text:

The Eastern Colorado RMP should include the following components related to monitoring:

1. A monitoring plan that is incorporated into the RMP.

2. Reliable, measurable and consistent indicators of ecosystem and species condition in assessment, planning, and monitoring.

3. A process to adjust management plans based on monitoring information.

4. An explicated system for making monitoring data publicly available to allow stakeholders to evaluate whether goals and objectives are being met. For example, a plan monitoring report could be developed every two years to determine, with public input, whether changes are needed to plan decisions based on monitoring information.

B.3. Other General RMP Comments

B.3.1. General Plan Comments

Total Number of Comments: 37

Summary

Comments in this category address multiple resources to be considered in the RMP. These resources are covered in the issue categories considered elsewhere in this appendix.

Commenter1:Margaret Payne

Comment Excerpt Text:

This giveaway to the oil and gas industry does not advance our common interest which must be to move away from the reliance on extractive energy resources.

Commenter1:Eddie Kockman

Comment Excerpt Text:

Park County has extensive historical, paleontological, archeological sites, which are well known and documented. Others are yet to be fully documented including sites on private, municipal, state lands and lands administered by the BLM and Forest Service. In addition certain species of native flora that are very limited in range also exist in portions of Park County. Both the MLP and revision of the RMP plan should identify these resources and determine potential impacts.

Commenter1:Dan Murray

Comment Excerpt Text:

Do all possible to maintain H2O quality and improve wildlife habitat

Commenter1:Red Carpenter

Comment Excerpt Text:

With BLM being “Multiple Use” it needs to remain that way. No matter what the use is- it needs to be managed in such a way that is healthy for the land. Grazing has standards and guidelines and other uses need them as well. Wood harvesting is beneficial and logging roads can be reclaimed after the wood is harvested. Roads can be beneficial to all uses on BLM and can be a benefit for

all. Older people and disabled people need roads to enjoy their land. Mining is a very important use and can be done in such a way that is van be somewhat reclaimed after the mining is over.

Commenter1:Lyndon Berry

Comment Excerpt Text:

I would expect that such a far reaching planning process be primarily concerned with:

- Identification and inventory of all BLM lands, and parcels of BLM lands, within Eastern Colorado.
- References to documentation (if any) of each parcel as to existing administration/management rules, regulations: usage goals, etc.
- A conclusion for each parcel if such administration/management and goals are; sufficient, insufficient, not needed, needed, uncertain, etc.

Each of these many parcels could be described in terms of the categories already defined within the RMP.

Commenter1:Lyndon Berry

Comment Excerpt Text:

Before any detail planning for future activity/usage within any BLM parcel overall objectives for this area must be defined and documented by all affected users or user groups. In this regard adjacent Forest Service, other agency, and private users need to be included. And other 'user groups' that cannot speak for themselves, such as wildlife and even plant life should be included.

Furthermore, it must be expected that affected users for any BLM parcel/area will include those residing and influenced beyond the actual parcel/area boundary.

A very good example would be the area east of Buena Vista Colorado. At this time recreation planning is being undertaken primarily by ATV and mountain bike users. However the impacted area is much larger than the BLM lands being considered, and the issues being discussed will affect many other categories than recreation

Commenter1:Lyndon Berry

Comment Excerpt Text:

I am particularly interested with "issues of Conservation and Environmental Concern" which have influence far beyond any political or geographical boundary. In this regard, there is a small parcel of BLM land to the north of Buena Vista and on the west of the Arkansas River. At the present time there is no management or user-plan for this area. However, with increasing frequency vehicles and campers are using this area and the degradation to the ground, plant life and river bank is expanding.

Each of these two areas need comprehensive and specific usage objectives defined.

Commenter1:James Field

Comment Excerpt Text:

From the eastern flanks of the Sangre de Cristo Wilderness to the headwaters of the mighty Arkansas River, these special places need to be safeguarded for their wilderness, recreation, and wildlife values, and protected from extractive or industrial uses such as mining and drilling for oil and gas.

Commenter1:Rose Chilcoat

Comment Excerpt Text:

With the ever increasing urbanization of Colorado's Front Range and the demands that burgeoning population place on our wild lands, it is imperative that public lands managers prioritize protection of remaining natural areas in ways that preclude damage and degradation

Commenter1:Sharon Hale

Comment Excerpt Text:

I support strong administrative protections for lands that will prevent damage from unconfined motorized recreation, oil and gas development, and other disturbances.

Organization1:National Park Service

Commenter1:Sue E. Masica

Comment Excerpt Text:

We ask that impacts to the NPS units be specifically evaluated in the EIS in a dedicated section that holistically evaluates the potential impacts on these nationally designated areas administered by the NPS. A fragmented analysis that does not directly address impacts to NPS units would make it difficult to understand the full implications of proposed development on these important national areas and their associated resources. Further, we recommend that the EIS give attention to any mitigation options necessary to avoid adverse impacts on these NPS units, and identify follow-up monitoring necessary to evaluate the efficacy of any mitigation measures. Including EIS sections dedicated to addressing impacts to special status areas is recommended in BLM Instruction Memorandum No. 2011-0 59 on National Environmental Policy Act Compliance for Utility-Scale Renewable Energy Right-of-Way Authorizations. While the EIS will address development of minerals, renewable and nonrenewable energy resources, connected development, and other land use issues, the Bureau of Land Management has the flexibility to include an analysis dedicated to park resources impacts, as requested by the NPS.

Commenter1:Will Pirkey

Comment Excerpt Text:

I fully understand the need to extract domestic oil and gas resources alongside other subsurface minerals but encourage the BLMs Royal Gorge Field Office to do so in a manner that protects other natural resources such as the Arkansas River, its tributaries, wildlife, and recreational opportunities.

Commenter1:Morris Bradley

Comment Excerpt Text:

I'd like to encourage you to take a balanced approach to your planning efforts by conserving as much of the Arkansas River Corridor as possible. If lands became open for oil and gas development, mining, logging, or other forms of natural resource extraction along the Arkansas River from Salida to Canyon City I would no longer visit that part of the state and maybe even choose another state to visit. Please protect this area by closing it to any natural resource extraction.

Commenter1:Mike Sugaski

Comment Excerpt Text:

The revision to the RMP should be kept flexible enough to incorporate new trends, needs, and ideas during the life of the plan. The Plan should be updated when there is a greater good that can come of it in a timely manner. Updates, revision, or adaptive management needs should not take an ungodly amount of time with analysis paralyses.

Commenter1:Eric Rachel

Comment Excerpt Text:

If multipe use is the theme of the BLM then why are allowing the fracking? After fraking is done there won't be much use of there lands. Roads and associated weeds, soil compaction, will make the land more fire suseptible and decrease wildlife habitat.

Commenter1:Jean Smith

Comment Excerpt Text:

Landscape scale planning

This is a most important aspect of BLM's planning process. Management on a parcel by parcel basis is totally inadequate to the challenges facing public lands from climate change, increasing population and community development, energy concerns and demands for recreation. In addition to planning across BLM's jurisdictions, it is also important that BLM take into consideration federal, state and county public lands that are contiguous with your parcels. Cooperation among government agencies is both desirable and necessary for good stewardship.

Commenter1:Mike Malick

Comment Excerpt Text:

Not that there is anything inherently wrong with it, but there seems to be more Wilderness and other such designations in recent years that severely limits recreation opportunities in those areas. We are all for protecting areas, but that needs to be done responsibly without continually eroding the ability of folks to get and and enjoy doing a wide range of activities. For example, we recently purchased a small popup camper, but those are completely out of the question as wilderness areas do not allow motorized vehicles and the popup is far too cumbersome to move over distances via my foot power. BLM lands seem to be a dying breed replaced by very restrictive areas.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

While perhaps an oversight, the Federal Register Notice of Intent for the RMP does not include a fish biologist as one of the specialists that will be involved in the planning process. We strongly recommend the BLM add a fish biologist to the planning team.

Organization1:Trout Unlimited

Commenter1:Cathy Purves

Comment Excerpt Text:

The BLM is a participant in the Greenback Cutthroat Trout Recovery Team and not only should the BLM representative contribute to the RMP review but the Team's involvement and commitments should be reflected in the RMP analysis.

Organization1:Bent County Board of County Commissioners

Commenter1:Bill Long

Comment Excerpt Text:

The scoping process, draft EIS and ultimately the final RMP must include measurable, reproducible and accurate scientific data and standards[4] drawn from objective, peer-reviewed, publically-noticed documents and sources. For those documents that are "influential" in nature such as information, studies or data for RMPs - the federa1 standards are even higher.

Organization1:USEPA Region 8

Commenter1:Angelique Diaz

Comment Excerpt Text:

Based on our current understanding of the planning area, the EPA has identified the following topics that we recommend be analyzed and disclosed in the Draft RMP/EIS so that potential impacts to public health and the environment can be fully understood: (1) air resources; (2) groundwater resources; (3) surface water resources; (4) public drinking water supply resources; (5) wetlands, riparian areas and floodplains; (6) water management and water resource monitoring; (7) livestock grazing; (8) greenhouse gas (GHG) emission and climate change; and (9) environmental justice. We also note that for the South Park Area MLP, the Upper South Platte watershed is a critical water supply area for 75% of Colorado citizens. For this reason, this area may warrant additional mitigation measures to ensure protection of this important resource.

Organization1:National Parks Conservation Association

Commenter1:Vanessa Mazal

Comment Excerpt Text:

Under FLPMA, and concerning the specific characteristics of the Eastern Colorado planning area, it is appropriate for the RGFO to strive to achieve diverse management objectives that emphasize a long-term vision of human health protection, and the enjoyment and safeguarding of the cultural and natural resources in the area, over the goal of short-term gains from intensive mineral extraction.

Organization1:Quiet Use Coalition

Commenter1:Tom Sobal

Comment Excerpt Text:

An initial step in the RMP should be to assess the carrying capacity of the landscape. Our public lands cannot accommodate unlimited development of trails, energy extraction, facilities, etc. BLM lands cannot be all things to all people. Capacity limits should be considered throughout the planning processes.

Commenter1:Gene R. Reetz

Comment Excerpt Text:

WILDERNESS, NATURAL AREAS, AREAS OF CRITICAL ENVIRONMENTAL CONCERN

As Colorado's populations continues to grow the protection existing "natural areas" and biodiversity becomes even more critical.

- The RMP should include a thorough and complete inventory of all the wilderness, potential wilderness, "natural areas", areas of Critical Environmental Concern, areas of significant biodiversity, critical habitat, etc..
- The inventory should include information from the Colorado Division of Parks and Wildlife, the Colorado Natural Heritage Program, Rocky Mountain Wild, The Nature Conservancy, etc.
- The above inventory should be included in the Draft RMP/EIS in both narrative form and maps.
- All proposed activities/management plans (i.e. oil/gas/mineral leasing, travel plans, grazing, recreation, etc. should be evaluated in terms of impacts to the above resources.
- The Draft RMP/EIS should maximize protection of the above resources.

Thank you for considering my comments in the preparation of the Draft RMP/EIS.

Commenter1:Julie Sumpter

Comment Excerpt Text:

Identify and involve land and mineral owners within the boundaries of the Eastern Colorado BLM Regional Management Plan area

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM should take advantage of the opportunity to provide a range of alternatives under future scenarios that could inform future NEPA analyses. Acknowledging that the agency cannot foresee all future outcomes or options for management, the agency could establish a team and/or process that allows for additional input to provide advice on adjusting management in the future that were not covered under the range of alternatives.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

In certain situations, overlapping designations are needed to fully protect the resources, for example management of WSAs might differ greatly from the special management attention envisioned for the relevant and important values of a particular ACEC or in the event of congressional WSA release.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

The analyses discussed in these scoping comments must be completed prior to authorizing activities that will contribute to these impacts, such as oil and gas leasing, in order to determine whether and under what conditions they can be approved, such that significant impacts on the environment can be prevented. To the extent that the BLM defers any of the recommended analyses, we request that the RMP commit to a time period for completion and confirm that they will be completed prior to approval of contributing activities.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Mitigation is most effective when planned at a regional scale so that development avoids impacting critical conservation resources and compensatory mitigation investments are directed to areas and activities that will best fully address unavoidable development impacts. In outlining a landscape-scale mitigation strategy for the Royal Gorge Field Office, BLM should apply the mitigation hierarchy of avoidance, minimization, and offsets.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

BLM must analyze mitigation measures in sufficient detail and explain how effective the measures would be. BLM should include the four elements of landscape-scale mitigation planning outlined in Draft MS-1794 in the Eastern Colorado RMP. By establishing regional mitigation objectives for the planning area, BLM can identify durable, additional land use allocations that appropriately mitigate likely impacts from development authorized under the RMP.

Organization1:The Wilderness Society

Commenter1:Juli Slivka

Organization2:Wild Connections

Commenter2:James Lockhart

Organization3:Rocky Mountain Wild

Commenter3:Tehri Parker

Organization4:Central Colorado Wilderness Coalition

Commenter4:John Stansfield

Organization5:Quiet Use Coalition

Commenter5:Tom Sobal

Organization6:Sierra Club

Commenter6:Alan Apt

Organization7:Conservation Colorado

Commenter7:Scott Braden

Organization8:Great Old Broads for Wilderness

Commenter8:Misi Ballard

Organization9:National Parks Conservation Association

Commenter9:Vanessa Mazal

Comment Excerpt Text:

Data and inventory information: There is an extensive list of datasets and information sources at the disposal of BLM to inform planning efforts in the Eastern Colorado RMP. BLM should make strong effort to provide stakeholders with GIS data and other datasets used in making decisions. Where there are gaps in data or inventory information, BLM should make data calls to the public and institutions to help with collection of data. Information and data sharing between the public and BLM is an important means of increasing planning efficiency, avoiding conflict, and ensuring the appropriate data is used for land-use planning. At all points, BLM should use the best data available in the RMP process.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

The BLM should consider Backcountry Conservation Areas

In order to conserve intact and undeveloped lands with high-quality habitats, in a way that maximizes public support and minimizes conflict, we recommend that the RGFO RMP utilize Backcountry Conservation Areas. BCAs should be applied to conserve, maintain, restore and enhance the conservation value of areas of BLM administered public lands that are generally intact and undeveloped, contain important habitats for fish and wildlife, and provide dispersed outdoor recreation opportunities. The BCA should include a standard set of core management principles to ensure that all allocated areas are consistently and meaningfully managed to conserve important fish and wildlife habitat and the intact and undeveloped nature of each area, despitedevelopment pressures. The BCA should also allow locally identified and adapted policies to meet local and regionalconservation, maintenance, restoration and enhancement needs. BCAs should be developed in a way that maximizes support fromstakeholders and minimize the potential for conflict surrounding the conservation of high value lands.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

Proposed management principles for BCAs

We believe the following management principles should be incorporated to ensure the continued maintenance, conservation and restoration of these intact lands:

- Conserving specific, generally intact and undeveloped areas with high-quality fish and wildlife habitat and/or significant recreation opportunities, such as hunting and fishing.

- Keeping areas open to hunting, fishing, trapping and other outdoor recreation and ensuring that the Colorado Parks and Wildlife retains management authority over fish and wildlife populations.

- Maintaining improved roads, primitive roads and motorized trails located outside of BCA boundaries that serve as important access points to BCAs. BCA boundaries should be adjusted to Rocky Mountain bighorn sheep, photo by Dusan Smetanaexclude improved roads, but primitive roads and motorized trails could extend within BCA boundaries.

- Maintaining motorized routes located within BCA boundaries that are important for public access. The BLM should manage primitive roads and motorized trails within BCA boundaries to maintain their existing character and should not improve routes to a higher transportation standard. The BLM may close redundant routes and routes of little access value and enact closures for the purposes of resource conservation.

- Restricting the construction of new improved roads, primitive roads and motorized trails within designated areas pursuant to emergencies and valid existing rights and excluding cross-country vehicle travel to conserve unfragmented habitat and hunting and fishing opportunities. Designate BCAs as limited travel management areas.

- -Instituting vegetation management projects that improve fish and wildlife habitat, control noxious weeds, restore forests and rangelands and reduce the risk of wildfire. This could include projects that restore sage brush and quaking aspen or control cheat grass. Such projects should be developed in a way that maintains the backcountry character of BCAs.

- Allowing prescribed burning to mimic natural processes, herbicide application to maintain and restore native vegetation and the installation of water developments that benefit wildlife.

- Allowing chainsaws, helicopters and equipment for land management projects, while maintaining the character of backcountry areas.

- Conserving fish and wildlife habitat by requiring that rights-of-ways and conventional and renewable energy development be excluded from designated areas, with the exception of existing infrastructure and projects pursuant to outstanding rights. This should include non-waivable no surface occupancy leasing stipulations for oil and gas development.

- Honoring valid existing rights, contracts and permits, and having no impact on rangeland health standards and public lands grazing allotments and maintaining the ability of ranchers to maintain agricultural improvements

- Allowing the suppression of range and wild land fires utilizing mechanized equipment. Sportsmen are already working with the recreation community, ranchers, fish and wildlife professionals, decision-makers and others to advance the BCA model. A growing body of stakeholders is hopeful that this new conservation approach will be embraced by the BLM and be replicated in other areas of the West.

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

We propose that the following areas be allocated as BCAs in the RGFO RMP. These areas represent much of the last best remaining generally intact and undeveloped backcountry areas in the RGFO, and they should be conserved for the benefit of hunters, anglers and many other users of public lands. All of these lands possess high-quality fish and wildlife habitat and provide high-quality non-motorized recreation opportunities and are of sufficient size to allow their conservation.

[chart] Group / Proposed BCAs / Acres

South Park/Northern Arkansas

- James Mark Jones Adjacent 4,392 (no lease); 5,269 (NSO)
- Fourmile Creek 5,484
- Red Hill 3,250
- Mosquito Pass West 1,695
- Mosquito Pass East 7,018
- Granite 3,786

Southern Arkansas

- Cottonwood 4,720
- Baldy 15,561
- Badger Creek 5,382
- Arkansas Mountain 18,947
- Deadmans Hill 2,552
- Hindman Gulch 9,126
- Waugh Mountain 6,622
- Cottonwood West 2,640
- Cottonwood East 4,002

- Hammond 3,371
- Wormer Gulch 7,163
- Crampton Mountain 8,249
- Iron Mountain 2,857

Cripple Creek

- Eightmile Mountian 19,452
- Cooper Mountain 19,202

La Veta/Sangre de Cristo

- Oak Creek 3,255
- Gardner 3,048
- Silver Mountain 1,972
- Badito 7,301
- Little Sheep Mountain 3,651
- Point of Rocks 1,002
- South Huerfano 4,947
- North Huerfano 2,620
- Mount Mestas 3,754
- Wolf Springs 4,735

Total - 200,898

Organization1:Theodore Roosevelt Conservation Partnership

Commenter1:Joel Webster

Comment Excerpt Text:

We urge the BLM to include BCAs [Backcountry Conservation Area] in the preferred alternative of the Eastern Colorado draft RMP so this management approach can be fully considered by the public and analyzed throughout the NEPA process.

Organization1:GPAA/Public Lands for the People

Commenter1:Garry Vaughn

Comment Excerpt Text:

All coming changes to be notified of prior/public vote should be up to public.

Commenter1:Todd Herzog

Comment Excerpt Text:

I encourage the Resource Management Plan to maintain a balance of competing needs. Many of these are close to populated and developed areas and can be subjected to overuse and/or differing user needs. ORV's need sustainable road infrastructure, but as a hiker, I desire quiet and natural areas free of motorized vehicles and other development (e.g. mining, forestry).

These lands provide significant economic benefit to the region from outdoor tourism related activities. Many of these tourists come to this area (Salida/Ark river valley) specifically to enjoy its natural environment. The protection of this natural habitat is critical to the economic lifeblood of the region.

This page intentionally
left blank

Appendix C. List of Commenters

The 60-day formal public scoping period began on June 1, 2015, with the publication of the NOI in the *Federal Register* (Vol. 80, No. 104, page 31063), and ended on July 31, 2015. Comments received until August 3, 2015, are considered in this Scoping Summary Report. List C.1, Commenters Who Submitted Individual Comments or Form Letters with Additional Substantive Text, lists the commenters who submitted individual unique comments, as well as commenters who submitted form letters with additional unique substantive text. This list does not include those who submitted form letter submissions without unique substantive text. All comments received on or before August 3, 2015, are included in this report and were added to the mailing list if commenters provided contact information. Those commenters who submitted or signed standard form letters from form letter campaigns are not included in List C.1. Table C.1, Form Letter Submissions by Organization, includes a description of the number of form letters submissions received from all form letter campaigns.

List C.1. Commenters Who Submitted Individual Comments or Form Letters with Additional Substantive Text

1. Adam Sloan
2. Alan Apt, Wilderness Chair, Sierra Club, Rocky Mountain Chapter
3. Alan Heald
4. Alfred Webster
5. Alison Gallensky
6. Alison Gannett
7. Amy Frisina
8. Andrea Blocker
9. Andreia Shotwell
10. Andrew Koransky
11. Andrew Mackie, Land Trust of the Upper Arkansas
12. Andrew Sellman
13. Andrew Tuke
14. Andrew Wright
15. Angela Miller
16. Angelique Diaz, Environmental Protection Agency
17. Angie Jenson, Terra Firma Forestry
18. Anne Akers-Lewis

19. Ashlee Davis
20. Audrey Wheeler
21. Aurora Water
22. Bennie Contreras
23. Betsy Rich
24. Bianca Abeyta
25. Bill & Ida Beaudin
26. Bill Canterbury, Colorado Outfitters Agency. Fremont Cattlemens
27. Bill Dvorak
28. Bill McCormick
29. Blanche1 Nixon
30. Bo Wagstaff
31. Brad Davis
32. Bradley Morris
33. Brenda and Mark Wiard
34. Brenda Sanders
35. Bret Williamson, CMTRA
36. Brien Webster
37. Brooke Murphy
38. Bruce Cratty
39. Carol Beckman
40. Carolyn Oldewage
41. Carolyn Taylor
42. Carolyn Usher
43. Carrie Miller, United Country Real Estate, Timberline Realty, Inc.
44. Cathy Purves, Science & Technical Advisor, Sportsmen's Conservation Project, Trout Unlimited
45. Charles Burton, High Rocky Riders
46. Chas Clifton

47. Chelsey Russell
48. Chris Canipe
49. Chris Saeger, Director, Western Values Project
50. Christopher Keefe
51. Claude Neumann
52. Claudia Ryan
53. Clay Stewart, Chairman, Lake County Recreation Advisory Board Winter Trails Committee
54. Colorado Parks And Wildlife
55. Connie & Dale Pace
56. Connie Goscinski-Smith
57. Connie Smith
58. Connor Brockmeier
59. Constance Steeples
60. Dale Lyons
61. Dan Butler
62. Daniel Griffith
63. Dariel Blackburn
64. Darin Anderson
65. Daryl Sena
66. Dave Van Manen, Mountain Park Environmental Center
67. David Ellenberger
68. David Owens
69. David Weinzimmer
70. David Williams
71. Dawn Klco
72. Deb Overn
73. Debbie Kreuser
74. Deborah Sheinman, Wilderness Connection
75. Dee Dubin

76. Dena Taylor
77. Derick Ruiz
78. Diana Tixier, Southeastern Colorado Private Property Rights Council
79. Diane Rehner
80. Dick Gray
81. Dina Steeve
82. Don Chapman, Superintendant, Riverside Irrigation District/Riverside Reservoir & Land Co.
83. Donna Rhoads, Salida-area Parks, Open-space & Trails
84. Dorothea Leicher
85. Doug Schoch
86. Douglas H. Walter
87. Dr. David W. Moore
88. Dustin Huntsman
89. Earl Richmond
90. Ed Talbot
91. Eddie Kochman, Park Co. Landowner
92. Eddie Soto
93. Eko Little
94. Elaine Brush
95. Elaine Scallan
96. Elisabeth Braun
97. Eliza Carter
98. Elizabeth Wittington-Chamber
99. Ellen Johnson-Fay
100. Emil McCain
101. Eric Candee
102. Eric Polczynski
103. Eric Rachel
104. Eric Tussey

105. Eva Bovenzi
106. Evi Bunker
107. Evi Klett
108. Fisher
109. Fran Field
110. Frank Lampe
111. Frank Swain
112. Fred Rasmussen
113. Garrett Hanks, Colorado Trout Unlimited
114. Garry Vaughn, Colorado Mineral & Ore Co., Public Lands for the People
115. Gene Reetz
116. George Alderson
117. Glenn Mc Caslin
118. Gregg Grant
119. Heike Momiyama
120. Jaci Dvorak
121. Jack Paterson, Deborah "Debbie" Ortega, Councilwoman, Denver City Council
122. James Baker, Phantom Cañon Partners Ltd.
123. James Eric McGee
124. James Field
125. James Johnson, Elk Glade Outfitters
126. Jan Zinkl
127. Jane Fasullo
128. Jane Fillmore
129. Janice Sacherer
130. Janis Frazee
131. Jara Johnson, Coalition For The Upper South Platte/Park County
132. Jason Bertolacci, International Mountain Biking Association
133. Jay Gingrich

134. Jean Public

135. Jeffrey Leidigh

136. Jeremy Fancher, Interim Policy Director, International Mountain Bicycling Association

137. Jeremy Winick

138. Jerry & Marie Vernarsky

139. Jessica Monson, VP of Business Devel. & Legal Affairs, Life Time

140. Jillane Hixson

141. Jim Engelking

142. Jim Lockhart, Wild Connections

143. Jim McCain, Citizens for Huerfano County

144. Jim Walker

145. Jim Wells

146. John and Diane Fitzpatrick

147. John Chavis

148. John Fielder

149. John O'Toole

150. John Sztukowski

151. John Valentine, Colorado State Land Board

152. Jonita Davenport, Project Director, Over the River

153. Jordan Bresson

154. Joseph Edes, Huerfano County Federal Mineral Lease District, Citizens for Huerfano County

155. Josh Kuhn, Conservation Colorado

156. Julie Sumpter

157. Julie Westland

158. Justin McGehee

159. Justin Zeisler, Colorado Springs Utilities

160. Karen Larsen

161. Karl Ford, CMC; Denver Conservation Committee

162. Karyn Ames

163. Kate Spinelli

164. Kate Toan

165. Katherine Delanoy

166. Kathleen Zimmerman, National Wildlife Federation

167. Kathy Peterman

168. Kay Hawklee, Vice President, Tallahassee Area Community

169. Keith Baker

170. Keli Kringel, Citizens for Huerfano Cty

171. Kelsey Ashton

172. Ken Last

173. Ken Pals

174. Kenneth and Mary Black

175. Kenneth and Mary Black

176. Kenneth Sajdak

177. Kevin Bradley

178. Kevin Clement

179. Kim Hoover

180. Kimmi Clark Lewis, Muddy Valley Ranch LLC

181. Kris Godwin

182. Kristin Green

183. Kristin Skoog, Wild Connections

184. L.D. Bullock

185. Lauren Giusti

186. Lauren McCain, Defenders of Wildlife

187. Lauren Swain

188. Leanna Mahuka

189. Lilly Zoller

190. Linda Fabiano

191. Lindsay Cohen

192. Lisa Darling, South Platte Program Manager | City of Aurora
193. Lisa Godwin
194. Lisa Simmons
195. Loni Walton
196. LuAnn Glatzmaier
197. Lydia willing
198. Lyn Lowry
199. Lyn Miller
200. Lyndon Berry
201. Lynn Welch
202. Maggie Niemann
203. Mallory Luebke
204. Marcia Beachy, Certified Clinical Hypnotherapist - Regression Therapist
205. Margaret Payne
206. Maria Albricka
207. Mark Ferrell
208. Marta Moore
209. Martha Silva
210. Mary Ann Dimand
211. Mary Ann Flood
212. Mary Ewing
213. Mary Gilkison
214. Mary Mourar
215. Mary O'Brien
216. Mary PhillipsBurke
217. Mary Wedman
218. Matthew Buddie
219. Maya Kurtz
220. Megan Faber

221. Melissa Norman

222. Micah Parkin, Executive Director, 350 Colorado

223. Michael N Malick

224. Michael Smilie

225. Michael White

226. Michal Rosenoer

227. Michele Ostrander, Audubon Society of Greater Denver

228. Michele Page

229. Mike Conlin, Lake County Open Space Initiative

230. Mike Smith

231. Mike Sugaski

232. Misi Ballard, Great Old Broads for Wilderness & Wild Connections

233. Monica Steensma

234. Nancy Kosnar Hartman

235. Nancy Oswald

236. Nate King

237. Neil Michael Cloyd

238. Nenette McNamara

239. Nic Callero

240. Nicholas DiOrio

241. Nicholas Walter

242. Nick Owens, Anadarko Petroleum

243. Nicole Shook

244. Paige Teegarden, President, Think Outside

245. Pamela Finnegan

246. Phil Sasso

247. Piera Kllanxhja

248. Preston Preble

249. Priscilla Walter

250. Prowers County Commissioners

251. Rachel Hicks

252. Randy Mack

253. R. Burghilde

254. Renee Larrarte

255. Renee Still Day

256. R. F.

257. Rob Dubin

258. Robert Lomenick

259. Robert Port, Cowboy Camp

260. Robert Volpe

261. Rochelle Briscoe

262. Roger Castle

263. Roger Silberberg Peirce

264. Ron Blidar

265. Rosalyn McCain, Citizens for Huerfano County

266. Rose Chilcoat

267. Roz McClellan, Rocky Mountain Recreation Initiative

268. Ruth Leuchte

269. Ruth Meinking

270. RuthCarol Cushman

271. S. Harrell

272. Sacha Halenda, Form Five

273. Sally Mathewson

274. Sam Schabacker, Associate Organizing Director, Food & Water Watch

275. Sasha Nelson

276. Sawyer Connelly

277. Scott Simmons

278. Sean Ryan

279. Seetta Moss, Arkansas Valley Audubon Society

280. Sharon Hale

281. Sharon Hale

282. Skip Edwards

283. Sonia ImMasche

284. Sophia Guerrero

285. Spencer Steers

286. Stacy Fredrickson

287. Stephanie Mondragon, Bjork Lindley Little PC

288. Stephanie Swink

289. Steven Horneffer

290. Steven Peterman

291. Steven Tempelman

292. Stuart Coles, The Wilderness Society

293. Sue Schoultz

294. Sully Howard

295. Susan Innis, Manager, Siting and Land Rights, Xcel Energy

296. Susan Lomenick

297. Susan Price

298. Susan Roebuck

299. Suz Leonard

300. Suzanne O'Neill, Executive Director, Colorado Wildlife Federation

301. Suzanne Watson

302. Taylor McKinnon, Public Lands Campaigner, Center for Biological Diversity

303. Terry Fankhauser, Executive Vice President, Colorado Cattlemen's Association

304. Thalia Keeton

305. Theodore Roosevelt Conservation Partnership

306. Tim Kelly

307. Timothy J. Maine

308. Timothy Krantz

309. Tina Burns

310. Tod Bacigalupi

311. Todd Van Dyke

312. Tom Jacobson

313. Tom Mowle

314. Tom Sobal, Quiet Use Coalition

315. Tony Greiner

316. Tony Greiner

317. Tripp Parks, Western Energy Alliance

318. Vanessa Mazal, National Parks Conservation Assoc.

319. Verene Posavad

320. Verne Huser

321. Veronica Rehne

322. Victoria Powell

323. Vincent Deshazer

324. Wendy Basham

325. Wendy Park, Staff Attorney, Center for Biological Diversity

326. Will Bledsoe, President, Colorado Independent Cattle Grower's Association

327. Will Carter

328. Will Pirkey

329. Wolfram Stumpf

Table C.1. Form Letter Submissions by Organization

Organization	Number of Submissions
Change.org/ Western Values Project	6,253
Citizens for Huerfano County	12
Conservation Colorado	184
Food and Water Watch	1,775
MoveOn.org	76
National Wildlife Federation	45
Salida Mountain Trails	5
Sierra Club	322
The Pew Charitable Trust	6,704

Organization	Number of Submissions
The Wilderness Society	635
Total	**16,011**