APPENDIX Q—RESPONSE TO PUBLIC COMMENTS ON THE DRAFT RMP/EIS

This appendix contains substantive public comments received during the public comment review period for the Draft Resource Management Plan (RMP)/Environmental Impact Statement (EIS) and the BLM responses. The process for analyzing and responding to each submission is described in chapter 5 of the Proposed RMP/Final EIS, Section 5.4.6. Several public commenters raised the same issues. For those often repeated themes, general comment responses (GCR) were developed to avoid repeating the same response. Table Q-1 contains the numbered GCRs.

Table Q-2 contains individual comments and responses, organized alphabetically by resource category, and within each resource category comments are organized alphabetically by commenter last name or organization. Where GCRs are used to respond to the comment, the GCR number is included in the response column. As the public comments included in Table Q-2 are taken from public letters, they may contain inconsistencies in terminology, acronyms, references, or inconsistent or inaccurate policy statements. These were not corrected in this appendix.

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Table Q-1. General Comments and Responses

GCR Number	General Comments	General Comment Responses
GCR#: 1	Please protect the area from oil and gas development. Decrease the amount of oil and gas exploration.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
GCR#: 2	BLM should incorporate protective measures for oil and gas development activities. The use of “green” or flareless well completions as a best management practice is too restrictive and technically and economically infeasible in some cases. References to BMPs should include consideration of technical and economic feasibility of implementation (green/flareless, directional drilling, surface disturbance reaches 10% of nesting habitat within a 4 mile radius of active lek).	Best management practices (BMP) are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. BMPs can include structural and nonstructural controls, specific operations, and maintenance procedures. BMPs can be applied before, during, and after activities to reduce or eliminate negative environmental impacts. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. While BMPs can be RMP decisions, they often contain a level of specificity that is best made or analyzed on a site-specific basis. BMPs may also be identified during an interdisciplinary process when evaluating site-specific management actions. Implementation and effectiveness of BMPs need to be monitored to determine whether they are achieving RMP goals and objectives. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. BLM seeks to develop and apply BMPs to mitigate impacts from mineral development, as well as other uses. In addition to the BMPs identified in the Draft RMP/EIS, BLM would consider implementation of other BMPs to address specific issues identified at the implementation level.
GCR#: 3	Comments arguing that developers use directional drilling or other specific methods. Specifically, "one of the most effect ways of [implementing additional mitigation], without reducing the amount of oil and gas developed, is the widespread application of a proven technology--directional drilling. This technology, by allowing the drilling of numerous wells from a single well pad, can dramatically reduce the number of well pads, and therefore, the undesirable impacts to the surface."	Directional drilling is considered where possible and is one of many mitigation measures used in the planning area. However, directional drilling is not always possible given geology and certain technical constraints.

GCR Number	General Comments	General Comment Responses
GCR#: 4	The RMP should close the Vermillion Basin and the six other proposed wilderness areas to off-road vehicle (ORV) use, withdraw them from mineral leasing and drilling, and classify them as right-of-way exclusion areas.	BLM is not required to protect all lands with wilderness characteristics. Some non-WSA areas in the LSFO contain wilderness characteristics, such as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. Non-WSA lands likely to have wilderness characteristics found in the LSFO are precluded from being managed under the IMP and the Section 603 non-impairment standard. However, BLM's revised Land Use Planning Handbook, H-1610-1, App. C.I.K. (effective 3/11/05), directs BLM to identify decisions to protect or preserve wilderness characteristics, or manage for other uses or values. BLM will decide through this planning process which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses. Portions of four areas in the LSFO, including the Vermillion Basin, have decisions that manage for their wilderness characteristics. Additionally, all seven Citizen Wilderness Proposal areas are closed to oil and gas leasing and OHV use in Alternative D. Alternative C has a mix of motorized vehicle closures of WSAs and only allowing vehicles on designated routes.
GCR#: 5	More should be done to develop alternative sources of energy (renewable energy) instead of focusing on oil and gas development.	Wind and solar energy are the primary potential sources for renewable energy generation. The development potential for biomass, hydropower, and geothermal renewable energy sources is minimal in the decision area. The Little Snake Draft RMP/EIS includes management actions that provide access for the development of renewable energy sources, however interest in developing renewable energy resources in the RMPPA has not occurred to date.
GCR#: 6	BLM must provide habitat protection for special status plants or rare plant species.	BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. In addition, before any surface disturbance activity, surveys would be conducted of potential habitat for all Colorado BLM Sensitive Species and rare plant communities. Should any such species or communities be found, site specific protective measures would be developed and implemented for the permitted activity as appropriate.
GCR#: 7	Comments where the commenter raises concerns about black-footed ferret protection measures, as well as concerns about white-tailed prairie dog protection (in favor of or against such protection).	The Endangered Species Act (ESA), as well as BLM policy, encourages management to protect special status species that are not currently listed as threatened or endangered. Federal agencies are also required to ensure that the actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of species listed as threatened or endangered or that adversely modify or destroy their critical habitat under the ESA. In addition, the ESA requires federal agencies to carry "…out programs for the conservation of endangered species and threatened species listed…" and "…shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act." As a nonessential experimental population in accordance with the 10(j) rule of the ESA, the black-footed ferret population would be treated as a

GCR Number	General Comments	General Comment Responses
		proposed threatened species. As such, federal agencies are to ensure that their actions do not jeopardize the continued existence of proposed species. White-tailed prairie dogs are a species of concern because of their important association with the endangered black-footed ferret. In addition, white-tailed prairie dog towns create unique vegetative conditions that provide potential habitat for the mountain plovers, black-footed ferrets, and burrowing owls, which are all special status species. Black-footed ferrets have not been reintroduced into the Little Snake RMPPA. BLM is to consider reintroduction into the area should it be determined that white-tailed prairie dog populations within the black-footed ferret reintroduction area could support a viable ferret population. Management actions that minimize/avoid disturbance of white-tailed prairie dog towns/colonies and potential ferret habitat are critical for the black-footed ferret and important for the Little Snake office to satisfy/comply with their ESA responsibilities and BLM policy regarding special status species.
GCR#: 8	Oil and gas exploration should be allowed to continue on BLM lands. Supports the preferred alternative for the LSFO RMP and does not want to restrict oil and gas development. Open up areas to oil and gas drilling.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will allow opportunities for mineral exploration and production while protecting resource values and resource uses. The management actions proposed under the Preferred Alternative will offer management flexibility to allow for acceptable levels of mineral development while ensuring that resource values and uses are protected.
GCR#: 9	Commenters suggesting certain areas should be designated ACECs, or that the Draft RMP/EIS fails to protect lands that contain significant cultural, geologic, scenic, recreational, and plant and wildlife habitat as ACECs. (e.g., “Any wildlife habitat eligible for ACEC status should be given that status.” “We support continued designation of Irish Canyon and urge BLM to retain designation of Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon as ACECs. Furthermore, [we support] consideration for all twelve eligible ACECs to protect essential habitat for sensitive plant species, cultural resources, scenic qualities and other values.) Commenters that assert that all potential ACECs should be carried forward into the Proposed RMP. (e.g., “Retain all existing ACECs.” “All 12 eligible areas of ‘critical environmental concern’ should be designated to protect essential habitat for imperiled plants, greater sage grouse and	In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary and evaluation of these ACECs is located in Appendix G of the Draft RMP/EIS. Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives. There is no requirement to carry forward all of the potential ACECs into the preferred alternative. BLM’s ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the Draft RMP/EIS. Alternative D analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the Proposed RMP/Final EIS will be provided in the ROD. The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in chapter 4 of the Proposed RMP/Final EIS.

GCR Number	General Comments	General Comment Responses
	prairie dogs.”)	
GCR#: 10	Establish a designated route system for the entire Little Snake Resource Area. It should eliminate or significantly reduce the size of the proposed Sand Wash Basin unrestricted motorized off-road vehicle "play" area.	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. Additionally, BLM route restrictions do not apply to valid existing routes, including county roads, permitted uses, and administrative uses. The county has jurisdiction over the county road system; BLM cannot close them. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. Colorado State BLM policy requires that all areas "limited to designated roads and trails" have completed Transportation Plans within 5 years of the completion of the RMP/ROD that identify designated routes. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. This transportation planning will be prioritized such that sensitive areas, including key habitat areas, will be completed first. Some areas of the RMPPA have already undergone a route designation process, with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. Concerning the size of the area open to cross country OHV use in the Sand Wash Basin, the Draft RMP/EIS considers a range of alternatives from designating most of the Sand Wash Basin open to cross country OHV use with a few areas limited to existing roads and trails (Alternative A), to limiting OHVs to designated routes in the entire basin (Alternative D). Chapter 4 presents the impacts from each decision. In Alternative C (Proposed RMP) of the Proposed RMP/Final EIS, the open area has been reduced in size from the Alternative C (Preferred Alternative) in the Draft RMP/EIS in response to the analysis and resource issues.
GCR#: 11	There are not enough restrictions on OHVs. OHV use causes irreparable harm to the environment and should be severely limited or eliminated. Please close more areas to OHV use.	The Draft RMP/EIS evaluated a broad range of alternatives of opportunities for non-motorized and motorized uses. The alternatives evaluated closing areas to OHV use on a range from 4% (Alternative B) to over 21% (Alternative D), not including other area limitations for OHV use, such as limiting use to existing roads and trails, or seasonally. Further, within five years of the completion of this RMP, a collaborative transportation planning process will establish a comprehensive designated route system for all areas where OHV use is limited to designated or existing roads and trails. This transportation planning will be prioritized such that sensitive areas will be completed first. Some areas of the RMPPA have already undergone a route designation process, with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. The management actions proposed under the Proposed RMP offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels use and recreation opportunities.
GCR#: 12	We oppose any alternative that would close significant tracts of public land to motorized recreation.	BLM manages public lands for multiple uses. The term "multiple use" as defined in FLPMA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction does not require that all uses be accommodated in all areas, but that certain areas can be managed for a given resource, where another area may be managed for a given use. The alternatives in the Draft RMP/EIS and Proposed RMP/Final EIS reflect this provision. Not all areas would be open to all

GCR Number	General Comments	General Comment Responses
		types of uses in the planning area or open in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources. The alternatives include seasonal and area closures and designations to ensure that resource values are protected while allowing for motorized use.
GCR#: 13	Cap surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	Restricting oil and gas activities to one well per 640 acres could be considered where possible. However, this practice is not always possible given geology and technical issues. In addition, best management practices (BMP) are applied on a site specific basis to reduce, prevent, or avoid adverse environmental or social impacts. BMPs need to be adapted to meet the site-specific requirements of a particular project as well as the local environment. They are incorporated into site-specific project proposals and supported by site-specific environmental analysis.
GCR#: 14	There is indication that the RFD has underestimated the number of future wells in the area. We believe a much greater number of wells will be drilled in the Little Snake due to nature of the reservoirs themselves. Production from tight gas reservoirs tends to have hyperbolic declines, that is, an initial high rate that rapidly declines.	The RFD was developed using a variety of information sources, including industry operators who are familiar with the geology of the region as well as the economic and other factors that must be considered in developing an RFD. If the threshold allowed in the RFD is approached in the future due to market demand, then BLM will revise the RFD and RMP.
GCR#: 15	Regarding the “areas with wilderness characteristics”, we see no precedent for such designations. "No more WSAs" is the court’s direction and a thinly veiled attempt to create a de facto WSA is probably a bad idea at a minimum, and illegal in the worst case. Certainly it will merit a serious legal challenge at the appropriate time. We urge you to drop this specific management prescription and manage for existing roads and trails.	BLM does not dispute that its authority to designate wilderness study areas (WSAs) under Section 603(c) of the Federal Land Policy and Management Act (FLPMA) expired in 1993. BLM’s authority for managing lands to protect or enhance values such as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM’s organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary’s authority to manage lands as necessary to “achieve integrated consideration of physical, biological, economic, and other sciences.” (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).) Further, FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use…” (FLPMA, Section 103(c) (43 U.S.C. §1702(c)).) FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, BLM’s Land Use Planning Handbook (H-1601-1) directs BLM to “identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.” The Utah v. Norton Settlement Agreement does not affect BLM’s authority to manage public lands. This

GCR Number	General Comments	General Comment Responses
		Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLMPA §202 land management process. Areas do not have to meet a minimum size requirement in order to contain wilderness characteristics, which has been clarified in the Proposed RMP/Final EIS. Through the land use planning process, BLM has considered all available information and land management tools to determine the best mix of resource use and protection that meets the FLPMA multiple use mandate. In the Little Snake RMP, this has resulted in emphasizing the protection of natural landscapes, opportunities for solitude, and/or opportunities for primitive recreation in some areas, while emphasizing other resource values and uses in other areas. All lands with wilderness characteristics are available for oil and gas leasing and OHV use in Alternative B.
GCR#: 16	Any roads and trails that existed at the time of the WSA designation apparently did not detract from the wilderness characteristics and their continued use should not either.	Although BLM is not required to close pre-existing vehicle ways within WSAs, it is within the discretion allowed by FLPMA to do so. Impacts from continued use on such ways within some WSAs were analyzed in the Draft RMP/EIS, as were impacts from closing the ways. Increasing use of such ways could increase the impacts beyond temporary intrusions on naturalness or loss of outstanding opportunities for solitude. Therefore, continued use on pre-existing ways will not necessarily result in the same impacts from OHV use over the past 20 years.
GCR#: 17	The Draft Plan and EIS does not disclose the implied water right associated with a Wild & Scenic River designation, and it does not disclose the impacts of such a water right upon senior or upstream water rights owners. BLM does not recognize that conditional water rights are valid existing rights.	An analysis of effects on water rights from WSR designation is already included in the Draft RMP/EIS (page 4-28). The Proposed RMP/Final EIS will expand this analysis, as well as potential impacts from a potential Congressional designation. The Proposed RMP/Final EIS has been revised to include a discussion of the implied right and its impacts. BLM does recognize that conditional water rights are valid existing rights, and the limited impacts to those water rights are disclosed in the Final EIS.
GCR#: 18	BLM's final suitability determination must take into account potential conflicts with future uses and state and local interests in the river.	BLM has added a section to Appendix D entitled, "Evaluation of Wild and Scenic River Suitability Criteria." In this section, BLM considers a series of suitability criteria for each stream segment determined to be eligible, including reasonably foreseeable potential uses of the Yampa River segments. BLM fully recognizes that water districts have conditional water rights that will rely upon land use authorization from BLM in the suitable stream segments for their eventual development and use. BLM also recognizes that Moffat County government has expressed its intent to use the suitable segments for long-term water supplies. BLM also recognizes that the State of Colorado has identified the Yampa River as critical to meeting the state's long-term water supply needs in process such as the Statewide Water Supply Initiative and the Interbasin Compact Process. BLM concluded that despite these water rights and planning efforts, there is not a current proposal to use the suitable segments for water supply that is backed up with financing plans, engineering plans, and water supply contracts. In addition, by reviewing the output from the Statewide Water Supply Initiative and Interbasin Compact processes, BLM concluded that such proposals are not likely to surface during the life of this plan. Rather, BLM concluded that during the next 20 years, water supply projects are likely to occur on tributaries to the Yampa River and in the headwaters of the Yampa River. In

GCR Number	General Comments	General Comment Responses
		addition, BLM concluded that out-of-basin diversions associated with future projects are not likely to be of a magnitude that the outstandingly remarkable values would be significantly diminished. For these reasons, BLM concludes that its suitability findings are not incompatible with future uses and state and local interests in the river. In the event that BLM assumptions about water development during the next 20 years are incorrect, BLM has built safety clauses into our suitability findings. BLM has committed to continuing review of the results of the Basin Roundtable and Interbasin Compact processes. BLM has also committed to considering a land use plan amendment if these processes identify a project within the suitable segments that is critical to the state's future water supplies.
GCR#: 19	The existence of substantial vested water rights in Yampa River Basin, both absolute and conditional in nature, directly conflicts with any interim Wild & Scenic River management by BLM, as well as any future Congressional designation of such segments. These water rights will further reduce Yampa River stream flows as water demands increase in the future.	If a river segment is not yet designated by Congress, BLM involvement in water rights processes would be triggered only if the water right applicant required access to BLM lands for development of the water right. BLM would not be able to object to the proposed water right based on injury to outstandingly remarkable values because BLM would have not yet quantified, via analytical studies, the precise amount of flow needed to support the outstandingly remarkable values. If Congressional designation were to occur, the only circumstances under which the federal right could impact existing absolute and conditional rights would be if BLM completes studies to quantify the amount of water needed to support the ORVs, BLM successfully adjudicates the water right in state water court, and an existing water right applies for a change that would injure BLM's water right, but that would not injure existing water rights on the Yampa River system.
GCR#: 20	BLM has failed to acknowledge or assess the extent to which sizable decreed water rights conditional water storage rights on Yampa River may be foreclosed or curtailed from future development if these segments are designated as Wild & Scenic. The water rights associated with Juniper/Cross Mountain Projects are reasonably foreseeable uses of the river segments and have not been adequately considered.	At this time, BLM has not received any information in the form of financing plans, engineering plans, or water supply contracts that would lead BLM to believe that a main stem dam project will be developed during the life of this planning document. BLM believes that the owners of these conditional rights will continue to maintain them diligently in Colorado Water Court, and continue to seek alternative methods for developing the water rights.
GCR#: 21	The Draft Plan and EIS lacks any analysis of the estimated costs of acquiring water rights that conflict with wild and scenic river designation. This includes the estimated costs of "taking" the conditional water rights associated with Juniper/Cross Mountain Project.	BLM disagrees that any compensable "taking" of water rights would occur if the suitable river segments are designated by Congress. Water rights consist of an allocation of a specific quantity of water under a specific priority date. Water rights do not incorporate any sort of implied right of access right to federal lands in a specific location, even if the decree specifies a location on federal lands. While it is impossible to forecast the specific conditions of a Congressional designation, if the segments were designated by Congress, any water rights holders in these segments would still retain the ability to change their conditional water rights for usage elsewhere within the Yampa River basin.
GCR#: 22	BLM should include language in the Final Plan that interim management of suitable segments shall be subject to immediate consideration of a land use plan	BLM believes that this type of language is not needed in the final plan, because BLM's existing planning manual already outlines the process for a land use plan amendment. Under these procedures, water rights owners may submit a request that BLM amend its land use plan at any time. However, the amendment request must be supported by several types of resources in order for BLM

GCR Number	General Comments	General Comment Responses
	amendment by BLM, if any Yampa River Basin water users seek to develop existing water rights pursuant to Colorado Water Court decrees.	to act promptly upon the request. First, BLM generally would not act upon such a request without a specific project proposal in hand. The requesting party would be asked to submit a detailed project proposal, including financing, engineering, and water supply contracts. Second, the party would be asked to submit a "purpose and need" statement explaining why the land use plan amendment is justified, and why the project is in the public interest. Third, the project proponent would be expected to pay for the costs of any environmental analysis and BLM staff needed to process the request. If these work products are in place, BLM could act promptly on the amendment request.
GCR#: 23	NSO and NGD must not apply to range improvements. Range improvements benefit water resources and should be allowed, within ¼ mile of water resource. Range improvements shouldn't be considered an Appendix M exception but an allowed use.	As indicated in the RMP (ES-13), BLM will consider range improvement developments for the purpose of improving diversity, condition, and sustainability consistent with the criteria established in Appendix E. The PRIA directs improvement of rangeland condition and provides for rangeland improvements including providing for habitat for wildlife. Exceptions to the NSO stipulation within ¼ mile of perennial stream will be allowed on a-case-by-case basis provided the proposed range improvement is compatible with the goals identified for water resources. In addition, the Proposed RMP/Final EIS has been revised to remove NGD and SSR stipulations from Alternative C. The reason BLM included surface disturbance restrictions in the Draft RMP/EIS was to be consistent between oil and gas and other uses. This still remains the intent of BLM and removing this decision in the land use plan does not affect BLM's ability to apply restrictions consistently for different uses. BLM can still be consistent at the implementation level, where it is easier to address actions on a case-by-case basis. BLM has all the authority it needs to protect surface resources with project-level NEPA and planning. Therefore, there is no need for an RMP-level decision. Surface disturbance restrictions created several unforeseen conflicts. Some reasons for the change include inconsistency between use restrictions, surface disturbance restrictions are confusing and undefined, they reduce flexibility needed to address resource concerns, they are unneeded, and not all uses are the same. No Ground Disturbance restrictions conflict with other restrictions. NGD designations were in conflict with ROW restrictions and surface coal mining restrictions. It was unclear what actions qualify as a "permitted surface disturbing activity." Would this include actions such as re-seeding after a wildfire? What about a sage grouse guzzler? This ambiguity could lead to confusion and litigation. Depending on how permitted surface disturbing activities were defined, these restrictions could severely limit BLM's flexibility in addressing resource needs. Umbrella surface disturbance restrictions are unneeded because BLM already has restrictions for oil and gas, coal, mineral materials, nonenergy leasables, realty actions, OHVs, and visual resources. Finally, although permitted surface disturbing activities may all disturb the surface in some way, the effects are not the same. Impacts have different scope, intensity, and duration.
GCR#: 24	RMP/EIS management actions encroach on authorities of state to regulate water resources in Colorado; Other rules and regulations are in place to protect water resources.	BLM derives its authority to manage water quality in federally owned land from the 1976 FLPMA. As indicated in Section 2.5.3 of the RMP/EIS, the 1976 FLPMA directs and requires BLM to comply with State water quality standards, mandated under the Federal Water Control Act (Clean Water Act) of 1977 and its subsequent amendment in 1987, and to manage public land so as to preserve and protect certain lands in their natural conditions. BLM is required to maintain water quality where it presently meets EPA-approved State of Colorado water quality standards and to improve water quality on public lands where it does not meet standards defined by Section 303(d) of the Clean

GCR Number	General Comments	General Comment Responses
		Water Act. Management actions and strategies to achieve desired water quality conditions identified in the RMP/EIS for the planning area will be conducted in conformance with various regulations in the CWA, the Colorado Water Quality Control Act, Colorado water quality standards and guidelines, and the FLPMA.
GCR#: 25	Management actions that require ¼ mile NSO from perennial streams is excessive. Criteria for exception are so vague, ¼ mile NSO is not enough to protect fish and wildlife dependent on this resource.	Management actions identified for water resources are selected to minimize impact from management actions for other resource programs. The NSO stipulation of ¼ mile of perennial streams was designed to protect and improve the surface water quality and integrity of the streams and their associated riparian values, including but not limited to biological communities dependent on this resource and human and economic values derived from stream uses. BLM allows for NSO exceptions, modifications, or waivers consistent with the criteria described in Appendix E, which would be addressed on a case-by-case basis depending on site-specific conditions. Based on site-specific conditions or uses a 0.25 mile NSO may not be required to provide sufficient protection to the water quality and other resources that use the water resource.
GCR#: 26	Impacts of WSR designation to existing and future water rights are not adequately analyzed in the RMP/EIS Impacts of interim WSR classification on future water rights and ability of local governments to develop future water projects in the planning area are not adequately identified and analyzed. BLM does not understand the nature of conditional water rights and conflict they pose with WSR designation to current and future water projects currently being considered (projects will inundate BLM lands, in particular segments of Yampa River) Interim WSR management actions could result in denial of any water resource projects for which BLM's consent will be required, if BLM must prohibit all water control infrastructure to preserve free-flowing nature of the eligible segments. BLM must include additional protective language in the RMP/EIS under which BLM will immediately reconsider and seek amendment of its land use plan in the event that any water users seek to develop decreed water rights in the	As discussed in Section 3.1.4 of the Draft RMP/EIS, BLM is aware of the scarcity of water and increasing demand for water use in the planning area. BLM evaluated and considered potential impacts to Wild and Scenic River-related decisions, working with stakeholders to ensure that it has fully considered any effects of decisions regarding Wild and Scenic Rivers. Comments received from several stakeholders during the WSR evaluation conducted in 2005 were incorporated in the RMP/EIS. However at this point of the planning process, BLM is merely analyzing the segments to identify outstandingly remarkable values (ORV) and to identify whether or not a WSR designation by Congress is the appropriate method to protect these values. Nevertheless, the effect on water rights or in-stream flows related to suitability findings made in a land use plan decision will be minimal. Even if congress were to designate rivers into the National Wild and Scenic Rivers system, any such designation would have no effect on existing water rights. This is because the WSRA does not provide any additional authority or requirements for BLM to participate in water rights process. Section 13 (b) of the Wild Scenic Rivers Act states that jurisdiction over water rights for a designated river is established by principles of law. The State of Colorado has jurisdiction over water and has the responsibility for allocation of surface water within the state. Any agency action to protect ORVs in the suitable segment are restricted to authorities the agency already possess under FLMPA. BLM fully recognizes that water districts have conditional water rights that will rely upon land use authorization from BLM in the suitable stream segments for their eventual development and use. BLM also recognizes that Moffat County government and other interests have expressed their intent to use the suitable segments for long-term water supplies. BLM also recognizes that the State of Colorado has identified the Yampa River as critical to meeting the state's long-term water supply needs in process such as the Statewide Water Supply Initiative and the Interbasin Compact Process. BLM concluded that despite these water rights and planning efforts, there is not a current proposal to use the suitable segments for water supply that is backed up with financing plans, engineering plans, and water supply contracts. In addition, by reviewing the output from the Statewide Water Supply Initiative and Interbasin Compact processes, BLM concluded that such proposals are not likely to

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	Yampa River Basin.	surface during the life of this plan. For these reasons, BLM concludes that its suitability findings are not incompatible with future uses and state and local interests in the river. Although the Wild and Scenic Rivers Act implies a federal reserved right for designated rivers to keep it free-flowing, it doesn't require or specify any amount, and instead establishes that only a minimum amount for purposes of the Act can be acquired. And while BLM is obligated to manage and protect the free-flowing character, the identified ORVs of eligible or suitable rivers, and their tentative classification, this protection only occurs at the point of eligibility determination. As explained in Section 4.3.3.3, BLM involvement in water rights processes would be triggered only if the water rights applicant required access to BLM lands for development of water rights, and also if the proposed water right would injure an existing BLM water right decreed for other purposes. Additionally, BLM determination of suitability does not invoke additional involvement by BLM in state-based water rights processes that would be required for proposed water projects. In fact, any land use plan decision is always subject to valid existing rights. For future projects with plans and funding that would require land use authorization, BLM has the authority to change the determination via a land use plan amendment, and stakeholders may ask BLM to change its suitability findings based on new information and expanded public demand for development of water supplies. In the event that BLM assumptions about water development during the next 20 years are incorrect, BLM has built safety clauses into our suitability findings. BLM has continuing review of the results of the Basin Roundtable and Interbasin Compact processes. BLM has also committed to considering a land use plan amendment if these processes identify a project within the suitable segments that is critical to the state's future water supplies.
GCR#: 27	Any comment that simply voices support to manage all eligible wild and scenic river segments as suitable.	All identified streams were given careful consideration in this planning and decision making process. The WSR recommendations you support were one of the alternatives analyzed and considered in preparing the final decisions.
GCR#: 28	I am opposed to any Wild and Scenic designation of the Yampa River. It will put a burden on the water users and undue stress on the adjoining land owners upstream and downstream.	All identified streams were given careful consideration in this planning and decision making process. A case-by-case evaluation of potential impacts resulting from a proposed action must be made to ensure all eligible rivers are not limited from being considered for suitability among the range of RMP alternatives, thus eliminating the opportunity to prejudice the decision. An evaluation of each river is provided in Appendix D along with a more thorough discussion of how suitability considerations are applied to each eligible river.
GCR#: 29	BLM's preferred alternative does not protect all five of the resource area's eligible Wild and Scenic River segments. Beaver Creek and Vermillion Creek are not designated as "suitable" and thus will not be protected. The three Yampa River segments are open to oil and gas leasing. BLM should preserve all exceptional stretches of the Yampa River, Vermillion Creek, and Beaver Creek to protect their	This information was considered during the Little Snake Field Office review of potential eligible rivers for the identification of outstandingly remarkable values. Where rivers were not found eligible, much of the information pertaining to river characteristics is also used as a consideration for determining their suitability. In some cases, however, an interdisciplinary team of resource specialists disagreed with the information or, more often, the significance of the information. An evaluation of each river is provided in Appendix D along with a more thorough discussion of how suitability considerations are applied to each eligible river.

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	wild characteristics, renowned rafting and recreation opportunities, and critical habitat for endangered fish species.	
GCR#: 30	Comments arguing there is inadequate analysis of impacts to water rights from WSR suitability findings.	BLM has coordinated with all cooperators to ensure that we fully consider any effects of decisions regarding Wild and Scenic Rivers. There is absolutely no effect whatsoever on water rights or in-stream flows related to suitability findings made in a land use plan decision, barring congressional action. Even if Congress were to designate rivers into the National Wild and Scenic Rivers System, any such designation would have no affect on existing, water rights. Section 13 (b) of the Wild and Scenic River Act states that jurisdiction over waters is determined by established principles of law. Although the Wild and Scenic Rivers Act implies a federal reserved water right for designated rivers, it doesn't require or specify any amount, and instead establishes that only the minimum amount for purposes of the Act can be acquired. For congressionally designated rivers, BLM may assert a federal reserved water right for appurtenant and unappropriated water with a priority date as of the date of designation (junior to all existing rights), but only in the minimum amount necessary to fulfill the primary purpose of the reservation. In practice, however, federal reserved water rights have not always been claimed if alternative means of ensuring sufficient flows are adequate to sustain the outstandingly remarkable values. BLM is fully evaluating and considering potential impacts to Wild and Scenic River- related decisions in this planning process. A discussion of impacts resulting from possible Congressional designation of suitable streams has been added to chapter 4 of the Final EIS, and Appendix D is modified to include a more thorough discussion of how the suitability considerations are applied to each eligible river.
GCR#: 31	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Mitigation Measures 4. Management of mid to late summer brood-rearing areas should encourage forb regrowth while maintaining at least a 6 inch residual grass height with taller (> 24 inches in height), live sagebrush of > 15 % canopy cover in close (< 200 yds) proximity for use as escape cover. This is the minimum needed to maintain sage-grouse populations. Page 2-24- Greater Sage-grouse- Within this section we believe Alternative D, as well as the consideration and application of additional restrictions/prescriptions, is needed to provide the additional needed protection that this species needs to decrease the likelihood that it trends towards becoming federally listed.	To ensure proper and effective management of the different life stages and requirements of sage-grouse, BLM is currently implementing, and will continue to implement, best management practices identified in both the 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan, and the 2007 Colorado Greater Sage-Grouse Conservation Plan. These plans were based on the best available scientific information. Additional consideration of local trends in populations and habitats of sage grouse will take place within local conservation planning efforts. In addition, BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the RMP EIS. BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. Most studies show that greater sage-grouse require buffers for nesting and breeding habitat. BLM, in partnership with CDOW, has developed habitat management actions to improve and maintain sagebrush habitat functionality by limiting fragmentation. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority sagebrush habitats. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed Plan with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development with a 5% disturbance limitation and a strategy to leave large blocks of

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	Emerging science on greater sage-grouse has reached the level where action should be taken now to avoid further impacts. We currently know that oil and gas production, as it has been done in the past, has had major impacts on sage-grouse populations. Oil and gas production carried out the same way as in the past could lead to extirpation of populations inside the project area, based on studies conducted by Hollaran 2005 and Naugle et al. (2006a, b).	undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed Plan also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated would have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Greater sage-grouse crucial winter habitat would be closed from December 16 to March 15. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
GCR#: 32	Alternates C and D of the Little Snake Resource area are far too restrictive to allow the full concept of multiple use to be effective for the citizens of the area and the nation. I object to: Your concessions to hunters in the wildlife protection portions of the RMP ignores the needs of other travelers and livestock interests. The current federal and state wildlife management programs have proven to be ineffective so why add more restrictions.	BLM cannot preferentially manage for any one resource. BLM is mandated to manage for multiple use of public lands. The term “multiple use” as defined in FLMPA means “the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people.” This direction indicates that not all uses can be accommodated in all areas. The Alternatives in the Draft RMP/EIS reflect this provision. Not all areas would be open to all types of uses in the planning area. Additionally, not all areas would be open to uses in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources. Wildlife stipulations are based on the best available scientific information.
GCR#: 33	The large closures to over-the-snow vehicles (OSV) are not necessary and would severely affect the winter recreation opportunities of this entire area of the state of Colorado, as well as the economy. There is no analysis of the OSV decisions. There also needs to be a clarification on the distinction between OHV closures and how/if they effect OSV throughout the document. Additionally, there should not be any restrictions on winter access routes to or within the Bears Ears District of Routt National Forest and documented or current roads should not be included in BLM closures. Closure of these roads would prevent access to areas of winter	BLM has revised chapters 2, 3, and 4 to more clearly define OSV management and impacts. OSV travel could disturb animals during critical winter months. However, when snow reaches a certain depth (a depth at which OSV can safely travel in the area), big-game typically move to other areas. Therefore, BLM has revised the OSV decisions for the Proposed RMP/Final EIS Alternative C to accommodate both OSV use and to protect wintering wildlife. The new decision for Alternative C will be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface estate, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions would not apply to valid existing routes, including county roads, permitted uses and administrative uses. The impacts from this decision, as well as the OSV closures from Alternative D, have been accentuated in chapter 4 of the Proposed RMP/Final EIS. BLM has also reviewed and revised uses of the term “OHV” throughout the document, including statements or insinuations that non-motorized vehicles are also OHVs. The Bears Ears District portion of the planning area is managed by the USFS and is outside of BLM jurisdiction.

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	snowmobiling and family recreation.	
GCR#: 34	If the plan must allow leasing, it should require special, higher-value bonds on leases, as permitted by BLM regulations, based on the reasonable cost of restoration associated with the sensitive wildlife habitat in the area and the restoration standards in the RMP.	The issue of bonds on leases is beyond the scope of this RMP. The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
GCR#: 35	Removing oil and gas leasing from an area is a 'withdrawal' not a mere 'deferral for the life of the RMP' as BLM claims. 'Withdrawals' must be reported to congress with justification.	The Little Snake RMP would close areas to oil and gas leasing. Those areas would be closed to oil and gas leasing because the Little Snake Field Office determined that it is not reasonable to apply a no surface occupancy (NSO) stipulation. Withdrawals are defined by FLPMA §103(j) as follows: The term 'withdrawal' means withholding an area of Federal land from settlement, sale, location, or entry, under some or all of the general land laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area or reserving the area for a particular public purpose or program; or transferring jurisdiction over an area of Federal land…from one department, bureau or agency to another department, bureau or agency 43 U.S.C. § 1702(j). The terms "settlement," "sale," "location," or "entry" are all terms contemplating transfer of title to the lands in question, particularly the patenting, or potential patenting, of lands out of Federal ownership into the hands of private parties based on the provisions of the General Mining Law of 1872, as amended, the various Homestead Acts, and other general land law. It is inapplicable to mineral leasing occurring under the Mineral Leasing Act of 1920 (MLA). A Federal mineral lease sale is not a "sale" of public land under Section 203 of FLPMA, and a closure to leasing is not a "withdrawal" as described in Section 204 of FLPMA. Therefore, BLM was not required to complete the procedures associated with a withdrawal when it decided to close areas to oil and gas leasing in the Little Snake RMP.
GCR#: 36	Mineral withdraws must identify the value of resources lost. What is the value of the deferred minerals?	The potential of mineral resources is considered when recommending an area for withdrawal. Identifying a monetary value of minerals recommended for withdrawal is not a requirement.
GCR#: 37	The latest technologies in footprint reduction are not included in the Draft RMP/EIS.	Footprint reduction technologies can be applied on a site specific basis to reduce, prevent, or avoid adverse environmental. These technologies do not apply to all situations. They need to be adapted to meet the site-specific requirements of a particular project as well as the local environment and are incorporated into site-specific project proposals and supported by site-specific environmental analysis.
GCR#: 38	There is little documentation in the Draft EIS supporting the contention that the LSRA has engaged in robust consultation with Indian tribes to this point, or that the consultation letters inviting participation specifically identified cultural or religious	The decision regarding which tribes to consult with was based on a map of cultural affiliation provided by the Colorado Commission of Indian Affairs. Since the Draft RMP/EIS has been published, BLM has offered in-person visits to the Tribal Business Council of the Southern Ute, Ute Mountain Ute, Eastern Shoshone, and the Uintah-Ouray Ute Tribes. The only response was from the Uintah-Ouray Ute Tribe, and the Field Office Manager presented the Draft RMP/EIS to them in a February 2007 Tribal Business Council meeting. In addition, the field office archaeologist has met face-to-face with Eastern

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	properties of significance that would be relevant to the tribes' participation. As articulated in 2007 by the Interior Board of Land Appeals (IBLA 2004-124) in Southern Utah Wilderness Alliance v UT 055 et al., meaningful consultation with Indian tribes involves more than sending letters inviting their participation. Efforts by LSRA staff to consult with the identified tribes regarding the Draft EIS may have been adequate, although meaningful consultation efforts are not clearly articulated in the Draft EIS and there is no indication BLM identified historic properties or sacred sites of significance to the tribes. The failure to involve a broader range of tribes would also minimize BLM's claims of meaningful consultation. LSRA staff has indicated their intent to brief tribal leaders in the near future regarding the Draft EIS to seek greater tribal participation. These briefings are certainly appropriate. However, the initiation of these briefings three years after initial planning documents were formulated seems inconsistent with the spirit of Executive Order 13175 requiring "timely input by tribal leaders," or with 36 CFR 800.2(ii)(A), that "Consultation should commence early in the planning process, in order to identify and discuss relevant preservation issues and resolve concerns about the confidentiality of information on historic properties." In light of these considerations it is recommended: The LSRA immediately revise its consultation policies to include the broadest possible range of tribal interests, and that this range include, at a minimum, Puebloan, Plains, Athapaskan and Numic groups, as identified in Colorado Historical Society Document No.	Shoshone, Northern Ute, and Ute Mountain Ute representatives to discuss the Draft RMP/EIS. A summary of all consultation efforts with Native American Tribes has been updated in chapter 5 of the Proposed RMP/Final EIS.

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	1550. Particular efforts should be directed at consultation with the Hopi and Zuni tribes, which have historically claimed affiliation with Fremont peoples. In accordance with IBLA Ruling 2004-124, meaningful consultation should include more than form letters and cursory phone calls to invite participation. If necessary, a final EIS should be delayed until meaningful and comprehensive consultation with all relevant tribes is initiated and tribal concerns are properly addressed in the RMP.	
GCR#: 39	BLM cannot properly manage cultural resources it does not know exist. There haven't been enough cultural inventories with which to make decisions or perform and adequate impacts analysis. BLM has applied the McDonald and Metcalf (2006) predictive model for cultural site sensitivity throughout the Draft EIS, while admitting that the sample of known sites used to create the model may be statistically invalid. Just because that was the only model available does not make it okay to use a statistically invalid model. BLM cannot properly manage cultural resources it does not know exist, and hence the absence of a statistically valid sample makes it impossible to adequately consider potential impacts to unknown cultural resources. Instead, the model is little more than a de facto corroboration of the failure of the BLM over the past two decades to take seriously its Section 110 responsibilities to implement a proactive preservation program for the identification, evaluation and National Register nomination of historic properties under its jurisdiction or control.	In preparing the Draft RMP/EIS, BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is the result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. In addition, a land use plan decision is not required to perform Section 110 inventories. BLM understands its Section 110 responsibilities and seeks to perform Section 110 inventories as staffing and budget allows.

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GCR#: 40	BMPs are needed to protect a given resource. BMPs should be made mandatory to protect a given resource.	Best management practices (BMP) are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. BMPs can include structural and nonstructural controls, specific operations, and maintenance procedures. BMPs can be applied before, during, and after activities to reduce or eliminate negative environmental impacts. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. While BMPs can be RMP decisions, they often contain a level of specificity that is best made or analyzed on a site-specific basis. BMPs may also be identified during an interdisciplinary process when evaluating site-specific management actions. Implementation and effectiveness of BMPs need to be monitored to determine whether they are achieving RMP goals and objectives. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. BLM seeks to develop and apply BMPs to mitigate impacts from mineral development, as well as other uses. In addition to the BMPs identified in the Draft RMP/EIS, BLM would consider implementation of other BMPs to address specific issues identified at the implementation level.
GCR#: 41	It is unclear when BLM will decide to require versus encourage BMPs. This offers operators little certainty. --OR-- Comments that suggest specific BMPs that should be included in the RMP.	Best management practices (BMP) are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. As such, BMPs will always be applied, but which BMP will be applied where will be addressed on a case-by-case basis during implementation. BMPs can include structural and nonstructural controls, specific operations, and maintenance procedures. BMPs can be applied before, during, and after activities to reduce or eliminate negative environmental impacts. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. While BMPs can be RMP decisions, they often contain a level of specificity that is best made or analyzed on a site-specific basis. BMPs may also be identified during an interdisciplinary process when evaluating site-specific management actions. Implementation and effectiveness of BMPs need to be monitored to determine whether they are achieving RMP goals and objectives. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. BLM seeks to develop and apply BMPs to mitigate impacts from mineral development, as well as other uses. In addition to the BMPs identified in the Draft RMP/EIS, BLM would consider implementation of other BMPs to address specific issues identified at the implementation level.

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GCR#: 42	It is recommended that BLM impose a requirement for maximum surface well spacing. Note this applies only to surface spacing, and is independent of downhole, or subsurface well spacing. One of the following two spacing rules should be established: At a minimum, 320 acre, or two well pads per section. This requirement is a logical extension of the already established 160 acre spacing in the Piceance Basin northwards into the Little Snake area. 2. One well pad per section [surface spacing near or at 640 acres]. This would. re-establish the drilling practices of the past decades. I will show it is feasible from a technical and economic standpoint There are several advantages to this proposal: 1. Maximum protections to the surface, while at the same time allowing full production of oil and gas 2. Facilities would be concentrated, allowing economies of scale. 3. Mitigation efforts would stay ahead of activity 4. Field development could proceed in an orderly fashion. Industry could plan well pads in advance, thereby reducing costs. Note that although these "rules" would establish the normal surface spacing, they could still be adjusted where industry shows them to be technically infeasible, using established BLM procedures.	Imposing a surface spacing limitation can result in increased habitat fragmentation and can be counter-productive to maintaining sagebrush habitat “sanctuaries,” which recent studies have shown are critical to greater sage-grouse and other sagebrush-obligate species. To develop a play, oil and gas operators would be forced to construct a well pad and associated roads and pipelines every 320 or 640 acres. This would result in a network of surface disturbance with oil and gas infrastructure on every square mile, with few large areas devoid of oil and gas-related disturbance. Sage-grouse studies have shown that birds could be affected by surface spacing of one well pad per 640 acres. Therefore, a network of well pads at such spacing could result in impacts to sage-grouse throughout the entire development area. BLM believes a more appropriate strategy to reduce habitat fragmentation and promote large blocks of unfragmented habitat is to limit surface disturbance to a certain percentage of a lease or project area. Additionally, the operator would be required to illustrate strategy for reducing habitat fragmentation and leaving large blocks of sagebrush habitat undisturbed in a Plan of Development. Under this approach, the operator has the flexibility to cluster development in one area and leave adjacent areas undisturbed. Surface spacing limitations could be appropriate in some situations. BLM has the ability to require that well pads are spaced at a certain density at the implementation level. However, mandating a spacing limitation could result in substantial habitat fragmentation.
GCR#: 43	Since private property boarders both sides of the Yampa in three locations spaced approximately 2 miles apart throughout Segments 1 and 2 of the WSR proposal, and considering Colorado does not have ‘right-to-float’ laws, Moffat County requests BLM re-analyze suitability if the private landowners block floating access through the segments proposed as wild	As part of the ongoing revision of the Little Snake RMP, the LSFO considered if the eligible segments of the identified rivers are “suitable” for recommendation to Congress for inclusion in the NWSRS. Appendix D has been modified to include a complete analysis of the suitability criteria. The information provided in this comment regarding suitability was considered during the suitability analysis that was completed between publication of the Draft RMP/EIS and the Proposed RMP/Final EIS.

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	and scenic.	
GCR#: 44	The Draft EIS failed to analyze impacts from the over-the-snow (snowmobiling) decisions. Therefore, the effects from closing up to 861,030 acres to OSVs are missing, understated, or both. The final EIS must include better information in respect to this issue in order to comply with the requirements of NEPA.	BLM has revised chapters 2, 3, and 4 of the Proposed RMP/Final EIS to specifically address and clarify OSV management and impacts. OSV management for the Proposed RMP (Alternative C) has been revised to allow OSV use only in areas where snow depth is equal to or greater than 2 feet. BLM met with local snowmobiling user groups and has added use information to chapter 3, as well as adding and clarifying impacts from OSV use and restrictions on such use in chapter 4.
GCR#: 45	BLM should increase the availability of federal lands for wireless communications infrastructure in accordance with numerous federal laws and policies.	BLM will comply with all laws and regulations. The following goal is included on page 2-97 of the Draft EIS: "Provide access for the development of transportation routes, utilities, transmission lines, communication sites, and other uses, in an environmentally responsible manner." The management action included in the Proposed RMP regarding development of communication sites is as follows: "All sites would be open except in ROW exclusion areas. Priority would go to collocation of facilities and use of existing sites to minimize number of total sites. Use, where possible, best available technologies, such as tower guy wires, to reduce migratory bird mortality." This goal and management action addresses the need and BLM's commitment to provide for the development of communication sites (which include wireless-related communication sites).
GCR#: 46	Among the more specific concerns identified in the Draft RMP/EIS include the absence of a clearly stated intent to initiate Section 106 compliance prior to the designation of ORV routes and open play areas. The Draft EIS is equivocal as to whether the Class III inventory of the affected areas, site evaluations, site mitigations and formal reporting should be completed prior to allowing OHV travel in open OHV areas or along designated routes. Vehicular traffic may subsequently expose cultural materials that were not visible at the time the Class III inventory was conducted, enhancing the need for ongoing monitoring and future data recovery. This will require a significant ongoing commitment of limited BLM resources. Furthermore, data recovery is an adverse effect that must be properly considered through the Section 106	BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. A. Class III inventory is not required prior to designations that (1) allow continued use of an existing route; (2) impose new limitations on an existing route; (3) close an open area or travel route; (4) keep a closed area closed; or (5) keep an open area open. B. Where there is a reasonable expectation that a proposed designation will shift, concentrate or expand travel into areas where historic properties are likely to be adversely affected, Class III inventory and compliance with Section 106, focused on areas where adverse effects are likely to occur, is required prior to designation. C. Proposed designations of new routes or new areas as open to OHV use will require Class III inventory of the Area of Potential Effect and compliance with Section 106 prior to designation. Class III inventory of the APE and compliance with Section 106 will also be required prior to identifying new locations proposed as staging areas or similar areas of concentrated OHV use. D. Class II inventory, or development and field testing of a cultural resources probability model, followed by a Class III inventory in high potential areas and for specific projects, may be appropriate for larger planning areas for which limited information is currently available. Additionally, language in Addendum 1 to the Colorado Protocol identifies inventory requirements,

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	process.	defines the area of potential effect (APE), outlines compliance with Section 106 when considering comprehensive travel and transportation management planning, and addresses monitoring requirements. BLM will comply with the direction in the Protocol during formal consultation with SHPO and future route designations. In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the ROD is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the ROD. Based on consultation efforts with SHPO there was a change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. The Draft RMP/EIS limits OHV designations to area designations, which are decisions that identify lands as either open to cross country OHV use, limiting OHV use in some manner (usually limiting to existing or designated routes), or closed to OHV use. The designation of specific OHV routes in the limited OHV category is an implementation level decision. No routes are being proposed for designation in the Draft RMP/EIS or the Proposed RMP/Final EIS. The Proposed RMP/Final EIS has been revised to clarify the OHV decisions being made. It has also been revised to remove the decisions and impacts related to managing cross-country OHV use through adaptive management. Subsequent travel management planning that results in route designations will follow the amendment to the Colorado Protocol with SHPO and will not be addressed in this document. As noted in the Draft RMP/EIS, if transportation planning and the associated Section 106 are not completed there would be impacts. However, both of these processes are being performed. As determined through the consultation process, if there are cultural sites in the open area that would be impacted by continued OHV use, mitigation would be developed during the Section 106 consultation process.
GCR#: 47	The proposed actions, specifically the South Sand Wash OHV Play Area and the proposed OPEN areas, will cause impacts to cultural resources present in these areas. This is not adequately discussed nor is an analysis provided to fully understand the cultural impacts this will cause. There is no NEPA environmental analysis, EA, provided in this document that covers the seven critical elements for	The Draft RMP/EIS identifies potential impacts to cultural resources in the South Sand Wash area in Section 4.3.9.3. These impacts have been updated to reflect the revised size of the South Sand Wash SRMA, as well as more recent cultural resource inventories. An analysis of the impacts of OHV use on cultural resources is included in chapter 4 of the Draft EIS, including estimating the number of sites that could be damaged by “open” OHV use based on the cultural sensitivity maps (maps 3-23 and 3-24), ranging from 9,347 estimated sites under Alternative B to 157 estimated sites under Alternative C to 0 sites under Alternative D. This analysis included an analysis of impacts on all the "critical elements" identified in BLM's NEPA handbook and regulations. Additionally, the adaptive management component of transportation management has been removed in the Proposed RMP/Final EIS.

GCR Number	General Comments	General Comment Responses
	such a proposal. This proposal will result in hundreds of eligible to the National Register of Historic Places cultural resources receiving irreversible, irretrievable, cumulative impacts to known and yet-to-be recorded sites and significant data loss. This is not discussed or analyzed at all in the document. In addition, LSFO has not provided a clearly stated rationale for not following established NEPA and Section 106, Native American Consultation, analysis, mitigation and protection of cultural resources for these proposed projects. LSFO instead has proposed a new method/policy: an after-the-ROD is signed 5 year plan to address cultural resources. This is not a Colorado Bureau of Land Management Policy for project specific NEPA EA analysis or Section 106 Native American Consultation processes. The adaptive management component of the transportation planning is not consistent with any existing BLM policies.	BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). These documents identify inventory requirements, define the area of potential effect (APE), outline compliance with Section 106 when considering comprehensive travel and transportation management planning, and addresses monitoring requirements. BLM will comply with the direction in these documents during formal consultation with SHPO and future route designations. In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the ROD is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the ROD. Based on consultation efforts with SHPO there was a change in the approach noted in the Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. Concerning consultation efforts with Native American tribes, BLM recognizes consultation has not concluded. As the Proposed RMP solidified while developing the Final EIS, consultation moved from discussions of conceptual issues to consultation on actual proposed decisions. Since the Draft RMP/EIS has been published, BLM has offered in-person visits to the Tribal Business Council of the Southern Ute, Ute Mountain Ute, Eastern Shoshone, and the Uintah-Ouray Ute Tribe. The only response was from the Uintah-Ouray Ute Tribe, and the Field Office Manager presented the Draft RMP/EIS to them in a February 2007 Tribal Business Council meeting. In addition, the field office archaeologist has met face-to-face with Eastern Shoshone, Northern Ute, and Ute Mountain Ute representatives to discuss the Draft RMP/EIS. A summary of all consultation efforts with Native American Tribes has been updated in chapter 5 of the Proposed RMP/Final EIS. BLM will finalize consultation efforts with affected tribes prior to signing the ROD.

Table Q-2. Individual Comments and Responses

Category	Commenter	Comment	Response
Air Quality	Environmental Protection Agency (EPA), Region 8	The DEIS does not mention the emissions of greenhouse gases from activities on the, RMPPA. We recommend that BLM encourage oil and gas lessees to participate in EPA's Natural GasSTAR program, Through the Program (www.epa.gov/gasstar); EPA works with companies who produce, process, transmit, and distribute natural gas to identify and promote the implementation of cost-effective technologies and practices to reduce emissions of methane, a potent greenhouse gas.	A discussion of climate change and impacts to climate was added to the Proposed RMP/Final EIS.
Air Quality	Environmental Protection Agency (EPA), Region 8	Additional Technical Air Quality Comments (from the original DEIS): Page 3-11: In the last paragraph on page 3-11, BLM states that the Colorado Department of Public Health and the Environment (CDPHE) has adopted the National Ambient Air Quality Standards (NAAQS) "therefore there are no ambient air quality standards specific to Colorado." This statement should be revised. The CDPHE has adopted standards which differ from the NAAQS. We recommend consulting with the CDPHE regarding interpretation of the Colorado standards.	The Proposed RMP/Final EIS has been revised to reflect this comment.
Air Quality	Environmental Protection Agency (EPA), Region 8	Additional Technical Air Quality Comments (from the original DEIS): Table 1-6/Appendix I: This table correctly lists the annual 24-hour primary and 3-hour secondary NAAQSs for sulfur dioxide (S02) in parts per million (0.03, 0.14 and 0.50, respectively). However, the conversion of these standards to parts per billion (ppb) presented in the table does not appear to be correct. Please revise the table or explain the apparent discrepancy.	The Proposed RMP/Final EIS has been revised to eliminate the errors in the table.
Air Quality	Environmental Protection Agency (EPA), Region 8	Additional Technical Air Quality Comments (from the original DEIS): Page I-9 Appendix I: This page refers to ozone monitoring on the Ute Mountain Ute Reservation. We believe this reference is referring to the stations operated at Bondad and Ignacio on the Southern Ute Reservation. If this is correct, please revise.	The Proposed RMP/Final EIS has been revised to reflect this comment.
Air Quality	Environmental Protection Agency (EPA), Region 8	Additional Technical Air Quality Comments (from the original DEIS): Ozone Impacts: EPA recommends that the EIS and ROD state how BLM would mitigate potential ozone impacts, if it becomes a problem, as it has in neighboring areas.	It is inappropriate to suggest that hypothetical analysis assumptions should be made requiring mitigation measures in the Records of Decision of either the Little Snake RMP or “in all permits.” Future quantitative air pollutant dispersion modeling analysis must be performed based on actual oil and gas proposals, demonstrating adverse air quality impacts are likely, as well as an evaluation of potential mitigation measures needed to reduce those predicted impacts, before any “requirements”

Category	Commenter	Comment	Response
			are considered to be included in any Record of Decision.
Air Quality	Environmental Protection Agency (EPA), Region 8	Additional Technical Air Quality Comments (from the original DEIS): Visibility: The visibility table shows visibility impairment greater than 1.0 dv in two Class 1 areas -the Black Canyon of the Gunnison and Mt. Zirkel Wilderness (Table 4-59. page 4-229). However, the text below the table indicates that there is an impact greater than 1.0 dv in only one Class 1 Wilderness area, the Black Canyon of the Gunnison. This inconsistency should be corrected, and the table and section should reflect the new analysis on visibility.	The Proposed RMP/Final EIS has been revised to eliminate the errors in the table.
Air Quality	Form Letter #8	Air pollution is released at all stages of oil and gas development from exploration and drilling to processing. Natural gas and associated byproducts are released during venting, dehydration, gas processing, compression, leaks from equipment (fugitive emissions), and when wastes are brought to the surface and evaporated from open pits. These processes can release Volatile Organic Compounds, Benzene, Methane, Hydrogen Sulfide, Nitrogen Oxides, Sulfur Dioxide and particulate matter. These chemicals and compounds can cause asthma, cancer, neurological damage, pulmonary and coronary problems, endocrine disruptions and headaches. There have been highly publicized cases of landowners in the Grand Valley suffering from some of the abovementioned ailments and their belief that the problems were caused by oil and gas productions. Unfortunately, there are no air monitoring stations within the Little Snake Resource Area and previous the 1989 Resource Management Plan did not specifically address ambient air quality or the air quality-related values of visibility and atmospheric deposition. RECOMMENDATIONS: Establish air-monitoring stations within the Little Snake Resource Area to monitor the impacts to air quality, as there have been no air quality or visibility studies within the Little Snake Resource Area since 1993.	As noted in chapter 2 of the Draft RMP/EIS, BLM policy provides requirements to minimize air quality impacts, and to comply with federal, state, and local regulations. Specifically, the Draft RMP/EIS states, "The Federal Government has established ambient air quality standards for criteria pollutants considered harmful to public health and the environment, and these have been accepted by the State of Colorado to comply with the Clean Air Act." While actions on BLM lands or lands administered by BLM must comply with these standards, BLM is not the agency responsible for monitoring air quality. BLM works with other federal and state agencies to monitor air quality impacts. As such, including a requirement to establish monitoring stations within the RMPPA is outside the scope of the RMP.
Air Quality	Moffat County Commissioners	p. 2-8 – 2.5.1.2 Air Quality Management Actions. As Moffat County understands new 2007 Air Quality Regulations, flareless well completions are no longer a BMP but a State of Colorado Requirement, therefore the RMP needs to reflect this change and not suggest it as a BMP.	No green completion requirement existed at the time of the original Draft RMP/EIS analysis. As of December 2008, the Colorado Department of Public Health and Environment regulations did not require green completions anywhere. However, the latest draft Colorado Oil and Gas Conservation Commission regulations do include a state-wide green completion requirement for production wells. It does not apply to exploration (wildcat) wells and

Category	Commenter	Comment	Response
			there is a variance provision. If green completion is included in the final regulations, the regulation would supersede a BMP in the RMP. BMPs are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. The language in chapter 2 of the Proposed RMP/Final EIS has been revised to address the use of more BMPs than just flareless well completion, but to encourage the use of BMPs that will mitigate air quality impacts.
Air Quality	Questar, Rockies Region	Page 1-12, Section 1.6.4: Contrary to this section, the Clean Air Act does not require the BLM to protect air quality, maintain air quality standards or abide by state implementation plans. Under the Clean Air Act, the EPA and states have these responsibilities.	While regulatory authority for enforceable air quality standards is delegated by U.S. EPA to the states in enforceable State Implementation Plans, all federal agencies, including BLM, are required to assess the potential environmental impacts of major agency activities. While BLM may not be directly responsible for air quality impacts that may result from activities conducted by other entities on BLM controlled lands, as the federal land manager BLM has an obligation to anticipate and evaluate impacts that are reasonably expected to occur.
Air Quality	Questar, Rockies Region	Page 2-8, Section 2.5.1.2: Remove the addition of flareless completions and directional drilling to the list of BMPs or make these	The language in chapter 2 of the Proposed RMP/Final EIS has been revised to address the use

Category	Commenter	Comment	Response
		uses voluntary or based on economic and technological feasibility.	of more BMPs than just flareless well completion and to encourage the use of BMPs that will mitigate air quality impacts. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information.
Air Quality	Questar, Rockies Region	Page 4-6, Section 4.3.1: The sentence "PM, CO, NOx, and hydrocarbon emissions (VOCs) would be produced from any glycol operations and flashing." Questar is not aware of any significant PM emissions associated with glycol dehydration and/or still vent flashing and requests the "PM" reference be removed	The Proposed RMP/Final EIS has been revised to remove references to PM in association with glycol operations and flashing, as noted in the comment.
Air Quality	Questar, Rockies Region	Vol. 2 I-6 - Questar believes "Table 1-6 National Ambient Air Quality Standards" contains several errors: 1. Ozone - Note that one hour standard of 0.12 ppm has been revoked except for fourteen "non-attainment" areas. This should be removed or footnoted. 2. Sulfur Dioxide - The 2 hour standard of 0.5 ppm is correct; but ppb should equate to 500 not 226. The 24 hour standard of 0.14 ppm is correct; but the ppb should be 140 not 99. The annual standard of 0.03 ppm is correct; but ppb should be 30 not 23. Also not that the 2 hour standard is a "secondary standard" and should be footnoted as such. 3. PM10 - the annual standard of 50 ug/m3 was revoked as of 12.17.2006 and no longer applies. 4. PM2.5 - the 24 hour standard of 65 ug/m3 was revised to 35 ug/m3 as of 12.17.2006. Questar references the USEPA website: http://www.epa.gov/air/criteria.html as sources for the above information on ambient air quality standards.	The Proposed RMP/Final EIS has been revised to eliminate the errors in the table. Data in the table has been revised and updated as appropriate and in accordance with National Ambient Air Quality Standards and state regulations in order to accurately reflect the most current data available.
Air Quality	Questar, Rockies Region	Vol. 2 I-10 - Questar questions the inclusion of "Figure I-3 Mean Annual Ozone Concentrations in Rocky Mountain National Park". At best, this figure is confusing by showing an acceptable ozone level of concern ranging from just under 40 ppb to just under 80 ppb. The	The Proposed RMP/Final EIS has been revised resulting in the removal of this figure.

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		NAAQS for ozone is 80 ppb; there is no range. In addition, the source is cited as "Clean Air Status & Trends Network Rocky Mountain National Park ROM 406", yet the write-up on page I-9 indicates this information from the Fox et al 1989 report on the Bridger Wilderness in Wyoming. The figure should be revised to show the correct ozone standard or eliminated from the RMP.	
Air Quality	Questar, Rockies Region	Vol. 2 I-12: Questar notes the section on Atmospheric Deposition concerning precipitation acidity states "All three monitoring stations dropped below a pH of 5.0, which indicated acidification of precipitation, starting 1994 and continuing through 2001." A review of "Figure 1-6 Mean Annual Precipitation pH in the Little Snake RMPPA" shows this trend; but it also shows pH levels returning to "natural levels" in 2002 and 2003. Questar believes this needs to be stated in the write-up.	The Proposed RMP/Final EIS has been revised to include an explanation of the final years of the trendline.
Air Quality	Wilderness Society (The), et. al.	It is our understanding that BLM is completing air quality modeling for the Glenwood Springs, Kremmling, Little Snake, and White River Field Offices (and some reports indicate that the Grand Junction Field Office may also be included). While a regional approach to air quality is commendable, no mention of this collaborative effort or its impacts on activities within the Little Snake Field Office is included in the Draft RMP. Given the amount of oil and gas development anticipated, not only in the Little Snake Field Office, but also throughout the White River Field Office, the Glenwood Springs Field Office, and the Kremmling Field Office, a comprehensive air quality analysis is sorely needed. This analysis should also consider the impacts to air quality from oil and gas development in the Grand Junction Field Office in Colorado, the Rock Springs and Rawlins Field Offices in Wyoming, as well as oil and gas development in Vernal, Price, and Moab Field Offices in Utah. Air pollution problems, perhaps more than any other environmental problem, are not subject to human-created, artificial boundaries. This regional air model should address the issue of regional haze and the destruction of viewsheds caused by haze (a necessary part of cumulative impact analysis). Recommendations: BLM should disclose how the Regional Air Quality Modeling (Glenwood Springs, Little Snake, Kremmling, White River and other Field Offices) will impact activities within the Field Office as well as what the Little Snake Field Office's role is in this air modeling effort.	There is no regional air quality modeling effort associated with this planning effort. In addition to the impact analyses for air quality already contained in the Draft RMP/EIS, the EPA requested that BLM model the potential impacts to air quality from oil and gas development to ensure that the existing air quality impacts analysis is supported by more detailed modeling. The conclusions of the modeling effort, which was released to the public for review and comment (see responses in the Proposed RMP/Final EIS Appendix R), supported the conclusions that were already in the Draft RMP/EIS. This modeling effort accounted for the dispersal of potential emissions and modeled where they may be dispersed, including the number of days that regional Class I air sheds would have reduced visibility.
Air Quality	Wilderness Society (The),	As part of a regional air model, BLM should prepare an Air Quality Baseline and Analysis Report, including the information found in the	BLM is not the agency responsible for air quality regionally or within the planning area. The Draft

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	et. al.	Little Snake Draft RMP and set air quality goals and objectives aimed at improving air quality both regionally and throughout the planning area. The Draft RMP fails to set any additional goals or objectives beyond those already found in existing regulations (Draft RMP, p. 2-8). The Little Snake Field Office should seek to exceed local, State and Federal air quality standards, including the requirements of applicable State implementation plans and ambient air quality standards and improving air quality in non-attainment areas. Protecting air quality should be a priority – not just an afterthought that is done if convenient or "feasible." FLPMA requires BLM to consider the relative value of the various resources, and clean air is quickly becoming (along with undeveloped landscapes) a most valued, yet dwindling resource. Therefore, BLM should take a proactive approach to managing air quality by, among other things: setting aggressive standards (beyond that simply found in existing regulations); requiring any actions on public lands to meet those standards (i.e. no flaring, no two-stroke engine use on public lands, etc); analyzing the cumulative impact of any proposed action with other past, present, and reasonably foreseeable actions; establishing an effective monitoring program; and halting any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded. Further, in the Proposed Plan, BLM should add a sentence in Section 2.5.12 which states, "BLM's goal is to exceed the air quality standards found in the Clean Air Act and the State of Colorado Ambient Air Quality Standards for activities occurring on BLM lands".	RMP/EIS includes language that BLM permitted activities would comply with all applicable local, State, tribal, and federal laws, regulations, standards, and implementation plans, and that all applicable State, tribal and federal air quality standards would be met or exceeded. It is important to note that meeting the air quality standards is not an afterthought that is achieved if it is convenient, as noted by the commenter. However, the RMP is not the correct governmental document or process to increase air quality standards.
Air Quality	Wilderness Society (The), et. al.	The only management action BLM lists for Air Quality is that, "The use of "green" or flareless well completions as a best management practice (BMP) for oil and gas operations would be encouraged" (Draft RMP, p. 2-8). No explanation of how this will be accomplished or by what mechanism this "encouragement" will take place is found in the Draft RMP. BLM must make flareless well completions a mandatory BMP, not simply one which will be encouraged. Further, BLM should look to the Wildlife Protection Guidelines for Oil and Gas Development (endorsed by 66 wildlife and conservation groups (attached) and available at:http://www.coloradowildlife.org/advocacy/guidelinesoilgas.asp) for additional BMPs for air quality monitoring. Finally, BLM must make flareless well completions mandatory, analyze the impacts of adopting additional Best Management Practices for oil and gas development in relation to air quality, and	No green completion requirement existed at the time of the original Draft RMP/EIS analysis. As of December 2008, the Colorado Department of Public Health and Environment regulations did not require green completions anywhere. However, the latest draft Colorado Oil and Gas Conservation Commission regulations do include a state-wide green completion requirement for production wells. It does not apply to exploration (wildcat) wells and there is a variance provision. If green completion is included in the final regulations, the regulation would supersede a BMP in the RMP. BMPs are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts

Category	Commenter	Comment	Response
		adopt these BMPs in the Proposed Plan.	and negative environmental impacts from management actions. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. The language in chapter 2 of the Proposed RMP/Final EIS has been revised to address the use of more BMPs than just flareless well completion, but to encourage the use of BMPs that will mitigate air quality impacts.
Air Quality	Yates Petroleum Corporation (through agent)	Page 2-8 2.5.1.2 Management Actions. Green completions can only be done where pipelines available.	The language in chapter 2 of the Proposed RMP/Final EIS has been revised to address the use of more BMPs than just flareless well completion, but to encourage the use of BMPs that will mitigate air quality impacts. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information.
Alternatives (General)	Black Canyon Audubon Chapter 28478	Another way to make C more palatable to the general public would be to offer more protection for the Citizens' Wilderness Proposal lands. Minimizing fragmentation from ORVs and energy so that these lands may be preserved in nearly their present state would be	The Draft RMP/EIS, Alternative D, considered managing all the lands outside WSAs with wilderness characteristics to protect those characteristics.

Category	Commenter	Comment	Response
		an important long term decision.	
Alternatives (General)	Environmental Protection Agency (EPA), Region 8	EPA is concerned with BLM's decision to eliminate from full analysis a phased development alternative to the proposed oil and gas activities. The DEIS indicates that phased leasing would cause delays in production of energy resources, delay royalties to the Federal government, and not take into account supply and demand economics, BLM also states that a phased leasing regime would result in additional decision-making burdens for BLM. EPA acknowledges these challenges. However, considering that the project may cause significant air quality and wildlife impacts, EPA recommends that the DEIS contain a full analysis of phased development alternative, or more fully explain why a phased development alternative was eliminated from full analysis. Detailed consideration would provide the decision-maker with important information on approaches to mitigating environmental impacts in areas with high wildlife habitat and scenic values.	BLM's consideration in the Draft RMP/EIS of ceilings on surface disturbance for oil and gas development is a form of phased development. Using disturbance ceilings of 1% and 5% is a flexible way to require operators to phase their developments. The limitations on surface disturbance impacts and slowing development down until old surface disturbance is reclaimed is maintained, mitigating wildlife and air quality impacts and increasing large, unfragmented blocks of habitat. However, unlike a “traditional” phased development approach where BLM requires development in area X first, then move to area Y, there would be no geographic limits (other than restrictions, such as sage-grouse leks) and no limits on number of wells drilled per year. Operators have ability to account for economics and plan for pipelines and other infrastructure. Because the range of alternatives would allow for phased leasing and development in Vermillion Basin (under Alternative C in the Draft RMP/EIS, but included in a revised Alternative B in the Proposed RMP/Final EIS), the Draft RMP/EIS incorrectly identifies phased development in Vermillion Basin as an alternative not analyzed in detail. This section has been removed from the Proposed RMP/Final EIS.
Alternatives (General)	Environmental Protection Agency (EPA), Region 8	A phased development alternative can be defined in a number of ways including temporal and geographic development. EPA recommends analysis of a geographically-phased development alternative. EPA is willing to assist you in defining a reasonable phased development alternative and we recommend that you contact the Montana State BLM office for recent experiences in this matter.	BLM's consideration in the Draft RMP/EIS of ceilings on surface disturbance for oil and gas development is a form of phased development. Using disturbance ceilings of 1% and 5% is a flexible way to require operators to phase their developments. The limitations on surface disturbance impacts and slowing development down until old surface disturbance is reclaimed is maintained, mitigating wildlife and air quality impacts and increasing large, unfragmented blocks of habitat. However, unlike a “traditional” phased development approach where BLM requires development in area X first, then move to area Y, there would be no geographic limits (other than restrictions, such as sage-grouse leks) and no limits on number of wells drilled per year. Operators have ability to account for economics and plan for

Category	Commenter	Comment	Response
			pipelines and other infrastructure. Because the range of alternatives would allow for phased leasing and development in Vermillion Basin (under Alternative C in the Draft RMP/EIS, but included in a revised Alternative B in the Proposed RMP/Final EIS), the Draft RMP/EIS incorrectly identifies phased development in Vermillion Basin as an alternative not analyzed in detail. This section has been removed from the Proposed RMP/Final EIS.
Alternatives (General)	Form Letter #2	The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring than any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	The Proposed RMP/Final EIS, Proposed RMP (Alternative C) includes management stipulations for oil and gas development that will maintain large blocks of unfragmented wildlife habitat. Such habitat will also provide for the open landscapes mentioned by the commenter, as well as limit the impacts on air, water and wildlife habitat. The impacts of Alternative C, as well as the other management alternatives considered, are contained in chapter 4 of the Proposed RMP/Final EIS.
Alternatives (General)	Moffat County Commissioners	p. 2- 111 Surface Disturbing Activities 1) Table 2-43, 2-44, 2-45 all mislead the reader to think stipulations are mandatory. Moffat County recommends placing a note at the front of each of these tables to reflect that stipulations can be waived by following the Adaptive Criteria in Appendix M.	The Surface Disturbance Restrictions described on page 2-111 have been removed from the Proposed RMP/Final EIS. Uses other than oil and gas development will be subject to the specific restrictions for Alternative D. The reason the surface disturbance restrictions were included in the Draft RMP/EIS was to be consistent between oil and gas stipulations and other uses. This still remains the intent of BLM and removing this decision in the land use plan does not affect BLM's ability to apply restrictions consistently for different uses. BLM can still be consistent at the activity level, where it is easier to address actions on a case-by-case basis. BLM has all the authority it needs to protect surface resources with project-level NEPA and planning. Therefore, there is no need for an RMP-level decision. Surface disturbance restrictions created several unforeseen conflicts. Some reasons for the change include inconsistency between use restrictions, surface disturbance restrictions are confusing and undefined, they reduce flexibility needed to address resource concerns, they are unneeded, and not all

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			uses are the same. No Ground Disturbance Restrictions conflict with other restrictions. NGD designations were in conflict with ROW restrictions and surface coal mining restrictions. It is unclear what actions qualify as a "permitted surface disturbing activity." Would this include actions such as re-seeding after a wildfire or a sage-grouse guzzler? This ambiguity could lead to confusion and litigation. Depending on how permitted surface disturbing activities were defined, these restrictions could severely limit BLM's flexibility in addressing resource needs. Umbrella surface disturbance restrictions are unneeded because BLM already has restrictions for oil and gas, coal, mineral materials, nonenergy leasables, realty actions, OHVs, and visual resources. Finally, although permitted surface disturbing activities may all disturb the surface in some way, the effects are not the same. Impacts have different scope, intensity, and duration.
Alternatives (General)	Mark Pearson	Oil and gas development is the predominant use of most of the BLM land in northwest Colorado. Simple fairness as well as a sincere commitment to multiple use management requires that the significant and unique wild aspects of this landscape be protected. BLM's preferred alternative does not do this and should be revised to protect all existing and proposed ACECs, protect all eligible wild and scenic river candidates, and preserve the wilderness character of Vermillion Basin.	The Draft RMP/EIS, Alternative D, considered all the management options suggested by the commenter. In addition, Alternative C (Proposed RMP) has been revised in the Proposed RMP/Final EIS to close Vermillion Basin to oil and gas leasing, adopting management from Alternative D for this area.
Alternatives (General)	Public Lands Advocacy	PLA believes the range of alternatives in the DEIS is unduly limited. It came to our attention during the planning process that in order to prepare the DEIS within an established budget, financial constraints limited the analysis to four only alternatives. While this may have sounded reasonable, it has proved not to be beneficial because it severely limited the BLM's management options. For example, Alternative A carries forward the current management actions; Alternative B attempts to show the effects of oil and gas operations with limited restrictions; Alternative C represents an attempt to reconcile potential conflicts; and Alternative D focuses on preservation, the most restrictive management alternative. Clearly, only one of these alternatives would be viable as a preferred alternative, Alternative C, which gives BLM only highly limited management options. The problem is that in order to demonstrate an adequate range of alternatives, Alternative C is full of	NEPA does not require BLM choose an alternative in its entirety when moving from the Draft RMP/EIS to the Proposed RMP/Final EIS, or even into the Final RMP/Record of Decision. BLM has the discretion to select an alternative in its entirety, to combine aspects of the various alternatives that were presented in the Draft RMP/EIS, or to consider management approaches that were presented during the comment period that do not result in significant changes from what the Draft RMP/EIS considered. In the Final EIS, Alternative C has been revised and is now the Proposed RMP. The Proposed RMP uses Alternative C from the Draft RMP/EIS as a foundation with adjustments made in response to public comments, internal comments, and

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		management tools that may not be suitable to facilitate reasonable multiple use activities, such as grazing, oil and gas exploration and development and motorized recreation.	coordination with cooperating agencies. As clarified in CEQs Answers to 40 Frequently Asked Questions on NEPA, "When there are potentially a very large number of alternatives, only a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed and compared in the EIS." The Draft RMP/EIS, and subsequently this Proposed RMP/Final EIS, has complied with this clarification from CEQ in complying with NEPA regarding a reasonable range of alternatives. Additionally, the term "multiple use" as defined in FLPMA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction does not require that all uses be accommodated in all areas, but that certain areas can be managed for a given resource, where another area may be managed for a given use. Each alternative considered in the Draft RMP/EIS and Proposed RMP/Final EIS reflect this provision.
Alternatives (General)	Public Lands Advocacy	We urge that BLM include in the Final EIS an additional alternative that gives BLM the flexibility to more reasonably address the needs of all uses on public lands. This alternative would provide a better balance of resource uses and restrictions than offered in Preferred Alternative C or Alternative B. The new alternative would also utilize a broader variety of management options available to manage oil and gas and other activities without the excessive limitations required in Alternative C and without the lack of management options identified in Alternative B. For example, Alternative B eliminates existing Areas of Critical Environmental Concern (ACEC) and Special Management Areas (SMA). It also severely limits the use of seasonal or timing limitations to protect wildlife species to 149, 360 acres while leaving 1.5 million acres of the study area open to leasing with standard lease terms. Alternative C, on the other hand, requires seasonal or timing limitations on 1.2 million acres while allowing standard lease terms on only 417,800 and would apply the principles of adaptive management.	BLM is allowed to incorporate elements from stated alternatives when creating a Proposed Plan and Final EIS/Record of Decision. Therefore, an additional alternative that would incorporate parts of Alternatives B and C is not necessary.
Alternatives (General)	Public Lands Advocacy	PLA believes a new alternative could reduce the use of seasonal restrictions to areas where they are actually justified, retain existing	Alternative C, (Preferred Alternative) in the Draft RMP/EIS includes the provision to remove seasonal

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		ACECs and SMAs, including the new SMAs described in Alternative C, and employ a modified approach to the adaptive management scheme outlined in Alternative C. The modified adaptive management approach would not impose the artificial acreage limitations contained in Alternative C, but would allow year-round drilling where necessary while relying upon scientific monitoring data designed to determine when and what changes in management and operations might be required. The new alternative would also retain the existing 2-mile buffer around sage grouse leks, eliminating the new 4-mile radius. (This issue will be addressed later in these comments.) This new alternative would not require a supplemental EIS because it would draw upon the elements of the alternatives already analyzed in the DEIS.	restrictions and allow year-round drilling where the operator meets surface disturbance limitations AND prepares a Plan of Development that manages for large, unfragmented sagebrush habitat. Additionally, BLM has the flexibility to grant exceptions, modifications, or waivers, as described in the Draft RMP/EIS, Appendix E. Therefore, no additional management detailing an adaptive management approach is required. Beyond these issues, the commenter has not presented any new alternative or management direction that BLM hasn't already considered in the Draft RMP/EIS.
Alternatives (General)	Vermillion Ranch Limited Partnership	Pg 2-79 2.6.3.2 SRMA and special land designations must not diminish livestock sustainability and ability to do range improvements	The impacts from the alternatives are contained in chapter 4 of the Draft RMP/EIS. Impacts to livestock grazing from SRMAs and other special management areas are noted in chapter 4 (Section 4.4.2).
Alternatives (General)	Western Watersheds Project	We did not find that the RMP provided an adequate range of alternatives, particularly as regards livestock grazing. There were no alternatives specifying No Grazing or Significantly Reduced Grazing. No grazing systems were specified to provide the necessary rest or recovery of native plant species or ground cover and watershed function. Instead the RMP relies on "adaptive management" which has been employed and failed in the past to correct the many ecological problems occurring in the Little Snake Field Office Area. A recent court decision in Idaho threw out such a generalized "adaptive management" decision due to lack of specificity.	A discussion of why a no grazing alternative was considered but not analyzed is provided on page 2-2. Regarding closing areas to livestock grazing, BLM felt any resource impacts created by livestock grazing could be addressed at the activity level and therefore closing areas to grazing would be arbitrary and capricious. Nowhere is it stated in the Draft RMP/EIS that BLM is relying on adaptive management to correct ecological problems. BLM has many existing processes established through law and policy designed to correct ecological problems, such as the Standards and Guidelines process. BLM recognizes that an adaptive management approach is incomplete without measurable outcomes, indicators, and trigger points. However, including these details in a land use plan where they cannot be changed without a RMP amendment is contrary to the flexibility which an adaptive management approach is designed to provide. Therefore, BLM has committed to preparing a subsequent adaptive management document entitled an Assessment Guidance Document. This document will contain all the necessary specific information required for adaptive management. BLM

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			states in Appendix M that the Assessment Guidance Document will be developed within a 2-year period after the ROD is signed and that no adaptive management projects would be allowed before the approval of this document.
Alternatives (General)	Western Watersheds Project	A systematic monitoring system must be established and adhered to in managing grazing as well as other activities. This system should include monitoring of water quality for temperature, sediments and coliform organisms as livestock are well known to degrade these parameters.	BLM concurs that monitoring is an important component to land use planning and proper land management. Appendix F provides a description of general monitoring activities in the field office. Additionally, a discussion of system-level monitoring will be included in the Assessment Guidance Document as part of the adaptive management process to be employed in the implementation of Alternative C (Proposed RMP). The development of more specific monitoring systems is addressed at the activity level and is not an RMP-level decision.
Alternatives (General)	Western Watersheds Project	The RMP did not analyze the recently published Heart of the West Conservation Plan by the Wildlands Project and Wild Utah Project. This area, stretching from Wyoming into Colorado, Idaho and Utah is a critical wildlife corridor and core area for pronghorn, sage grouse, lynx, wolves and other species.	Chapter 3 provides an adequate description of baseline habitat conditions within the planning area.
Alternatives (General)	Wilderness Society (The), et. al.	2. The Draft RMP is unbalanced, failing to take advantage of the considerable conservation opportunities presented by this RMP revision and instead overemphasizing oil and gas development: The Heart of the West Plan, which outlines a number of recommendations for balancing oil and gas development with resource protection, was submitted during scoping. BLM should also incorporate the recommendations outlined in Section IV of our comments, Impacts of Oil and Gas Development on Wildlife and Greater Sage Grouse. These recommendations permit oil and gas development where appropriate, but ensure all development is done in a manner which will not forever alter the character of the resource area. Additionally, recommendations for balancing resource extraction and ORV use with resource protection were provided in the Friends of Northwest Colorado Vision, submitted to the BLM prior to publication of the Draft RMP. Furthermore, BLM should protect the CO 13 Big Bottom and CO 13 Nine Mile Gap habitat linkages identified by the Southern Rockies Ecosystem Project (attached).	Through the public scoping process BLM identified a variety of issues to be addressed in the range of alternatives, including issues and approaches from the commenter's submission. The alternatives in the Draft RMP/EIS were developed to present a reasonable range of alternatives that best addressed the issues, concerns, and approaches identified by the public, while complying with the FLPMA mandate to manage public lands on the basis of multiple use and sustained yield. FLPMA makes it clear that the term "multiple use" means that not every use is appropriate for every acre of public land and that the Secretary can "make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use…" (FLPMA, Sec. 103(c)). FLPMA directs that land use planning is the mechanism for allocating resource uses and conserving and protecting other resource values for current and future generations. In line with this allocation, the range of alternatives includes

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			approaches for the protection of natural and cultural resources, for providing outdoor recreation and human occupancy and use, and for recognizing the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands (FLPMA Sec. 102(a)(7), (8), and (12)). The range of alternatives in the Draft RMP/EIS present a range of options for meeting the FLPMA mandates. However, based on public comments on the Draft RMP/EIS, the Proposed RMP/Final EIS has been revised to include updated management for sagebrush habitats, reflecting updated scientific information. The revised management includes limitations on surface disturbance and requirements for plans of development that promote large blocks of undisturbed habitat. The range of alternatives does consider strategies for habitat management presented in The Heart of the West Conservation Plan Section 5.3.4 (Prescription Stipulations for Activities in Core and Linkages), including closing WSAs to oil and gas leasing and limiting disturbance from oil and gas development in areas with high and medium value sagebrush habitat. However, BLM is not obligated to take an external proposal and analyze it in its entirety or to alter the proposal. As noted above, the issues, principles and approaches addressed in public scoping comments were considered in the RMP development process, but limited by the scope of the current planning effort, the purpose and need of the EIS, and most importantly, BLM's multiple use mandate outlined in FLPMA. Finally, the commenter fails to identify what it means to "protect" the habitat linkages identified by the Southern Rockies Ecosystem Project. The recommendations from the Southern Rockies Ecosystem Project for those two segments do not apply to activities within the scope of this RMP. In addition, under the Proposed RMP (Alternative C, Proposed RMP/Final EIS), oil and gas leasing would have a CSU stipulation limiting disturbance from development to 5%, as well as seasonal closures varying from 3 to 9 months. Due to the lack of detail in the commenter's concern, BLM cannot provide a

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			more specific response.
Alternatives (General)	Wilderness Society (The), et. al.	Recommendations: In developing and evaluating potential management alternatives for the Little Snake Field Office, BLM should bear in mind the concept of multiple use, as defined above, in order to inventory and safeguard resources such as scenic values, cultural resources and wildlife habitat, create ACECs, and preserve lands with wilderness character. We are concerned that BLM has not complied with these obligations, resulting in an unbalanced management plan.	BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, four alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degree of resource use or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The alternatives in the Draft RMP/EIS were developed to present a reasonable range of alternatives that best addressed the issues, concerns, and approaches identified by the public, while complying with the FLPMA mandate to manage public lands on the basis of multiple use and sustained yield. FLPMA makes it clear that the term “multiple use” means that not every use is appropriate for every acre of public land and that the Secretary can “make the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use…” (FLPMA, Sec. 103(c)). FLPMA directs that land use planning is the mechanism for allocating resource uses and conserving and protecting other resource values for current and future generations. In line with this allocation, the range of alternatives includes approaches for the protection of natural and cultural resources, for providing outdoor recreation and human occupancy and use, and for recognizing the Nation’s need for domestic sources of minerals, food, timber, and fiber from the public lands (FLPMA Sec. 102(a)(7), (8), and (12)). The range of alternatives in the Draft RMP/EIS present a range of alternatives for meeting the FLPMA mandates.
Alternatives (General)	Wilderness Society (The), et. al.	The management alternatives presented do not comply with BLM’s obligation to consider a reasonable range of alternatives or to consider the environmentally preferable alternatives that would conserve the many valuable natural resources in the Little Snake Field Office.	BLM used the scoping process to explore and objectively determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, four alternatives were identified (including the No Action Alternative) for further analysis. Each

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			alternative considers various levels or degrees of resource use and/or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. The commenter's accusation is vague, and without additional detail questioning the range of specific decisions, further response is not possible.
Alternatives (General)	Wilderness Society (The), et. al.	Recommendations: BLM must fully assess the potential environmental consequences of management decisions, as described above, and consider a true range of alternatives, including more environmentally preferable management approach and mitigation measures. In developing alternatives and assessing their potential impacts, BLM must use data and methods of high quality and establish a baseline of existing conditions against which potential impacts can be assessed.	The commenter's statement merely repeats case law and federal NEPA regulations without identifying areas in the Draft RMP/EIS that fail to meet these statutory requirements. As explained in the Draft RMP/EIS (chapters 1 and 5), BLM used the scoping process to explore and determine a reasonable range of alternatives that best addressed the issues, concerns, and alternatives identified by the public. As a result, four alternatives were identified (including the No Action Alternative) for further analysis. Each alternative considers various levels or degrees of resource use and/or resource protection to give the public the ability to fully compare the consequences of each management prescription or action. Additionally, chapter 4 of the Draft RMP/EIS identifies the potential impacts from implementing each of the alternatives. The commenter's recommendation is vague, and without additional detail identifying specific deficiencies in the Draft RMP/EIS, further response is not possible.
Alternatives (General)	Wilderness Society (The), et. al.	We recommend application of the "precautionary principle" of conservation biology, which states that precautionary measures should be taken when a certain activity or inactivity threatens to harm human health or the environment, even when science has not fully established cause-and-effect relationships (Groom et al. 2006) (attached). This principle is rooted in the recognition that scientific understanding of ecosystems is complicated by numerous factors, including dynamic ecosystem processes and the various effects of human activities. Put simply, it is easier to prevent harm to biodiversity than to attempt to repair it later.	FLPMA directs BLM to manage public lands "on the basis of multiple use and sustained yield unless otherwise specified by law" (FLPMA Sec 102 (a)(7)). FLPMA also directs BLM to "take any action necessary to prevent unnecessary or undue degradation of the lands" (FLPMA 302(b)). However, completion of this EIS includes decisions and analyses that recognize the complexity of ecological systems and acknowledge that maintaining natural systems in proper functioning order is easier than restoring impacted areas.
Alternatives (General)	Wilderness Society (The), et. al.	The Preferred Alternative provides a management option "To maintain and improve large blocks of functional sagebrush communities, oil and gas operators could opt into an agreement to limit habitat fragmentation in return for easing timing limitation	The decisions in the Draft RMP/EIS were made at the landscape level by applying stipulations to all of given habitat types or areas with specific habitat values. The decisions placing ceilings on surface

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		stipulations and allowing year-round drilling." Draft RMP, p. 2-16. We encourage the BLM's attempts to protect large functional patches of sagebrush habitat. However, this plan as described for the Preferred Alternative (Draft RMP, pp. 2-16 to 2-18 and 4-58) will not have the intended effect. Habitat protection decisions must be made at a landscape level not a lease level. Leases are simply too small to make ecologically sound decisions on habitat management. Even if relatively good decisions are made by one leaseholder that kept direct disturbance to a few percent and clustered development on a small portion of the lease, it could be surrounded by areas of dense development by leaseholders choosing not to opt into this management option. Viable options for protecting sage-steppe habitat must be mandatory and provide for long-term protection of substantial habitat patches and connectivity between patches and migratory paths. (Please see recommendation below regarding landscape level protection planning.) Recommendations: If oil and gas operators have existing leases within the priority sagebrush patches identified by BLM and DOW, BLM should make it mandatory that special restrictions regarding surface disturbance and activity levels are placed on activities in those areas. The agency should also develop a more protective strategy for conserving and connecting patches of sagebrush habitat for ungulate winter range, sagebrush obligate birds, and prairie dogs that requires patches of un-fragmented habitat as well as reduced direct disturbance.	disturbance were revised in the Proposed RMP/Final EIS after review of public comments and extensive coordination with CDOW specialists. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary, incentive based) leases. It is also important to note that the ceiling on disturbance is not the only stipulation associated with development in these areas. The stipulation also states that BLM would require PODs from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Map 2-3 illustrates the extent of this habitat protection approach, which covers the majority of the planning area. By setting stipulations on the entire extent of a habitat or type of habitat value, across the landscape, the Draft RMP/EIS did make habitat protecting decisions at the landscape scale. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation. Additionally, language was added to Section 2.6.1.2 stating that BLM has the discretion to modify surface operations to change or add specific mitigation measures when supported by scientific analysis.
Alternatives (General)	Wilderness Society (The), et. al.	The Draft RMP does not provide a balanced range of alternatives that gives sufficient consideration to the long-term protection of habitat and wildlife. On the contrary, all but alternative D allow for the development of the full 3031 wells allowed under the RFD. Page 4-145 states that "Under Alternatives A, B, and C, a total of 3,031 wells could be drilled during the next 20 years". The 3,031 wells figure comes directly from the number of wells requested by the oil and gas industry. The preferred alternative makes no attempt to reduce the number of wells or require phased or cluster development to protect other uses and resources, particularly for habitat and wildlife. Recommendations: Given the substantial negative impacts likely to affect sage steppe habitat and wildlife (see comments above) the final alternative must, at a minimum, compromise between requests	The 3,031 well figure does not come from a request from the oil and gas industry, as there was no such request. The commenter misunderstands an RFD. An RFD scenario does not authorize any wells to be drilled. An RFD is an analysis tool in which BLM develops educated assumptions about how much oil and gas development might take place in the 20-year life of the plan. These assumptions are used in the Environmental Consequences section of the EIS to portray impacts of potential oil and gas development. There is no alternative which "allows for the development of the full 3031 wells." BLM land use plans authorize leasing. Wells are permitted at the implementation stage, not the land use planning stage. While industry information was used in

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		from the energy industry and the protection of natural resources. A more prudent approach would be to develop a system for clustered and phased development allowing for added protection for habitat and wildlife by geographically clustering development and phasing production and restoration over a longer period of time.	developing the RFD, it is not the sole source leading to the final RFD. The RFD was developed using a variety of information sources, including industry operators who are familiar with the geology of the region as well as the economic and other factors that must be considered in developing an RFD. If the threshold allowed in the RFD is approached in the future due to market demand, BLM will revise the RFD and associated NEPA analyses. The Proposed RMP/Final EIS was revised to stipulate that oil and gas leases limit surface disturbance in high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary, incentive based) leases. The stipulation also states that BLM would require Plans of Development from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation.
Alternatives (General)	Yates Petroleum Corporation (through agent)	Page 2-5 Goals Please include the concept of multiple use and developing the mineral estate which has rights equal to those of the surface rights. This entire document is all about restricting mineral rights in preference to wildlife. The oil and gas industry has over 100 years of operation the Rocky Mountains and it is still the destination of choice. We must have done something right. Page 2-224 There seems to be an overprinting of the table.	Including the recommended goal is not needed in an RMP, as multiple use is required by FLPMA which is noted in the Draft RMP/EIS in chapter 1 (1-9). The term "multiple use" as defined in FLPMA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction does not require that all uses be accommodated in all areas, but that certain areas can be managed for a given resource, where another area may be managed for a given use. The alternatives in the Draft RMP/EIS and Proposed RMP/Final EIS reflect this provision. Not all areas would be open to all types of uses in the planning area or open in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources. The alternatives include seasonal and area closures

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			and designations to ensure that resource values are protected while allowing for mineral use. Additionally, the status of mineral rights is well established through law and court cases and do not need to be stated in the RMP to establish mineral rights. Regarding page 2-224, the overprinting error has been corrected.
Alternatives (General)	Yates Petroleum Corporation (through agent)	Page 2-224 There seems to be an overprinting of the table.	The document formatting was updated to eliminate the overprinting of the table on page 2-224.
Appendices	Colorado Division of Wildlife	Appendix M inadequately spells out the performance based standard criteria, and does not adequately address how the concepts of adaptive management will be applied. Appendix M has insufficient sideboards to measure and track progress/success/failure. Sideboards describing what happens if objectives aren't achieved are too loosely defined. For example, if an operator can't obtain reclamation to an appropriate standard, what are the triggers or actions beyond this point? The RMP indicates that progress will be assessed at 5-year intervals, but significant positive or negative changes could occur within this period of time. Furthermore, mechanisms need to be developed that ensure that institutional knowledge gained from adaptive management experience is transferred to future managers.	Appendix M describes the adaptive management framework BLM would employ when implementing the Proposed RMP. It was not intended to contain resource-specific targets or trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets or triggers should be adapted, this would not be possible without a land use plan amendment. Appendix M states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. Appendix M does explain the process that BLM would employ when making system-level or project-level adjustment if adaptive management is triggered for the various resources (See “Step 4: Making System-Level Changes” on page M-6 and “Step D: Make Project-Level Changes” on page M-9). In addition, the example the commenter uses would also be addressed by the Plan of Development required prior to development of a lease. Part of the Plan of Development is the Plan for Surface Reclamation addressed in Appendix O. These documents would be tailored to the specific area and conditions associated with a given disturbance. Under Step C of the project-level adaptive management framework, the appendix notes that “Closing the loop, or learning from past

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			experience, is a critical aspect of AM," and "the BLM would be committed to learning from this experience and would not authorize another project in a similar circumstance." Developing a specific mechanism to ensure the transfer of institutional knowledge gained from adaptive management experience in the BLM is outside the scope of the RMP.
Appendices	Colorado Division of Wildlife	Exception and waiver criteria (Appendix E): Greater specificity is also needed in the application of exception and waiver criteria. The appendix includes a substantial list of the kinds of information BLM would look at to assess the appropriateness of waivers or exceptions. This list does not characterize how BLM would be likely to use a certain piece of information, however. The general thought process/analysis process that BLM would use to apply any of these criteria should be specified in the RMP and can be included without unreasonably restricting management flexibility.	Additional detail has been added to the criteria presented in Appendix E of the Proposed RMP/Final EIS.
Appendices	Colorado Division of Wildlife	Appendix O: Reclamation process/standards need to be more specifically described. Reclamation is the primary determinant of whether surface disturbance is temporary or permanent. It is a particularly important part of the sagebrush habitat functionality proposal and must be well measured and documented for that proposal to be effectively implemented. The performance measures listed on pp O-I to O-2 are fine as far as they go, but there should be much more detail presented on how these attributes are to be measured, at what intervals and for how long, by whom or at whose expense, consequences of reclamation failure, etc. A clearer formula for evaluating reclamation success and a geospatial process for tracking disturbances and reclamation will be needed and should be described in the RMP. CDOW agrees that stipulating specific reclamation practices in the RMP is unwise, as it may preclude more effective future options. However, whatever reclamation practices are adopted should be performance based.	Appendix O has been revised in the Proposed RMP/Final EIS to include additional detail and clarification on reclamation standards and processes. This revision was coordinated with the revisions to the sagebrush habitat management decisions for the Proposed RMP (Alternative C) and the disturbance ceilings contained therein. Additionally, the consequences to the lessees of not reclaiming to these standards is addressed in chapter 2 of the Proposed RMP/Final EIS, specifically that no additional disturbance would be allowed beyond the given disturbance ceiling. Concerning who will perform and pay for the reclamation and monitoring, the language presently in the Proposed RMP/Final EIS is sufficiently clear. The first sentence of the appendix notes that it is the lessee's responsibility to use "reclamation practices." The activities that constitute those reclamation practices are defined throughout the Appendix, but if the responsibility to perform those activities is not specifically identified, it would default to this first sentence, that is, the lessee. The way the text is written clearly supports this.
Appendices	Moffat County Commissioners	Appendix D-13. Agencies with Contiguous boundaries. Moffat County requests this appendix be changed from agencies with	Private landowners are not under legal or regulatory obligation to review river segments for inclusion in

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		contiguous boundaries to 'agencies and private landowners' and address that many of the landowners have land management plans including federal lands, fire plans, grazing plans and general management that is inseparable from the agency neighbors. In many cases the agencies depend on the private land management plan implementation to for successful agency land management.	the Wild and Scenic River System (NWSRS). Therefore, consideration of consistency with wild and scenic river eligibility and/or suitability findings with such landowners is not possible. However, several of the 12 suitability criteria (criteria #2, 3, 4, 7, 9, 10 and 11) analyzed and added to the Proposed RMP/Final EIS Appendix D address aspects of local land ownership, management, and interest in designating rivers as part of the NWSRS.
Appendices	Moffat County Commissioners	Appendix O-1 Reclamation Performance Standards: Moffat County recommends clarifying that along roadsides, especially along numbered County Roads, like kind species with the landscape will be planted, but not in attempt to grow right of ways (specifically borrow ditches) to the same plant composition as surrounding rangeland. Moffat County has specifically created a seed mix that tolerates plowing and regular equipment maintenance along BLM right of ways after construction projects. This seed mix is does not conform to the standards in Appendix O, but is determined to be the best mix for road construction situations. We recommend clarifying that Appendix O can be modified as better reclamation species become available.	Appendix O has been revised in the Proposed RMP/Final EIS to include additional detail and clarification on reclamation standards and processes. As noted in Appendix O, “the Authorizing Officer must approve the specific seed mix, reclamation techniques, and other details proposed by the operator.” Therefore, review and approval of specific seed mixes would be addressed on a case-by-case basis, addressing site-specific conditions.
Appendices	The Nature Conservancy in Colorado	In addition, please address the following issues for Appendix O: • State up front, “This appendix applies to energy development [and any other applicable resource uses].” • Identify the consequences of not reclaiming disturbed areas (e.g., BLM will retain the bond until successful reclamation is accomplished). • Explain who will do the monitoring required in the following statement, “For both short- and long-term projects, vegetative establishment will be monitored annually.” • Explain who will provide the annual reports as required in the 3rd paragraph. BLM botanists? Oil and gas operators? Others?	Appendix O is referenced several times in chapter 2 in relation to which activities it would be applied. There is no need to restate which activities would be required to adhere to the reclamation standards. Additionally, the consequences to the lessees of not reclaiming to these standards is addressed in chapter 2 of the Proposed RMP/Final EIS, specifically that no additional disturbance would be allowed beyond the given disturbance ceiling. Concerning who will perform monitoring and provide the final reports, the language in the Draft RMP/EIS is sufficiently clear. The first sentence of the appendix notes that it is the lessee’s responsibility to use "reclamation practices." The activities that constitute those reclamation practices are defined throughout the Appendix, but if the responsibility to perform those activities is not specifically identified, it would default to this first sentence, that is, the lessee. The way the text is written clearly supports this, as the sentence that precedes the monitoring statement refers to salvaging topsoil. Obviously, BLM

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			will not be salvaging topsoil, but requiring the lessee do so. In the third paragraph it notes that the annual report "will be provided to the Little Snake Field Office." From these statements and the way the document is written, it is sufficiently clear that the lessee's will be performing these activities and that it is the lessee's responsibility, under the definition of "reclamation practices" to provide BLM with the annual report.
Appendices	The Nature Conservancy in Colorado	3. More clearly define criteria for considering exceptions, modification, or waivers to oil and gas development (Appendix E). Appendix E lists criteria for considering exceptions, modification, or waivers to oil and gas activities. The appendix states that the criteria are "a starting point and could change depending on developing science" (p.E-1). Sample criteria that BLM lists include population levels/status/trends, drought, breeding site/area, etc. We strongly urge BLM to modify the list of criteria to ensure that the public and operators understand how the criteria will affect BLM's decision. Consider developing a table in place of the bullets that are currently in the section, "Criteria for considering exceptions, modifications, or waivers" (p.E-1).	Additional detail has been added to the criteria presented in Appendix E of the Proposed RMP/Final EIS.
Appendices	The Nature Conservancy in Colorado	Appendix F (general) - Some reorganization and clarification of this appendix would greatly enhance the reader's understanding of the intended use of the criteria. Suggestions: The general current format is as follows: - Resource issue (e.g., OHV designations) *Process, *Criteria. Consider adding a section - "description of activity planning" – before process for each resource issue. Consider renaming "process" to "purpose of criteria." For each process/purpose of criteria section, clearly state, "BLM will use the criteria to…" Ensure that each resource issue has these three sections. At present, the following resource issues do not have process and/or criteria sections: Data Collection and Monitoring, Yampa River Corridor, Reserve Conservation Allotments. Create tables for each set of criteria to describe how each criteria may affect BLM's decisions about whether to do X, Y, or Z. We provided an example for Appendix E that could be replicated.	The various decisions made through the planning process at the activity level are identified in Appendix C of the BLM planning handbook (BLM-H-1601-1). The handbook is readily available to the public and repeating the decisions here would only serve to add volume to the document. Appendix F was revised in the Proposed RMP/Final EIS to remove all the headers under each resource issue, eliminating the inconsistency between resources. Additionally, increasing detail to include the purpose of each criterion would add encyclopedic-like information to describe to the public the ecological reasoning behind why a resource's given characteristic should be used to make future decisions. Information needed to identify the existing environment and support the alternatives and analysis is contained in chapter 3. Finally, creating a table that includes all possible ways of how consideration of a given criteria may affect BLM's decision would result in an extremely large volume that requires speculation of potential scenarios and how the given criteria would

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			be applied. To provide a more limited set of examples could lead the reader to believe that the criteria would only be applied in those scenarios, causing further confusion. BLM prefers the existing format.
Appendices	The Nature Conservancy in Colorado	Appendix F, Data Collection and Monitoring (p.F-2): This section seems out of place in this appendix. All the other resource issues in this appendix pertain to specific locations (e.g., Yampa River Corridor) or resource uses (e.g., OHV designations). Suggest moving this section to its own appendix. Explain how BLM will use monitoring results to make better decisions. An example would be helpful. Explain what kind of decisions the monitoring results will help BLM make.	BLM believes Appendix F is an appropriate appendix to explain future data collection and monitoring, as this is a component of subsequent activity planning. The following text on Page F-2 explains how monitoring will help BLM make better decisions: "The constantly changing resource conditions create a challenge to management. Field data and observations will help make decisions better by— -Measuring factors that indicate the condition of the RMPPA -Increasing understanding of impacts by direct observation -Increasing the effectiveness of project analysis by employing actual data -Evaluating the progress toward management goals -Helping develop effective and appropriate mitigation measures -Providing information on the success of management practices and policies." The exact decisions that BLM will make in response to monitoring data cannot be predicted at this time. It would depend directly on the data collected and on-the-ground conditions at the time a decision is made.
Appendices	Wilderness Society (The), et. al.	4. Reclamation standards should be based on successful revegetation of native species: The reclamation approach set out in Appendix O includes useful definitions and measurements for successful reclamation, including: - basal cover of perennial species ("preferably native") adapted to the area is at least 90% of cover plus some presence of woody species; - appropriate diversity based on perennial genera and species – one species cannot make up more than 50% of perennial vegetation; - self-regenerating plant communities evident if in good vigor and evidence of successful reproduction; and	Appendix O has been revised in the Proposed RMP/Final EIS to add detail to successful final reclamation, as well as the identification of minimum reclamation actions.

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		- surface stability – based on limited soil movement and erosion channels are less than 1 inch in depth and at intervals greater than 10 feet. However, the standard is then undercut by providing that if reclamation is not deemed successful after two growing seasons, then: - if erosion is greater than 2 times allowable, “corrective action” would be required of the “responsible company”; and - if erosion is at or less than this threshold and BLM determines the site may become stable, then no corrective action would be required and, if this holds for another season, then the standard is considered met. Recommendations: In order to meet NEPA’s requirement that a mitigation measure be reasonably likely to be enforced and effective, this latter section needs to provide more detail as to the type of corrective action that would be required – such as, additional planting and active watering – so that operators cannot object to requirements for more reclamation efforts. Further, the requirement for revegetation cannot be exchanged for erosion control. While stabilization is an important part of reclamation, stabilization alone will not restore functional habitat or naturalness. Accordingly, successful revegetation must be required prior to deeming reclamation complete.	
Appendices	Wilderness Society (The), et. al.	While we support many aspects of the overall approach to adaptive management, such as the specific indicators and acceptable levels of change, the commitment to funding for monitoring, and the use of a fallback prescription. However, additional details regarding actions that will be taken if levels of change are unacceptable need to be included. This specificity is necessary in order for adaptive management to meet NEPA’s standards for mitigation measures that are likely to be effective and enforced. Further, monitoring commitments and criteria should also be included for other key resources, such as lands with wilderness characteristics, wild and scenic river segments and ACECs. Indicators can include the status of wilderness characteristics, outstanding river values, and the relevant and important values for which ACECs have been designated.	Appendix M describes the adaptive management framework BLM would employ when implementing the Proposed RMP. It was not intended to contain resource-specific targets or trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets or triggers should be adapted, this would not be possible without a land use plan amendment. In addition, committing beforehand to take a particular action if a trigger point were exceeded would be inappropriate. Guessing at what management action is needed before knowing the specifics might not rectify the problem and could even make the situation worse. BLM cannot know the specific resource conditions present in a future situation before the action is even initiated, and therefore

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			cannot speculate on a solution that would always correct the problem. Appendix M states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. Appendix M does explain the process that BLM would employ when making system-level or project-level adjustment if adaptive management is triggered for the various resources (See “Step 4: Making System-Level Changes” on page M-6 and “Step D: Make Project-Level Changes” on page M-9). BLM concurs that monitoring is an important component to land use planning and proper land management. Appendix F provides a description of general monitoring activities in the field office. Additionally, a discussion of system-level monitoring will be included in the Assessment Guidance Document as part of the adaptive management process to be employed in the implementation of Alternative C (Proposed RMP). The development of more specific monitoring systems is addressed at the activity level and is not an RMP-level decision.
Appendices	Wilderness Society (The), et. al.	The purported “adaptive management” approach to oil and gas leasing, though, is unacceptable and does not meet NEPA’s requirements for mitigation measures. For oil and gas leasing, Appendix F simply refers to Appendix E (Procedures and Criteria for Granting Exception, Modification or Waiver) as setting out the “process and criteria” for managing oil and gas leasing stipulations. Elsewhere, the Draft RMP also refers to granting of waivers, exception and modifications of oil and gas lease stipulations as based on a form of adaptive management, set out in Appendix E stating: Commodity production would be balanced against wildlife and vegetation protection; however, exceptions would be granted according to adaptive criteria established (Appendix E). Protection of greater sage-grouse and other wildlife habitat characteristics would be maintained or increased. Draft RMP, pp. 2-6–2-7. Appendix E does not identify potentially affected resources, any approach to measuring those affects or description of actions that will be taken. Instead, this Appendix presents a list of “criteria,” such as “weather severity,” “timing” and “cumulative effects,” without	Additional detail has been added to the criteria presented in Appendix E of the Proposed RMP/Final EIS. BLM believes Appendix F is an appropriate appendix to explain future data collection and monitoring, as this is a component of subsequent activity planning. The following text on Page F-2 explains how monitoring will help BLM make better decisions: "The constantly changing resource conditions create a challenge to management. Field data and observations will help make decisions better by— -Measuring factors that indicate the condition of the RMPPA -Increasing understanding of impacts by direct observation -Increasing the effectiveness of project analysis by employing actual data -Evaluating the progress toward management goals

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		specifying which criteria could apply to justify waiver, exception or modification or distinguish among the many stipulations that could be applied. There is no commitment to monitoring, no range of acceptable change and no description of the different actions that may be acceptable in certain situations. As a result, Appendix E cannot be considered a form of adaptive management or a suitable mitigation measure for the effects of oil and gas development or the need for lease stipulations to be applied. Instead, a commitment to data collection and monitoring, as well as indicators, levels of acceptable change and required actions should be set out and applied.	-Helping develop effective and appropriate mitigation measures -Providing information on the success of management practices and policies." BLM agrees that Appendix E cannot be considered adaptive management. The reference to "adaptive criteria" was removed. BLM has never contended that the exception, modification and waiver process constitutes mitigation. The exact decisions that BLM will make in response to monitoring data cannot be predicted at this time. It would depend directly on the data collected and on-the-ground conditions at the time a decision is made. Appendices E and F would work in concert with each other to implement the oil and gas stipulations, adjusting them when monitoring shows that the resource to be protected could still be protected through less restrictive means.
Appendices	Wilderness Society (The), et. al.	An example of sufficiently detailed adaptive management approach is contained in the Record of Decision for the Jack Morrow Hills Coordinated Activity Plan, prepared by the Rock Springs (WY) BLM Field Office. Appendix 2 (Implementation, Monitoring, and Evaluation Process) provides the specificity needed to evaluate the planned adaptive management program (and is available on line at http://www.blm.gov/style/medialib/blm/wy/jmhcap/rod.Par.37876.File .dat/02appendices.pdf and attached). We particularly note the following, as examples of the sort of detail that should be contained in the Little Snake RMP: • Table A2-1 Resource Management Indicators - p. A2-7 ¡V contains a broad set of indicators • Table A2-2 Indicator Detail - pp. A2-8 ¡V A2-10 ¡V contains multiple sources for data • Table A2-3 Measurement Detail - pp. A2-11 ¡V A2-13 ¡V contains measures of change and triggers for management actions • Figure A2-2 CAP Management Process - p. A2-15 ¡V provides a useful illustration of the adaptive management process The approach in the Draft RMP contains many important elements in Appendix M and Appendix F. However, as noted above, there are additional elements that should be included in the adaptive management process. We refer the BLM to the referenced sections	Appendix M describes the adaptive management framework BLM would employ when implementing the Proposed RMP. It was not intended to contain resource-specific targets or trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets or triggers should be adapted, this would not be possible without a land use plan amendment. Appendix M states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. Appendix M does explain the process that BLM would employ when making system-level or project-level adjustment if adaptive management is triggered for the various resources (See "Step 4: Making System-Level Changes" on page M-6 and "Step D: Make Project-Level Changes" on page M-9). BLM believes Appendix F is an appropriate appendix to explain future data collection and monitoring, as this is a component of shifting management when

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		of the Jack Morrow Hills Coordinated Activity Plan as an example.	necessary and subsequent activity planning. The exact decisions that BLM will make in response to monitoring data cannot be predicted at this time. It would depend directly on the data collected and on-the-ground conditions at the time a decision is made. Appendices M and F would work in concert with each other to implement and monitor the RMP decisions in accordance with the principles of adaptive management.
Appendices	Wilderness Society (The), et. al.	• Adaptive management should start small and pace development with level of learning. In the early stages of the Little Snake RMP, actions that may cause environmental impact should be limited until such a time where inventory, monitoring, and analysis can confirm that the resources are tending toward the desired goal.	The difficulty with such an approach that paces development with the level of learning is that there is no measure or trigger for when enough has been learned to adjust the pace of development up or down. BLM will continue to implement the direction from CEQ in using the best available science to make decisions, allocate uses, and develop mitigations. Through the adaptive management process discussed in Appendix M there could be course corrections over time as monitoring, as described in Appendix F, provides information on the success of the management decisions and the implemented mitigations. This type of an approach is consistent with the principles of FLPMA and NEPA and support continued progress, though measured and monitored.
Appendices	Wilderness Society (The), et. al.	• Define in detail what the adaptive management process will and will not address. BLM should prepare a monitoring protocol that guides whether or not BLM plans to use adaptive management with specific resources. The Draft RMP should also describe the resources and specific indicators that will be measured and used to determine adaptive management so that the public can provide meaningful comments on BLM's proposed approach to adaptive management.	Appendix M describes the adaptive management framework BLM would employ when implementing the Proposed RMP. It was not intended to contain resource-specific targets or trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets or triggers should be adapted, this would not be possible without a land use plan amendment. Appendix M states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. Appendix M does explain the process that BLM would employ when making system-level or project-level adjustment if adaptive

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			management is triggered for the various resources (See “Step 4: Making System-Level Changes” on page M-6 and “Step D: Make Project-Level Changes” on page M-9). BLM concurs that monitoring is an important component to successfully implementing the adaptive management approach. Appendix F provides a description of general monitoring activities in the field office. Additionally, a discussion of system-level monitoring will be included in the Assessment Guidance Document as part of the adaptive management process to be employed in the implementation of Alternative C (Proposed RMP). The exact decisions that BLM will make in response to monitoring data cannot be predicted at this time. It would depend directly on the data collected and on-the-ground conditions at the time a decision is made.
Appendices	Wilderness Society (The), et. al.	• Ensure adequate baseline prior to starting adaptive management and identify indicators. BLM should prepare detailed analysis of current inventory status to accompany the RMP that clearly specifies resources that may be affected by various activities and their baseline condition, then identify indicators for resources or groups of resources that will demonstrate the effects of management decisions. The RMP should also identify those resources or locations for which BLM lacks inventory data and establish a timeframe to accomplish inventories for resources or locations where data is lacking.	The difficulty with an approach that delays the start of the adaptive management approach is when one finally knows that enough baseline has been collected. As required by FLPMA, BLM will continue to gather inventory information as budget and personnel allow. BLM will also continue to implement the direction from CEQ in using the best available science to make decisions, allocate uses, and develop mitigations. Through the adaptive management process discussed in Appendix M there could be course corrections over time as monitoring, as described in Appendix F, provides information on the success of the management decisions and the implemented mitigations. This type of an approach is consistent with the principles of FLPMA and NEPA and support continued progress, though measured and monitored. As the adaptive management process is implemented, the areas/fields where data is lacking will become evident and BLM will implement the approach addressed in Appendix F to gather the data needed to make informed adjustments to management, as described in Appendix M.
Appendices	Wilderness Society (The),	• Set out detailed monitoring plan and ensure agency commitment to fund monitoring.	BLM concurs that monitoring is an important component to successfully implementing the

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	et. al.	A detailed monitoring plan is crucial for assessing potential impacts on resource conditions, ensuring that indicators are measured at regular and consistent intervals. Commitment of adequate resources for administration of this adaptive management process should be firm and sufficient to support the full implementation of adaptive management. Funding for adaptive management should not be dependent on shifting the financial and personnel burden to various user interests or other cooperating community groups.	adaptive management approach. In fact, the Adaptive Management Filter in Appendix M of the Proposed RMP/Final EIS states that adaptive management would not take place unless there was a firm funding and workload priority commitments to conduct monitoring. Step 2 in Appendix M explains the importance of monitoring and generally how information will be gathered and used as part of the adaptive management process. In addition to general process identified in Appendix M, Appendix F of the Proposed RMP/Final EIS also provides information on the data collection and monitoring process. A discussion of monitoring protocols to be employed will also be included in the Assessment Guidance Document, which will be completed before the adaptive management process is fully implemented. However, the exact methodologies and schedule for monitoring are more dependent on budgets and staffing levels, which are not RMP issues. Congress and administration personnel develop budgets that the Field Office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation. The adaptive management approach is not intended to be a tool to secure additional funding for the Little Snake Field Office, but as a means to adapt management decisions in the face of uncertainties as outcomes from management actions and other events become better understood.
Appendices	Wilderness Society (The), et. al.	• Include defined limits of acceptable change in resource conditions and specify actions to be taken if change reaches or exceeds those limits. For all indicators, the RMP should identify the range of acceptable change from the baseline condition, using best available science, and specify those actions that will be taken in the event that unacceptable levels of change are identified.	The goals and objectives identified as part of the RMP chapter 2 are the guidance for the condition the various resources and uses are to be managed for. Appendix M specifically states that “because resource objectives are…an important element of an [adaptive management] process, they would need to be rewritten in the [Assessment Guidance Document] to be quantifiable so progress towards meeting the objectives is measured during the system-level assessment.” As in all cases, in developing these quantifiable measures of the objectives, BLM will use the best available science.
Appendices	Wilderness	• Have a “fallback” plan should monitoring or other aspects of the	BLM agrees a fallback plan is necessary and

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	Society (The), et. al.	adaptive management process not be fully carried out. Adaptive management must include requirements for when and how the proposed outcome will be reevaluated if it is not being met. The agency's ability to reevaluate or amend desired outcomes should not be the sole fallback if either the adaptive management process is not working or outcomes are not being met. BLM should build into the Little Snake RMP provisions to address situations based on new information, circumstances, regulatory requirements, or discontinued agency funding for monitoring that would trigger a plan amendment or revision under a new EIS.	discussed this process in the Draft RMP/EIS. See Section 2.4 of Appendix M for a description of when and how fallback prescriptions would be employed. Public land management is a dynamic process that is dependent on inputs from a number of sources that could be made at any time. However, to enable public land management agencies to actually make decisions, FLPMA and NEPA both allow for decisions to be made based on the best available information. The adaptive management process is a means to adapt management decisions in the face of uncertainties as outcomes from management actions and other events become better understood. However, the management decisions do have to be based on something. If new information was gathered that should trigger a change in the adaptive management objectives, the RMP would have to be amended since the quantifiable adaptive management objectives are based on the RMP objectives. If new laws or regulations were completed that the RMP decisions were not in conformance with, the RMP would have to be amended. This system is already in place and is described in BLM's planning handbook (BLM-H-1601-1).
Appendices	Wilderness Society (The), et. al.	• Process should be managed so citizens can actively and effectively participate. The adaptive management process should be managed so that the public can actively and effectively participate. This resource area is broad, involving millions of acres; citizens interested in the resources governed by the Little Snake RMP reside across three counties; and, involvement of citizens in adaptive management processes can be both timely and costly to individuals. BLM should, in addition to seeking funding commitments for fund monitoring and analysis, seek funding for citizen participation. BLM should also begin planning now as to how citizen involvement in adaptive management will meet the requirements of the Federal Advisory Committee Act, and such planning should not be left only to those citizens or community groups wishing to collaborate or advise BLM.	As noted in the Draft RMP/EIS, DOI and BLM guidance on adaptive management emphasizes the importance of collaborative implementation of the adaptive management process. However, the language in the Draft RMP/EIS also states that "Collaboration would be encouraged but not required for an AM project to move forward." Also as noted in the Draft RMP/EIS, "The specific role of the public would be detailed during the creation of the Assessment Guidance Document" to be developed "collaboratively within a 2-year period after the record of decision is signed" and it will include "the role of stakeholders." Concerning exactly how the public would be involved, that will specifically be addressed in the Assessment Guidance Document, but the Appendix M does note that "A balanced stakeholders

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			or public group could participate in the process in an advisory capacity. This group could be either formal (Federal Advisory Committee Act [FACA]-chartered) or informal in nature."
Appendices	Yates Petroleum Corporation (through agent)	Appendix M Adaptive Management. Yates is very opposed to the AM process that involves the public on the initial planning or monitoring phase. The proponent and the BLM should devise a plan then submit it to the public for comment. The proposal outlined in this appendix is cumbersome at best. The FACA AME at Pinedale in Wyoming is unworkable. The BLM cannot keep up with the process and the public has given up on actually getting ideas to the BLM that they will use. The procedure is oppressive and moves at glacial speed. The process used for this RMP illustrates that the NGOs opposing all oil and gas activity as well as logging and grazing all want a seat at the table but are unwilling to come to consensus. This situation is outlined by Claire Moseley of PLA.	As noted in the Draft RMP/EIS, DOI and BLM guidance on adaptive management emphasizes the importance of collaborative implementation of the adaptive management process. However, the language in the Draft RMP/EIS also states that "Collaboration would be encouraged but not required for an AM project to move forward." Also as noted in the Draft RMP/EIS, "The specific role of the public would be detailed during the creation of the Assessment Guidance Document" to be developed "collaboratively within a 2-year period after the record of decision." As a process associated with the management of public lands, BLM is legally required to implement an open, public decision-making process.
Appendices	Yates Petroleum Corporation (through agent)	Appendix O Reclamation. Page 2 The requirements to determine reclamation are too specific and rigid. They do not allow a good BLM staff person to make judgments in difficult cases. There is a typo in the first sentence of the first bullet where at lease should be at least.	Appendix O has been revised in the Proposed RMP/Final EIS to include additional detail and clarification on reclamation standards and processes. As noted in Appendix O, "the Authorizing Officer must approve the specific seed mix, reclamation techniques, and other details proposed by the operator." In combination with the requirements contained in the revised Appendix O, this will ensure that public lands impacted by mineral exploration and development are reclaimed, as well as allowing for flexibility based on the Authorizing Officer's approval.
Areas of Critical Environmental Concern	William Baker	The document says (p. 3-87) that "increased use and surface disturbance activities (particularly OHV use) pose a threat to the relevant and important values in…Irish Canyon ACEC…" and "Recreation use in the Irish Canyon ACEC has resulted in damage to rock art sites..." Given these findings, I strongly encourage BLM to go beyond the preferred alternative and close Irish Canyon to OHV usage, as it is clear that OHV usage poses a threat to the values of this important area.	The Proposed RMP/Final EIS was revised to eliminate the contradictory language in this section and to clarify the specific relevant and important values being threatened by surface disturbing uses. These changes also incorporate the fact that OHV use on existing or designated roads and trails is not considered a surface disturbing activity. Further, the revised text clarify that it's not the recreation use that was resulting in damage to cultural sites, but vandalism, which is an enforcement issue. Cultural and rare plant relevant and important values are currently protected by NHPA and BLM policy to avoid

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			disturbance to these resources.
Areas of Critical Environmental Concern	William Baker	Limestone Ridge ACEC protection should be retained and strengthened; however, it is disturbing to see that BLM proposes, under Alternative C (the Preferred Alternative) to drop the ACEC designation for Limestone Ridge and under Alternative B all the ACEC designations would be dropped. The explanation given in the document is on p. 2-39 and 2-40, under Alternative C, where it says "The ACEC designation would be removed because special management attention would not be required to protect the relevant and important values." The current (Alternative A) OHV closure would be removed under Alternative C. This is an unexpected preferred alternative, given that the document later (p. 3-87) says that "increased use and surface disturbance activities (particularly OHV use) pose a threat to the relevant and important values in Limestone Ridge ACEC/RNA...and Lookout Mountain ACEC."	The Draft RMP/EIS chapter 2 (page 2-211) identifies OHV management for the Limestone Ridge ACEC area under Alternative C as closed to OHV use, as does Map 2-47. Page 2-39 incorrectly omitted any management for OHV use for this area under Alternative C. The Proposed RMP/Final EIS has been revised to include the OHV closure on page 2-39. Additionally, the language the commenter refers to in chapter 3 has been revised in the Proposed RMP/Final EIS to eliminate the contradictory language in this section and to clarify the specific relevant and important values being threatened by surface disturbing uses. These changes also incorporate the fact that OHV use on existing or designated roads and trails is not considered a surface disturbing activity. Finally, because the management prescriptions under Alternative C are sufficient to protect relevant and important values, designation as an ACEC is not necessary.
Areas of Critical Environmental Concern	William Baker	For Limestone Ridge and Lookout Mountain, the difference between the current situation (Alt. A) and the preferred alternative is that under the preferred alternative, the ACEC designation would be removed and the area would remain open to oil and gas exploration and to OHV usage, but Limestone Ridge would be recommended for withdrawal from mineral location, while Lookout Mountain would remain open. Thank you for proposing to withdraw Limestone Ridge from mineral location, something I strongly support, but this is also needed for Lookout Mountain.	The Draft RMP/EIS considers recommending the Lookout Mountain ACEC for withdrawal from locatable mineral development under Alternative D. The impacts from removing the recommendation for withdrawal is analyzed in the Draft RMP/EIS (page 4-130).
Areas of Critical Environmental Concern	William Baker	I suggest the ecological value of Limestone Ridge and Lookout Mountain are so high that BLM should proceed with withdrawing both of these area from mineral entry, retain the ACEC designations and for both of them add formal designation as a federal Research Natural Area, including formal withdrawal from mineral entry, no livestock grazing, no OHV usage, no oil and gas exploration or development, the highest VRM designation, closure to coal leasing, and exclusion of ROWs except for valid existing leases.	The Draft RMP/EIS impact analysis notes that the relevant and important values from the two ACECs mentioned by the commenter will be protected from irreparable damage without the use of a designated ACEC. The Draft RMP/EIS already considers many of the commenter's suggestions in Alternative D. Chapter 4 of the Draft RMP/EIS also analyzes the impacts from implementing the protective management, as well as the impacts from removing the ACEC designation and managing as noted in chapter 2. For those items not noted in the Draft RMP/EIS, response is as follows:

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			- closing these areas to livestock grazing is not necessary as livestock grazing was not identified as a potential risk to the relevant and important values. In addition, as the relevant and important values are special status species, BLM is empowered by policy to implement protective management at the activity level. Therefore, any potential impacts from livestock grazing would be addressed in NEPA documents associated with term permit renewals for these areas. - Adding another designation (Research Natural Area) would carry no additional protections in and of itself. In managing public lands, the designation itself does not provide the protection, but the stipulations associated with a given designation. As noted in chapter 4 of the Draft RMP/EIS, the stipulations on these areas, in the absence of a special designation, are sufficient to protect them from irreparable damage. - Closing the Lookout Mountain ACEC area to all OHV use would not provide more protection than limiting OHV use to the designated routes currently on the ground. The impacts from the designated routes have already occurred, and continued use on these routes will not result in increased impacts to the relevant and important values. Additionally, a collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in limited Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Some areas of the RMPPA has already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. Impacts from future route designation will be analyzed in the NEPA document(s) associated with those decisions. - Closing the Lookout Mountain ACEC area to oil and

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			gas leasing is not a necessary action to protect the relevant and important values from exploration or development. As noted in chapter 4 of the Draft RMP/EIS, managing the area with CSU stipulations would require any exploration or development activities to avoid relevant and important values.
Areas of Critical Environmental Concern	William Baker	These three ACECs (Limestone Ridge, Irish Canyon, and Lookout Mountain) are a very small part of the BLM land base in this area, but all three contain irreplaceable rare vegetation in excellent condition and rare plants. The document explains the high value of these three ACECs and that all three are threatened by increased OHV usage, yet the preferred alternative would remove ACEC designation for two of the three and allow OHV usage. I strongly encourage BLM to instead retain designation of all three ACECs and increase protection of these three sites by providing them all with the full suite of available protections: 1. Add formal designation as federal research natural areas 2. Withdrawal from mineral entry; closure to any mineral activity 3. Closure to OHV usage 4. Closure to further oil and gas leasing, exploration, and no surface occupancy of existing leases 5. Closure to coal leasing or development 6. Highest VRM designation 7. No new communication sites 8. Exclusion area for ROWs except valid existing rights 9. No livestock grazing. I encourage BLM to fence all three ACECs where there is any possibility of livestock entry. 10. Establish an active program to control invasive species	As part of the process for developing the Little Snake RMP, the BLM planning team reviewed the relevance and importance of resources associated with the existing ACECs located in the planning area. As explained in the Draft RMP/EIS, this process determines whether the relevant and important values of each ACEC are still present and require continued special management attention, whether threats of irreparable damage are identified, and whether current management is sufficient to protect these values. ACEC evaluation located in the Little Snake Planning area is provided in Appendix G, and the analyses that provide the rationale for the decision to designate or terminate an ACEC is located in chapter 2 of the Proposed RMP/Final EIS. While the Preferred Alternative will remove the ACEC designations for Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon, management actions have been prescribed to ensure protection and prevention of irreparable damage to important and relevant values associated with each site even without ACEC designation. In accordance with BLM Manual 1613-1.12, BLM identified special management for potential ACECs and existing ACECs in an array of management alternatives presented in chapter 2. Management considered in the Preferred Alternative was designed to protect endangered species, sensitive plants, remnant plant communities, sensitive habitat, scenic quality, and natural processes or systems or other important and relevant values identified for each area. Additionally, existing special management area designation provides full protection of values as in the case of Cross Mountain Canyon ACEC which is within Cross Mountain WSA, thus eliminating the need for special management attention afforded by an ACEC designation. The management action

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			proposed in the alternatives will offer management flexibility to ensure resource values are protected while allowing acceptable levels of resource use that includes mineral entry, livestock grazing, OHV use, and oil and gas development. Additionally, OHV management for these three areas does not change between Alternative A and Alternative C.
Areas of Critical Environmental Concern	Colorado Mountain Club	SPECIAL DESIGNATIONS/ACECs: Of concern is the de-emphasis in the preferred alternative of the ACEC form of special designation. There are many areas of critical environmental concern contained within the resource area. Even the existing management plan, contained within the draft EIS as alternative A, contains several areas that are delisted from the preferred alternative. My strong recommendation is that at the very least, existing ACECs for Irish Canyon, Lookout Mountain, Limestone Ridge & Cross Mountain Canyon should be a part of the preferred alternative. The agency should closely review the list of proposed ACECs contained within alternative D as monitoring and/or adaptive management are not sufficient in my view to protect these resources and values.	See General Comment Response #9
Areas of Critical Environmental Concern	Environmental Protection Agency (EPA), Region 8	ACECs are areas where special management attention should be given to protect and to prevent irreparable damage to important values, resources, systems, or processes, or to protect life and safety from natural hazards (section 202(c)('3) of FLPMA). The preferred alternative would have 11,910 acres in Irish Canyon set aside as an ACEC. Three other areas which currently have ACECs designation (Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon) are proposed to no longer have that status. It is not clear to EPA how BLM's multiple use assessment resulted in BLM's preference to eliminate the ACEC status of these areas or what environmental impacts are associated with removing ACEC status. EPA recommends that the EIS fully explain how its balancing of the various multiple uses resulted in BLM's preference to remove the ACEC status of these three areas and the environmental impacts associated with removing the ACEC designation.	The Proposed RMP/Final EIS has been revised to explain more clearly the impacts to ACECs from designation or no designation.
Areas of Critical Environmental Concern	Form Letter #2	Designate all 12 eligible Areas of Critical Environmental Concern to protect essential habitat for imperiled plants and prairie dog colonies.	See General Comment Response #9
Areas of Critical Environmental	Form Letter #3	All 12 eligible areas of "critical environmental concern" should be designated to protect essential habitat for imperiled plants, greater sage grouse and prairie dogs.	See General Comment Response #9

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Areas of Critical Environmental Concern	Form Letter #8	BLM must designate Areas of Critical Environmental Concern (ACEC) and require nonwaivable No Surface Occupancy stipulations to protect cultural resources as necessary.	See General Comment Response #9
Areas of Critical Environmental Concern	Rick Hammel	Areas of Critical Environmental Concern Page 2-37 The reduction of ACECs by 75% is unrealistic. It is our position that the ACECs in Alternative A should be retained and a select (if not all) number of ACECs from Alternative D must be included within the Final RMP.	See General Comment Response #9
Areas of Critical Environmental Concern	Henry Keesling	p. 2-171: Please add Irish Canyon ACEC to this list.	The Proposed RMP/Final EIS Alternative C was revised to close the Irish Canyon ACEC to mineral material sales. This change was reflected throughout chapter 2.
Areas of Critical Environmental Concern	Moffat County Commissioners	p. 2-37 Areas of Critical Environmental Concern (ACECs). Moffat County requests wording be added that clarifies, within ACEC's range improvements will be allowed to sustain affected operators per the goals and objectives of the Livestock section of the RMP. Although this may be implied, we request it be written so as to clarify to those who object to range improvements within ACEC's that range improvements are complementary of ACEC designations within the Little Snake Field Office.	The idea that the implementation of all types of range improvements would be automatically allowed and be viewed as complementary to ACEC designations is an overly broad and incorrect statement, and is not implied in the language contained in chapter 2 of the Draft RMP/EIS. There are several types of range improvements, some which may have no impact to ACEC relevant and important values under any circumstances and some which may result in major impacts depending on how, where, or when it were implemented. Impacts to an ACEC's relevant and important values would have to be considered on a case-by-case basis when implementing range improvement projects. This would be accomplished during NEPA compliance for each project. Any mitigation necessary to protect the values would be identified at that point.
Areas of Critical Environmental Concern	Moffat County Commissioners	2-39 Areas of Critical Environmental Concern Moffat County supports the logic BLM has used to remove Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon ACECs in Alternative C. However we are deeply opposed to alternative C placing Limestone Ridge as a Right of Way Exclusion area, as this may very well be a location for wind generation and the need for power lines into the future. Regarding Lookout Mountain, we strongly believe new rights of way allowances should occur to accommodate future communication sites and energy transmission	BLM is not aware of any future foreseeable actions that would conflict with designating Limestone Ridge as a ROW Exclusion area. Infrastructure could be routed around the small area. On Lookout Mountain, ROWs would be allowed upon approval of a site-specific development plan consistent with area resource objectives, which would accommodate future communication sites and energy transmission lines.

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		lines.	
Areas of Critical Environmental Concern	NW Colorado Oil and Gas Association	p. 2-37-ACEC-Areas of Critical Environmental Concern We agree with Moffat County in your assessment of removing Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon as ACECs in Alternative C. We are opposed to alternative C placing Limestone Ridge as a Right of Way Exclusion area as this may be a location for wind generation and need for power line in the future. This should never be taken out as an option.	BLM is not aware of any future foreseeable actions that would conflict with designating Limestone Ridge as a ROW Exclusion area. Infrastructure could be routed around the small area. On Lookout Mountain, ROWs would be allowed upon approval of a site-specific development plan consistent with area resource objectives, which would accommodate future communication sites and energy transmission lines.
Areas of Critical Environmental Concern	Mark Pearson	I am also astonished by BLM's decision to eliminate existing ACECs on Lookout Mountain and Limestone Ridge. This decision makes an extremely strong case for the critical need for permanent protection of these areas via wilderness designation, a level of protection that cannot be eliminated through administrative whim. I don't understand the rationale that these two areas do not need "special management attention" but then describes a variety of special management actions to protect the resources in the ACECs. There is no defensible justification for eliminating nearly all of the existing ACECs in the planning area, leaving just one substantial area left to represent the unique and diverse landforms of the planning area. It appears that Lookout Mountain ACEC has been eliminated in order to accommodate further oil and gas development, which is a dominant use that already occupies the overwhelming majority of the planning area. I have hiked through the Limestone Ridge ACEC and believe that the resource values present there deserve the level of management scrutiny and protection that accompanies ACEC designation. If BLM were instead to propose Limestone Ridge as wilderness, there might be no need for ACEC designation, but BLM also refuses to acknowledge the wilderness character of Limestone Ridge.	FLPMA and BLM policy does require designation of ACECs to protect representative areas of unique and diverse landforms, but to protect areas with identified values that meet relevant and important criteria and require special management. In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated and existing ACECs as specified in BLM Manual Section 1613-1. Evaluations were based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary and evaluation of these ACECs is located in Appendix G of the Draft RMP/EIS. There is no requirement to carry forward all of the potential ACECs into the Preferred Alternative. BLM's ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the Draft RMP/EIS. Alternative D analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the Proposed RMP/Final EIS will be provided in the Record of Decision (ROD). The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in chapter 4 of the Proposed RMP/Final EIS. Additionally, wilderness designation is accomplished by an act of Congress, and is therefore outside the decision-making scope of this RMP. The inventory and management of non-WSA lands with wilderness

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			characteristics is guided by BLM's revised Land Use Planning Handbook, H-1610-1, App. C.I.K. (effective 3/11/05), which directs BLM to identify decisions to protect or preserve wilderness characteristics, or manage for other uses or values. The Draft RMP/EIS analyzes management alternatives that range from protecting all non-WSA lands with wilderness characteristics to protecting none. BLM will decide through this planning process which lands will be managed to protect the values associated with wilderness characteristics and which lands will be managed for other resources values and uses.
Areas of Critical Environmental Concern	Matthew Roman	Any wildlife habitat eligible for Areas of Critical Environmental Concern status should be given that status.	See General Comment Response #9
Areas of Critical Environmental Concern	John Spezia	Areas of Critical Environmental Concern (ACEC) should be nominated and expanded beyond the dozen or so areas: riparian, wetlands, springs.	See General Comment Response #9
Areas of Critical Environmental Concern	Wes Stay	Does not adequately protect current or proposed ACECs or Sage Grouse and other sensitive species.	See General Comment Response #9
Areas of Critical Environmental Concern	The City Council of Steamboat Springs	Special Management Area: Area of Critical Environmental Concern (ACEC): Alternative C will retain designation of the Irish Canyon ACEC (11,190 acres) while removing Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon (total of 9,000 acres) from ACEC management. We support continued designation of Irish Canyon and urge BLM to retain designation of Limestone Ridge, Lookout Mountain, and Cross Mountain Canyon as ACECs. Furthermore, City Council supports consideration for all twelve eligible Areas of Environmental Concern to protect essential habitat for sensitive plant species, cultural resources, scenic qualities and other values.	See General Comment Response #9
Areas of Critical Environmental Concern	Vermillion Ranch Limited Partnership	Pg 2-37 ACECs must not effect Existing ROW corridors for future maintain up grade or expansion	The Draft RMP/EIS states that valid existing rights would be recognized (e.g., pages ES-15, 1-9, 2-44, 7-16). These rights would be recognized in the future, and maintenance and upgrades within the existing ROW and according to the ROW agreement would be allowed. However, actions that would

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			expand the development footprint outside the existing ROW would be subject to the decisions contained in chapter 2, including consideration of ACEC relevant and important values and management.
Areas of Critical Environmental Concern	Paul E. Weis	2. Designate additional Areas of Critical Environmental Concern to protect other communities of rare plants. Retain all existing Areas of Critical Environmental Concern.	See General Comment Response #9
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM failed to designate ACECs for the greater sage grouse, despite a recommendation to do so by Clait Braun, a leading expert on greater sage grouse. Greater sage grouse habitat protection is particularly important in the Little Snake Resource Area, which contains the largest, healthiest lek complex in Colorado (Comments of Clait Braun on the Draft RMP; see also Braun, C.E. 2004. Declaration re: APD for Focus Ranch, Federal #12-1 - attached.). This thriving complex, also one of the largest in the West, must be protected in the BLM's plan to ensure the future health of the species and continued vitality of the region. The greater sage-grouse was petitioned for Endangered Species Act protection, and the U.S. Fish and Wildlife Service made a positive preliminary finding that protection may be warranted. The Service later denied the grouse protection, but information has since come to light indicating that political appointee Julie MacDonald may have influenced this decision. In addition, new research has shown that sage-grouse are even more sensitive to disturbance related to oil and gas drilling than had previously been believed. Therefore, the Service is likely to revisit whether Endangered Species Act protection is necessary in the near future. In the interim, as BLM acknowledges in the Draft RMP, the Little Snake Resource Area "contains the largest Greater Sage-Grouse population in the State of Colorado." Draft RMP, p. 3-60. There are currently 5 local working groups developing management plans for this species, which will culminate into a Statewide Conservation Plan for this species. Through the National Science and Technology Center, the BLM is in the process of conducting "Greater Sage-Grouse Habitat Connectivity Mapping and Analysis Workshops." BLM Instruction Memorandum No. 2007-062. Two of the areas under consideration include portions of the Little Snake Resource Area, highlighting the importance of the sage grouse population. The results of these processes will undoubtedly contribute information further supporting the need to protect sage grouse populations in the	Because of new information that has been published since the development of the Draft RMP/EIS, management for the greater sage-grouse has been revised in the Proposed RMP/Final EIS. As noted in Appendix G of the Draft RMP/EIS, the nominated Sage-Grouse Conservation ACEC does not meet both relevance and importance criteria, and is therefore not eligible for consideration as an ACEC.

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		Little Snake Resource Area, by designating ACECs and applying scientifically-based protections from the impacts of oil and gas development and ORVs. The Draft RMP has failed to take necessary action.	
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	1. The decision to omit the retention of existing ACECs or designation of new ACECs in Alternative B violates FLPMA and BLM's internal guidance. As mentioned throughout our comments, BLM has placed the development of oil and gas and motorized recreation as a priority over protection of natural resources. The Draft RMP contemplates designating no ACECs under Alternative B - including removing designation for all existing ACECs. Draft RMP, p. 2-37). Analyzing an alternative which removes all existing ACEC designations and does not consider the designation of any ACEC does not comply with FLPMA or BLM Manual direction. BLM admits Alternative B fails to meet the mandates of FLPMA or its internal guidance by its very definition of Alternative C. Alternative C states, "Area protections such as designation as ACECs and WSRs would be limited to those areas where such designations are necessary to protect sensitive resources." Draft RMP, p. ES-6 (emphasis added). While Alternative C only retains the designation of the Irish Canyon ACEC, and is therefore out of compliance with FLPMA for its own reasons (as will be discussed in detail below), Alternative B clearly does not fall within FLPMA's mandate to prioritize the designation of ACECs. If BLM were to choose Alternative B, it would by its own omission, fail to protect even the one area it believes is absolutely "necessary" to protect. Recommendations: The Proposed Plan must be corrected to ensure that all alternatives analyzed comply with the law and with agency policy. At a minimum, Alternative B must be corrected to include the designation of the Irish Canyon ACEC.	BLM gave full consideration to designating and persevering ACEC during this land use planning process. BLM evaluated 93 ACEC nominations. Of these, 83 of these were sites within the LSFO identified as Potential Conservation Areas (PCA) by the Colorado Natural Heritage Program. Of those 83, 40 were dropped from further consideration because they did not meet any of the importance criteria. An additional 14 sites were eliminated from further consideration because the value(s) in question were not located on BLM-administered land. Two PCAs, Irish Canyon and Lookout Mountain, are existing ACECs, and two additional PCAs, North and South Vermillion Bluffs, are also located within the existing Lookout Mountain ACEC. These sites were eliminated from further consideration because they are within ACECs that were already being reviewed as part of the RMP revision. The remaining 25 PCAs meet the relevance and importance criteria because all of the sites contain a plant on the BLM Sensitive list or a plant community of concern to BLM. These 25 PCAs have been combined into 11 potential ACECs to be carried forward for analysis. Through analysis of relevant and important values, 16 met the criteria for designation as an ACEC. All 16 ACECs are proposed for designation in Alternative D, one ACEC is proposed for designation in Alternative C, and no ACECs are proposed for designation in Alternative B. These alternatives were considered to ensure a broad range of alternatives was considered to comply with NEPA regulations. Analysis of an alternative that contains no ACECs is imperative to determine what impacts would be to relevant and important values given no special management protection. Chapter 4 of the Draft RMP/EIS analyzes the alternatives and discloses the impacts of the proposed ACEC management prescriptions and protections.

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			The relevant and important values identified in the ACEC process are proposed for ACEC designation in one or more alternatives and in many cases where ACECs are not proposed for designation, these values are provided protective measures by other management actions. The management of ACECs is considered within the entire spectrum of BLM's multiple use mandate.
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM's Range of Alternatives, in Regard to the Designation of ACECs, Fails to Account for the Many Sensitive Resources Found in the Little Snake Resource Area. Alternative D states, "Area protections such as ACECs and WSRs would be maximized." Draft RMP, p. ES-6). Far from maximizing ACEC designation, Alternative D fails to provide adequate special management through ACEC designation for even the most imperiled resources. Center for Native Ecosystems nominated all Colorado Natural Heritage Program Potential Conservation Areas (PCAs) for ACEC designation. Appendix G does not clearly state the criteria that the BLM used to determine whether a nominated ACEC met the criteria for designation, but suggests that PCAs containing BLM Sensitive plants and/or G1/G2 (which the Heritage Program defines as "globally critically imperiled" or "globally imperiled") communities were found to meet relevance and importance criteria. However, Pot Creek and Whiskey Springs proposed ACECs in Alternative D are the only proposed ACECs designed for BLM Sensitive plants and/or G1/G2 communities that fully cover the BLM surface within the corresponding PCA (which is the Whiskey Springs East PCA in the case of the proposed Whiskey Springs ACEC). Many PCAs that do meet these criteria are not included in Alternative D's ACECs (or as ACECs in any other alternative) at all, or are only partially covered. The following PCAs contain BLM Sensitive plants yet are not analyzed in any alternatives: 1. Bassett Spring (also includes G1/G2 species) 2. Chicken Springs (also includes G1/G2 species) 3. Cold Springs Mountain Springs (also includes G1/G2 species) (Very High Biodiversity Significance) 4. Gates of Lodore (also includes T2 taxa) 5. Hackings Draw 6. Phillips Creek	BLM gave full consideration to designating and persevering ACEC during this land use planning process. BLM evaluated 93 ACEC nominations. Of these, 83 of these were sites within the LSFO identified as Potential Conservation Areas (PCA) by the Colorado Natural Heritage Program. Of those 83, 40 were dropped from further consideration because they did not meet any of the importance criteria. An additional 14 sites were eliminated from further consideration because the value(s) in question were not located on BLM-administered land. Two PCAs, Irish Canyon and Lookout Mountain, are existing ACECs, and two additional PCAs, North and South Vermillion Bluffs, are also located within the existing Lookout Mountain ACEC. These sites were eliminated from further consideration because they are within ACECs that were already being reviewed as part of the RMP revision. The remaining 25 PCAs meet the relevance and importance criteria because all of the sites contain a plant on the BLM Sensitive list or a plant community of concern to BLM. These 25 PCAs have been combined into 11 potential ACECs to be carried forward for analysis. Through analysis of relevant and important values, 16 met the criteria for designation as an ACEC. All 16 ACECs are proposed for designation in Alternative D, one ACEC is proposed for designation in Alternative C, and no ACECs are proposed for designation in Alternative B. These alternatives were considered to ensure a broad range of alternatives was considered to comply with NEPA regulations. Analysis of an alternative that contains no ACECs is imperative to determine what impacts would be to relevant and important values given no special

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		7. The Steps 8. West Boone Draw (also includes G1/G2 species) 9. Zenobia Peak East (also includes G1/G2 species) The following PCAs contain G1/G2 communities yet are not analyzed in any alternative: 1. Little Snake River at Cross Mountain, B3 2. Williams Fork, B3 Many of the PCAs are only covered because of the White-tailed Prairie Dog ACEC (designated in Alternative D, Draft RMP, p. 2-38), and may not be adequately protected even if that ACEC is designated in the Proposed Plan. Even the Gibben's Beardtongue ACEC does not cover all of the BLM surface included in the PCAs designed to protect this species. It is also noteworthy that none of the PCAs with the highest biodiversity value (B1- or B2-ranked) have all of the BLM surface included in the Alternative D ACECs. The Draft RMP provides no information about why BLM surface in these PCAs were not included in the proposed ACECs. The Natural Heritage Program designs PCA boundaries specifically to meet the needs of the imperiled elements that they contain, so without a thorough explanation by the BLM for why these areas were excluded it appears that even if these ACECs are designated in the Proposed Plan, they may not be effective at conserving rare elements. The following PCAs contain BLM Sensitive plants, yet only portions of the BLM surface are analyzed in Alternative D (the PCA name is followed by the proposed ACECs providing partial coverage): 1. Ace-in-the-Hole Draw (also includes G1/G2 community), White-tailed Prairie Dog ACEC 2. Browns Draw (also includes G1/G2 species) - Whiskey Springs Draw ACEC 3. Bull Canyon at Big Joe Basin - Bull Canyon ACEC 4. Bull Canyon - Bull Canyon ACEC 5. G Gap - G Gap ACEC, White-tailed Prairie Dog ACEC 6. Horse Draw (also includes G1/G2 community) (Very High Biodiversity Significance) - White-tailed Prairie Dog ACEC, Cold Desert ACEC 7. Irish Canyon (Very High Biodiversity Significance) - Limestone Ridge ACEC, Irish Canyon ACEC, Bull Canyon ACEC, White-tailed Prairie Dog ACEC	management protection. Chapter 4 of the Draft RMP/EIS analyzes the alternatives and discloses the impacts of the proposed ACEC management prescriptions and protections. The relevant and important values identified in the ACEC process are proposed for ACEC designation in one or more alternatives and in many cases where ACECs are not proposed for designation, these values are provided protective measures by other management actions. The management of ACECs is considered within the entire spectrum of BLM's multiple use mandate. BLM may use its discretion in developing the boundaries of ACECs, modifying nominated boundaries to best fit the location and needs of the relevant and important values. Likewise, BLM can use its discretion in determining what values meet the relevance and importance criteria. All the PCAs were evaluated in their entirety for relevant and important values. BLM determined that all species ranked as G1 and G2 meet the relevance and importance criteria. Biodiversity values were determined not to be a factor in meeting importance criteria. T rankings were also determined not to be a factor in meeting importance criteria. Several PCAs were eliminated from ACEC designation because the value in question, e.g., the rare plant occurrence or the rare plant community occurrence is not located on BLM-managed land. Through double-checking on the GIS database, it was confirmed that the plants in these locations do not occur on BLM-managed land; only the buffer extends onto BLM land. BLM lacks the authority to manage rare plants on privately owned land or land managed by another agency. The following PCAs were eliminated from consideration because the value does not lie on BLM-managed land: 1. Black Meadow (Occurrence lies on private) 2. Chicken Springs (Occurrence lies on private) 3. Dry Meadow (Occurrence lies on private) 4. Freeman Creek (Occurrences lie on private or

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		8. Lookout Mountain - Lookout Mountain ACEC 9. No Name Spring (also includes G1/G2 species) - No Name Spring 10. North Vermillion Bluffs - Lookout Mountain ACEC, White-tailed Prairie Dog ACEC 11. Pablo Spring (also includes G1/G2 community) - Bull Canyon ACEC 12. South Vermillion Bluffs - Lookout Mountain ACEC, White-tailed Prairie Dog ACEC 13. Spitzie Draw (also includes G1/G2 community, G1/G2 species, listed species) (Outstanding Biodiversity Significance) - Gibben's Beardtongue ACEC 14. Sterling Place (also includes G1/G2 species) (Very High Biodiversity Significance) - Gibben's beardtongue ACEC 15. Vermillion Bluffs West - White-tailed Prairie Dog ACEC, G Gap ACEC 16. Willow Spring at Cold Spring Mountain (also includes G1/G2 species) - Willow Spring ACEC The following PCAs contain G1/G2 communities, yet only portions of the BLM surface are analyzed in Alternative D ACECs: 1. Deception Creek - Deception Creek ACEC 2. Sellers Hole Ridge - White-tailed Prairie Dog ACEC 3. Shell Creek - White-tailed Prairie Dog ACEC, Cold Desert ACEC 4. Vermillion Creek Falls (Very High Biodiversity Significance) - Bull Canyon ACEC It is also unclear why the BLM limited its analysis of PCA relevance and importance criteria to whether the PCA contained BLM Sensitive plants only, as opposed to whether it contained BLM Sensitive animals. PCAs containing BLM Sensitive animals should also meet the relevance and importance criteria. The following PCAs contain habitat for BLM Sensitive animals, yet are not analyzed in Alternative D: 1. Black Meadow 2. Dry Meadow 3. Freeman Creek 4. South Fork Park 5. Tipton	USFS) 5. Gates of Lodore (Occurrences lies on Park Service) 6. Little Snake River at Cross Mountain (Occurrence lies on private) 7. Hackings Draw (Occurrence lies on Park Service) 8. Phillips Creek (Occurrence lies on private). 9. South Fork Park (Occurrence lies on private or Forest Service) 10. The Nipple (Occurrence lies on State) 11. The Steps (Occurrence lies on Park Service) 12. Tipton (Occurrence lies on private) 13. West Boone Draw (Occurrence lies on private) 14. Williams Fork (Occurrence lies on private) 15. Yampa River at Lily Park (Occurrences lie along private segments of the river) 16. Cold Spring Mountain Springs (Occurrence lies on State land) In addition, Bassett Spring ACEC is analyzed in Alternative D (p. 2-41). The Zenobia Peak East PCA is included in the Whiskey Springs ACEC, along with the Browns Draw and Whiskey Springs East PCAs.

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		The Colorado BLM's Sensitive species list has not been revised since 2000. Because the list is outdated, it is particularly important that the BLM also consider the Natural Heritage Program's current imperilment rankings when determining whether an element may deserve ACEC protection. Several PCAs contain G1/G2/T1/T2 species or subspecies (T rankings are identical to G ranks but are for trinomials - subspecies or varieties) yet are not fully covered by proposed ACECs in any alternative. Federal agencies (including the U.S. Fish and Wildlife Service under the direction of the Endangered Species Act) provide the same types of protections to imperiled subspecies/varieties as they do to full species, so G1/G2 and T1/T2 taxa should be afforded the same consideration in designating ACECs. Two of the PCAs listed below contain habitat for species protected under the Endangered Species Act, which should also make these areas a priority for designation of ACEC. The following PCAs contain T1/T2 species, yet are not analyzed in any alternative: 1. Buffham Place 2. Cedar Springs Draw 3. East Boone Draw 4. Zenobia Peak and Douglas Mountain The following PCAs contain G1/G2 species, yet only portions of the BLM surface are included in Alternative D: 1. Middle Yampa River (also includes Endangered Species Act listed species) (Very High Biodiversity Significance) - Little Juniper Canyon ACEC 2. Yampa River at Lily Park (also includes Endangered Species Act listed species) (Very High Biodiversity Significance) - Cross Mountain Canyon ACEC 3. Yampa River at Little Juniper Canyon (Very High Biodiversity Significance) - Little Juniper Canyon ACEC The BLM also misses the opportunity to conserve specific special status species by failing to propose any ACECs for BLM surface intersecting PCAs containing the following species (the species name is followed by the PCA names) in any alternative: 1. Colorado River cutthroat trout (Freeman Creek, South Fork Park) 2. Duchesne milkvetch (Gates of Lodore) 3. Ownbey's thistle (Hackings Draw) 4. Autumn willow (Phillips Creek)	

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		Only portions of BLM surface intersecting PCAs containing the following species are analyzed in Alternative D - no single PCA containing these species has its BLM surface fully proposed (the species name is followed by the PCA names) for designation as an ACEC: 1. Debris milkvetch (North Vermillion Bluffs, South Vermillion Bluffs) 2. Nelson milkvetch (Ace-in-the-Hole Draw) 3. Woodside buckwheat (Bull Canyon at Big Joe Basin, Bull Canyon Knob, Gates of Lodore, Irish Canyon, Pablo Spring, The Steps) 4. Ligulate feverfew (Bull Canyon at Big Joe Basin, Bull Canyon Knob, Irish Canyon) 5. Gibbens's penstemon (Spitzie Draw, Sterling Place) 6. Mountain clover (Irish Canyon, The Steps) Recommendations: All existing ACECs should be maintained under all alternatives. The BLM should ensure that all of the BLM surface in each of the PCAs listed above is analyzed as a potential ACEC in at least one alternative in the Proposed Plan. BLM should develop management prescriptions to protect the areas identified for protection by the Colorado Natural Heritage Program. Failing to fully protect B1/B2 PCAs (including those for Gibbens's penstemon) is an especially grave error.	
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM's Preferred Alternative fails to prioritize the designation of proposed ACECs. Appendix G of the Draft RMP makes a compelling case for the important values in many of the ACECs proposed in Alternative D. BLM, however, failed to include designation of these ACECs in its Preferred Alternative. This failure to designate areas which met the importance criteria is true even for currently designated ACECs; in fact, the BLM openly admits that the values for which these ACECs were originally designated are still present. Alternative D would retain the existing 4 ACECs as well as designate 12 new ACECs. The total acreage of protected land in Alternative D is 310,390 (Draft RMP, p. 2-38). All 16 of these ACECs were found to meet the relevance and importance criteria in Appendix G of the Draft RMP, yet the BLM's Preferred Alternative would only designate one ACEC, a total of 11,910 acres (Draft RMP, p. 2-38). Clearly, BLM has prioritized the development of oil and gas and motorized recreation over protection of resources, despite FLPMA's requirement that BLM, "give priority to the designation and protection of areas of critical environmental concern [ACECs]" when	There is no requirement to carry forward all of the potential ACECs into the preferred alternative. BLM's ACEC Manual (1613) requires that all potential ACECs be carried forward as recommended for designation into at least one alternative in the Draft RMP/EIS. Alternative D analyzed the designation of all potential ACECs. The rationale for designation of individual ACECs carried forward into the Proposed RMP/Final EIS will be provided in the ROD. The analyses that will provide the rationale for the final decision to designate or not designate an ACEC can be found in chapter 4 of the Proposed RMP/Final EIS.

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		preparing land use plans. 43 U.S.C. §1712(c)(3). Recommendations: In order to comply with FLPMA and BLM internal guidance (as outlined above), BLM should designate all ACECs in the Proposed Plan which have been found to meet the relevance and importance criteria and considered for designation in at least one alternative of the Draft RMP.	
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM's decision to use colony size as a filter in determining which white-tailed prairie dog colonies to protect is flawed. The Draft RMP uses colony size to determine whether or not disturbance will be allowed in occupied white-tailed prairie dog habitat. However, it is challenging to consistently map white-tailed prairie dog colony boundaries because this species does not clip vegetation to maintain clear lines of sight within colonies like black-taileds do, and white-taileds have a looser social structure which results in lower prairie dog densities and less clearly defined territories. The Colorado Division of Wildlife attempted on-the-ground mapping as well as aerial transects for white-tailed prairie dogs, but found that different observers produced different results. Colony size can change quickly because plague is present throughout the white-tailed prairie dog's range, so the BLM would need to reassess colony size before each proposed activity. The system that the Draft RMP proposes would conserve relatively small colonies while allowing for development in larger colonies even though these larger colonies have greater biological value. This proposal actually promotes habitat fragmentation and further collapse of the prairie dog ecosystem. Conserving white-tailed prairie dog habitat is key to conserving ferruginous hawks, mountain plovers, burrowing owls, and the potential for black-footed ferret habitat in this Field Office. White-tailed prairie dogs may persist in the 10-acres-or-less colonies that the BLM proposes to conserve, but these imperiled associated species are unlikely to tolerate such fragmented conditions. Recommendations: To save time, expense, and white-tailed prairie dog habitat, the BLM should simply disallow surface disturbance in prairie dog habitat regardless of colony size.	The stipulation the commenter is referencing would be applied to the all leases within white-tailed prairie dog habitat. Prior to any surface disturbance within this area, surveys associated with site-specific NEPA clearances would determine the size of the colony in question. This would result in assessing colony size prior to proposed activities, exactly as the commenter states. The commenter is also correct that the proposed action would preserve smaller colonies that are more sensitive to surface disturbance while allowing for some disturbance within larger colonies that could more easily adapt to, recover from, or absorb impacts associated with surface disturbances.
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	The BLM also proposes to disallow surface disturbance between April 1 to June 15 "to protect prairie dog pups" (p. ES-9). This is a laudable goal, but it does not conserve habitat, it just reduces disturbance and potential for mortality of naive pups. This seasonal stipulation also does not adequately cover the breeding season, and if surface disturbance disrupts breeding, there may be few pups to	The purpose of the seasonal stipulation would be to protect the young prairie dog pups, not to avoid disturbance during breeding. As the white-tailed prairie dog is neither a federally listed species nor a state species of concern, and according to the Colorado's 2006 Comprehensive Wildlife

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		benefit from the proposed timing limitation. Female prairie dogs are only sexually receptive for a few hours on a single day in a given year, so even very temporary disturbance can preclude an individual from breeding for a full year. While we believe that surface disturbance should be disallowed in prairie dog habitat at any time of year, if the BLM truly wishes to conserve reproductive output it should lengthen this timing limitation to include the full breeding season - a February 1 start date would be more appropriate.	Conservation Strategy the species has a medium population status with a stable trend, the need to protect the species during breeding season is low. For these reasons, the structure and timeframe of the stipulation in the Draft RMP/EIS is sufficient for the protection of this species.
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM failed to adequately protect white-tailed prairie dogs and their habitat. Appendix G states that the white-tailed prairie dog is a Species of Special Concern according to the Colorado Division of Wildlife. Unfortunately this is not the case. While the Division is working on a statewide management plan, it has not added the prairie dog to the Species of Concern list yet. It is, however, considered to be one of the Species of Greatest Conservation Need by CDOW. Conservation groups did petition for Endangered Species Act listing, and recent media reports have exposed how the negative petition finding was ordered by political appointee Julie MacDonald, so the negative finding may well be set aside shortly. After the petition was submitted, the states conducted their own Conservation Assessment and also found that the BLM's regulatory mechanisms were potentially inadequate. The final Conservation Assessment, approved by the Western Association of Fish and Wildlife Agencies (the umbrella group overseeing state wildlife agencies in the West) in January 2006 contains the following calls for ACEC designation for white-tailed prairie dog complexes: Critical areas identified during these analyses must be incorporated into Land Use Plans (e.g. RMPs) with conservation actions focusing on protecting unoccupied and occupied habitat, protecting corridors for immigration and emigration, and allowing maintenance and expansion of WTPD colonies and complexes. (p. 51) Special protection for large WTPD complexes should be employed by designating them as ACECs or "special management areas" on public lands. (p. 63) The Conservation Assessment also made specific recommendations about oil and gas drilling in white-tailed prairie dog habitat (see pages 52 and 70-71 of the agreement). The BLM fails to implement these recommendations in the Draft RMP. Recommendations: The BLM should include the White-tailed Prairie Dog ACEC in every	The commenter is correct that the Draft RMP/EIS Appendix G incorrectly notes that the white-tailed prairie dog is a Colorado Species of Special Concern. The white-tailed prairie dog is neither a federally listed species nor a state species of concern. Colorado's 2006 Comprehensive Wildlife Conservation Strategy notes the species has a "medium" population status (between low and abundant) with a stable trend, although the Science Forum (a March 2005 meeting of Colorado's scientific community) indicated that the species had a "pressing need". The Proposed RMP/Final EIS has been revised to reflect this. Simply designating an area an ACEC does not result in the automatic protection of everything within the area. Management associated with the ACEC is developed to protect the relevant and important values. If the values can be protected without designation of the ACEC, no ACEC designation may be needed. Based on the management contained in Alternative C of the Draft RMP/EIS, chapter 2, the relevant and important values could be protected without an ACEC designation. Additionally, the Draft RMP/EIS considered designation of the White-tailed Prairie Dog ACEC under Alternative D. Management associated with that Alternative would also protect the relevant and important values. The White-tailed Prairie Dog Conservation Assessment (January 2006) does not make specific recommendations about oil and gas drilling. Page 52 simply notes that "oil and gas development must be designed to minimize adverse impacts on existing WTPD colonies/complexes." Pages 70 and 71 are even more nebulous, noting that oil and gas

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		alternative, and should designate this ACEC in its Proposed Plan. To conserve the functional white-tailed prairie dog ecosystem complete with its complement of species like the black-footed ferret, ferruginous hawk, burrowing owl, and mountain plover, the BLM must conserve some large prairie dog habitat areas. The Little Snake Complex and the Wolf Creek Complex are Colorado's two best white-tailed complexes. Last year the Colorado BLM chose to lease the majority of the Wolf Creek Complex for oil and gas drilling, which makes it all the more important to work toward conservation of an alternate site for ferret reintroduction in Colorado. The BLM has everything else in place for ferret reintroduction in the Little Snake Field Office, except for prairie dog populations that are healthy enough, dense enough, and unfragmented enough to support ferrets, and also lacks the management direction to prioritize prairie dog and ferret management over conflicting uses. This is the key flaw in the entire ferret program. Only Alternative D would provide the buffers, connectivity, and absence of conflicting uses that could make ferret reintroduction viable in the Little Snake Field Office. Alternative D should also include Right of Way exclusion and No Ground Disturbance for this area. The BLM and CDOW should evaluate the success of the new seasonal prairie dog shooting closure and consider implementing a year-round closure in potential ferret reintroduction habitat to help bolster prairie dog populations to where ferret reintroduction could be feasible and to help further ferret recovery if ferrets are eventually released. Other white-tailed prairie dog ferret reintroduction areas like Shirley Basin and Coyote Basin (Utah) include year-round shooting closures in at least portions of the reintroduction area.	exploration pose a threat that needs to be addressed.
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	Greater Sage Grouse - As articulated in the Impacts from Oil and Gas on Wildlife and the Greater Sage Grouse portion of our comments, BLM has an opportunity to make decisions as part of this planning process which could greatly benefit the long-term survival of the Greater Sage Grouse. Unfortunately, BLM failed to consider designating (or even analyzing) the proposed Sage Grouse Conservation ACEC which was proposed as part of the appeal of BLM's decision to allow drilling on the Focus Ranch parcel. This is particularly unfortunate given that according to Clait Braun, a recognized expert on Sage Grouse (see comments submitted by Clait Braun on the Draft RMP), "Greater sage grouse habitat protection is particularly important in the Little Snake Resource Area, which contains the largest, healthiest lek complex in Colorado" (Braun, C.E. 2004. Declaration re: APD for Focus Ranch, Federal	BLM considered and analyzed the nominated ACEC for sage-grouse conservation. As noted in the Draft RMP/EIS Appendix G, "the area proposed meets relevance as a BLM Sensitive Species but does not meet any importance criteria because the area is not unique compared to other areas containing the nominated species. The nominated species are no more sensitive than other sage-grouse species in the LSFO." Since the area does not meet both the relevance and importance criteria, it was not included in an alternative in the Draft RMP/EIS as an ACEC.

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		#12-1) (Attached). Recommendations: BLM should designate the Greater Sage Grouse Conservation ACEC as proposed during the Focus Ranch APD Appeal to aid in the conservation of Greater Sage Grouse populations.	
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	Gibbens's penstemon - It is extremely difficult to understand why the BLM would not designate an ACEC to conserve Gibben's penstemon in the preferred alternative. This is one of the rarest plant species found on BLM lands in Colorado, and is ranked as a G1S1 species by the Natural Heritage Program - the highest level of imperilment. For the BLM to find that Irish Canyon warrants ACEC designation and an area like Spitzie Draw does not is arbitrary and capricious. Center for Native Ecosystems and Biodiversity Conservation Alliance have both considered petitioning for Endangered Species Act protection for Gibben's penstemon in the past. The Little Snake RMP revision is BLM's opportunity to show that it is serious about the conservation of this extremely rare wildflower. Recommendations The BLM should include ACEC designation for Gibbens's penstemon in every alternative and should be designated in the Proposed Plan. Both the Spitzie Draw and Sterling Place PCAs should be designated in their entirety. Management should follow that described in the Natural Systems section below.	The Draft RMP/EIS, chapter 2 (page 2-23) contains management for special status plant species that would protect them from permitted surface disturbing activities. As such, ACEC designation would not provide any additional protection, and is therefore not needed to protect and prevent irreparable damage to the relevant and important values associated with the Gibben's Beardtongue ACEC. Again, it is not the ACEC that provides protection, but management decisions. In this case, the management for all special status plant species would be sufficient to protect the Gibben's beardtongue.
Areas of Critical Environmental Concern	Wilderness Society (The), et. al.	BLM failed to consider management prescriptions for ACECs which will adequately protect the natural resources. We have already noted the many ways in which the BLM must incorporate additional PCAs in this suite of ACECs, and how proposed ACECs must be expanded to incorporate the full extent of BLM surface within the PCAs. In addition, the BLM must provide adequate management for these proposed ACECs as well as all designated ACECs in the Proposed Plan. The management prescriptions in this plan seem to be focused on merely avoiding the exact locations occupied by the irreplaceable values rather than defending entire ACECs so that those values are not compromised by indirect effects. ACECs are supposed to act as mini reserves to ensure that the ecological processes necessary to sustain rare elements are conserved while sources of degradation are kept at bay, but this is not how the BLM is operating. Instead, ACECs are seen as just another hoop to jump through before disturbance can be approved. The BLM may require slight changes	FLPMA defines ACECs as "areas within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards" (FLPMA Sec 103 (a)). Further, BLM's ACEC manual (BLM-M-1613) states that "to be designated an ACEC, an area must require special management attention to protect the important and relevant values" (Section .12). This direction does not prescribe the creation of "mini reserves," but the protection and prevention of irreparable damage to the relevant and important values, resources, systems, and processes. Boundary size and management prescriptions need to be specific and restrictive enough to fulfill that requirement only. The

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		in siting, but rarely disallows intrusion in the ACEC itself. This is counter to FLPMA, which charges the BLM with an affirmative duty to designate and protect ACECs - not just the individual plants that they contain. But the BLM routinely cites language in its RMPs allowing the agency to permit conflicting uses in ACECs as long as direct harm to the rare species can be avoided. This is exactly the kind of loophole that this RMP revision should be closing rather than opening. The management prescriptions outlined in the Draft RMP do not adequately protect the resources for which ACECs are designated in the alternatives. Even Alternative D attaches only a CSU rather than NSO to most of the ACECs, which will result in extensive fragmentation of habitat and presence of indirect effects of disturbance even if these areas are designated. Recommendations: Any ACECs proposed to conserve rare plants or plant communities must contain the following management components to truly be effective: • Inclusion of buffers in order to protect against indirect effects of disturbance (PCA boundaries should achieve this) • No Surface Occupancy stipulations throughout the entire ACEC, with no opportunity for modification, waiver, or exception • Right of Way exclusion protections • No Ground Disturbance protections, with the opportunities for exceptions should fencing/exclosures be needed to further plant conservation goals.	Draft RMP/EIS contains such prescriptions in chapter 2, and chapter 4 analyzes whether the designations and prescriptions fulfill the legal, regulatory, and policy requirements.
Cultural and Heritage Resources	Colorado Historical Society	The proposal to allow unrestricted OHV use in the south Sand Wash play area and "open" areas and subsequently address the inevitable adverse impacts significant cultural resources within a five year time frame (and notably dependent on the "constraints of available funds and staff') is not consistent with the October 2006 Addendum 1 to the Colorado Protocol Agreement between the State Director of the BLM and the Colorado State Historic Preservation Officer (SHPO) regarding the manner in which the BLM will meet its responsibilities under the National Historic Preservation Act (NHPA) and the National Programmatic Agreement among the BLM, the Advisory Council on Historic Preservation (Council), and the National Conference of State Historic Preservation Officers (NCSHPO). Addendum 1 to the State Protocol stipulates the manner of compliance with Section 106 of the NHPA for comprehensive travel and transportation management planning by the BLM in Colorado. The basic premise of the addendum is that upon identifying areas of	See General Comment Response #46

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		interest for travel purposes, phased identification of historic properties through cultural resource inventories of designated routes and areas will occur according to priority, and subsequently opened to public use only after consultation under Section 106 has been completed.	
Cultural and Heritage Resources	Colorado Historical Society	Of particular note in Addendum 1 to the Colorado Protocol Agreement: "Development of Planning Alternatives: Selection of specific route networks and imposition of other use limitations will avoid impacts on cultural resources where possible. In accordance with 43 CFR 8342, existing cultural resource information must be considered when choosing among the range of alternatives for the design of a planning area travel system, including the potential impacts on cultural resources when determining whether each of the routes or areas in a planning area should be designated as open, limited or closed" (Addendum 1, p.2). The south Sand Wash Basin contains numerous significant cultural resources and designation of this area as an OHV "play area" (and other areas as "open" for OHV use) does not realistically consider the drastic impacts of this decision on these fragile resources. It must be noted that severity of the impacts to such resources will be intensified due to focusing LSFO-wide OHV use into a specific locale(s).	None of the alternatives considered in the Draft RMP/EIS designate specific routes, and therefore analysis of impacts from such actions are not contained in this document. Subsequent transportation planning will consider such decisions and their impacts. BLM will follow the Amendment to the Colorado Protocol with SHPO, which agrees on the area of potential effect associated with transportation actions, including route designation. In relation to area designations, completion of the Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP and the corresponding sensitivity maps (Draft RMP/EIS maps 3-23 and 3-24) are direct methods and results of considering existing cultural resource information in creating and analyzing the alternatives. More specifically, chapter 4 includes analysis of the number of acres inventoried and known and potential sites within the areas open to cross-country OHV use. Based on these analyses, the Draft RMP/EIS considers the impacts of the areas open to OHV use based on the information available. The last sentence of the comment is based on the incorrect assumption that existing use reflects existing management. Such a statement assumes the amount of cross-country OHV use occurring throughout the entire RMPPA will not change, but merely be compressed into the remaining open areas. In reality, although the majority of the RMPPA is open to cross country use in Alternative A (No Action) most OHV use throughout the RMPPA is self-limited to existing roads and trails and not actively seeking specific cross-country OHV opportunities. As such, the change in Alternatives C and D from open to cross country OHV use to limiting OHVs to existing (until transportation planning occurs) or designated routes will not

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			concentrate OHV use, as the commenter contends.
Cultural and Heritage Resources	Colorado Historical Society	Of particular note in Addendum 1 to the Colorado Protocol Agreement: "Proposed designations of new routes or areas as open to travel are subject to Section 106 compliance in the same manner as any undertaking. Class III inventory in the APE (area of potential effect) is required prior to designation of new routes or areas as open to travel, and for new locations proposed as camping areas, staging areas or similar areas of concentrated travel" (emphasis in original, Addendum 1, p. 3). The proposal in the DEIS to designate certain areas including portions of the Sand Wash Basin as open to OHV travel before undergoing the transportation planning process and then subsequently completing Class III inventory, site evaluation, site mitigation and reporting within five years following the signing of the ROD is clearly contrary to the procedure that has been established in Addendum 1 (of the state protocol agreement).	See General Comment Response #46
Cultural and Heritage Resources	Colorado Historical Society	Of particular note in Addendum 1 to the Colorado Protocol Agreement: "Consultation with SHPO and affected tribes is required for all [transportation and travel management] planning efforts and, as necessary, with other consulting parties" (Addendum 1, p. 6). Such consultation, which solicits concerns relative to planning options and ensures that appropriate identification and treatment options are developed and implemented during or after the planning effort, is critical. The efforts made by the BLM regarding tribal consultation for this undertaking (as described on p. 3-77) do not meet the agency's responsibilities under the NHPA and the Protocol, nor has the consultation process been concluded. Authorization of activities which will adversely affect historic properties prior to the completion such consultation amounts to foreclosure.	BLM recognizes that consultation efforts with SHPO and affected tribes have not concluded. To the contrary, as the Proposed RMP was solidified, consultation moved from discussions of conceptual issues to consultation on actual proposed decisions. Since the Draft RMP/EIS has been published, BLM has offered in-person visits to the Tribal Business Council of the Southern Ute, Ute Mountain Ute, Eastern Shoshone, and the Uintah-Ouray Ute Tribe. The only response was from the Uintah-Ouray Ute Tribe, and the Field Office Manager presented the Draft RMP/EIS to them in a February 2007 Tribal Business Council meeting. In addition, the field office archaeologist has met face-to-face with Eastern Shoshone, Northern Ute, and Ute Mountain Ute representatives to discuss the Draft RMP/EIS. A summary of all consultation efforts with Native American Tribes has been updated in chapter 5 of the Proposed RMP/Final EIS. In addition, the field office archaeologist has also had several discussions with SHPO, including an on-the-ground visit to the South Sand Wash area to discuss SHPO concerns. BLM will finalize consultation efforts with both SHPO and affected tribes prior to signing the Record of Decision.
Cultural and Heritage	Colorado Historical	While some degree of management (although not specific to cultural resources) has been proposed for OHV use in the south Sand Wash	There are areas designated for “open” OHV use under Alternatives A, B, and C. However, under

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Resources	Society	"play area" under designation as a "special recreation management area" (SRMA), there is no similar guidance offered for the management of cultural resources in the other areas proposed in the various alternatives for "open" OHV use.	Alternatives A and B, the open designation is the default management given a lack of other resource protection measures. The Draft RMP/EIS acknowledges these alternatives would have significant impacts on cultural resources from such use. The Draft RMP/EIS chapter 2 does include management to mitigate potential adverse effects in open OHV areas (page 2-34). This is more easily accomplished under Alternative C, as only 19,710 acres would be open to OHV use (acreage reflects changes made to the South Sand Wash open area in the Proposed RMP/Final EIS). This range of alternative provides BLM management a wide degree of consideration for OHV management, as well as the impacts on cultural resources from each alternative.
Cultural and Heritage Resources	Colorado Historical Society	The maps defining the South Sand Wash SRMA (Maps 2-36 and 2-37) and the maps indicating areas open to OHV use (Maps 2-45 through 2-47) are too general to be useful in determining the area of potential effect of such designations.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. Map content was developed from BLM standard GIS datasets and presented on the maps with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The 8 1/2” by 11” format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review. However, commenters seeking more specific detail could have contacted the BLM Little Snake Field Office to obtain more detailed information. Such an avenue was encouraged in the Draft RMP/EIS Notice of Availability in the Federal Register.
Cultural and Heritage Resources	Colorado Historical Society	The figure cited on page 3-75 indicating that about 1.8 million acres of the 2.4 million acre Resource Management Plan Planning Area (RMPPA) (about 75 percent) has been "intensively inventoried" for cultural resources as of September 2005 is erroneous. Our records indicate that only around three percent of the RMPPA has been inventoried for cultural resources at a Class III level	The citation from McDonald and Metcalf refers to Table 1 from the Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP. This table contains data from “within the boundaries of the Little Snake Field Office,” not just BLM administered lands within that area. To correct this error, the Draft RMP/EIS reference to the RMPPA was replaced in the Proposed RMP/Final EIS with a reference to a more general “planning area,” which, as defined by BLM 1601-1 planning handbook,

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			"includes all lands regardless of jurisdiction." In addition, the cited source already includes a note cautioning the reader that the acreages of cultural resource inventories (Class II and III) may be inflated. In the end, the Class I Overview, and by extension, the Draft RMP/EIS, simply reports the acres of cultural resource projects contained in the OAHP database. The Proposed RMP/Final EIS retained the acreages as cited in the Class I report, with the intent that the note associated with Table 1 from the Class I Overview would be sufficient to inform the interested reader of the potential for inflated acreages.
Cultural and Heritage Resources	Colorado Historical Society	The statement that the BLM "will implement a proactive management program to carry out its responsibilities under Section 110 of the NHPA and the Colorado Protocol" is welcome, but the plan lacks specific measures to accomplish this goal.	The Executive Summary, where the language quoted was obtained, is not meant to provide specific measures, merely summarize the types of decisions contained in chapter 2 of the Proposed RMP/Final EIS. The proactive measures contained in chapter 2 include the identification of priority areas for cultural resource surveys, prioritization of "at risk" sites, and prioritization of sites for monitoring, nomination to the National Register, and for interpretation.
Cultural and Heritage Resources	Colorado Historical Society	"Site avoidance" as the "preferred mitigation treatment for adverse effects" (page ES-10) does not address adverse effects to cultural landscapes (for example, the vicinity of Thornburgh Mountain and cultural resources associated with the nearby Battle of Milk River).	The Proposed RMP/Final EIS has been revised in several locations to address this comment. A Controlled Surface Use (CSU) stipulation has been added to the viewshed of the Thornburgh/Battle of Milk Creek area. In addition, language in chapter 4 was revised to include the identification of potential impacts to cultural settings, including potential cumulative impacts to the setting of cultural resource sites.
Cultural and Heritage Resources	Colorado Historical Society	Adequate consultation with Native American tribes regarding the effect of the proposed RMP on known cultural resources and traditional cultural properties per the NHPA has not been demonstrated. This consultation must take place prior to any activity associated with the undertaking which has the potential to affect these resources (thus prior to designation of the south Sand Wash OHV play area and other "open" OHV areas upon signing of the ROD). Given the inevitable adverse effects of the proposed alternative on cultural resources, simply notifying tribes with potential interest does not suffice for adequate consultation.	BLM recognizes that consultation efforts with Native American tribes have not concluded. To the contrary, as the Proposed RMP was solidified in the Final EIS, consultation moved from discussions of conceptual issues to consultation on actual proposed decisions. Since the Draft RMP/EIS has been published, BLM has offered in-person visits to the Tribal Business Council of the Southern Ute, Ute Mountain Ute, Eastern Shoshone, and the Uintah-Ouray Ute Tribe. The only response was from the Uintah-Ouray Ute Tribe, and the Field Office Manager presented the

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			Draft RMP/EIS to them in a February 2007 Tribal Business Council meeting. In addition, the field office archaeologist has met face-to-face with Eastern Shoshone, Northern Ute, and Ute Mountain Ute representatives to discuss the Draft RMP/EIS. A summary of all consultation efforts with Native American Tribes has been updated in chapter 5 of the Proposed RMP/Final EIS. BLM will finalize consultation efforts with affected tribes prior to signing the Record of Decision.
Cultural and Heritage Resources	Colorado Historical Society	Because this undertaking is "non-routine" and has the potential to affect significant cultural resources, consultation with the Council may be warranted (Section VIII (C)(2)(a) of the Protocol).	BLM will comply with its Section 106 responsibilities as directed by the NHPA regulations and Addendum 1 to the Colorado Protocol.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Draft EIS also includes misleading and inconsistent statistical information that should be corrected. For example, Section 3.1.10.1 Current Conditions cites McDonald and Metcalf (2006), stating that as of September 2005, about 1.8 million acres had been inventoried. The LSRA contains only about 1.3 million acres, thereby creating a misperception that all of the resource area (and more) has been inventoried. The Draft EIS fails to indicate that some high development zones have been re-surveyed multiple times, accounting for the higher acreage surveyed when, in fact, only a very small percentage of the LSRA has been intensively inventoried, and only a small fraction of sites identified (see Draft EIS 4-104). Section 3.1.10.1 further states there are 5,622 sites where cultural resources have been identified. However, it also states there are 4,246 prehistoric sites, 1,217 historic sites and 154 sites with both historic and prehistoric components. Those numbers do not add up to the 5,622 sites indicated above. It is therefore recommended: - The EIS should state the intent of the BLM to develop a meaningful and statistically valid inventory (Class II or Class III block surveys) of representative lands within the LSRA whereby the diversity, distribution and density of cultural resources can be properly considered in future land management decisions. - Statistical inaccuracies related to the number of documented sites need to be corrected. - References throughout the document to numbers of affected sites in specific areas under various alternatives need to accurately reflect that these are "potential" numbers that were derived from an invalid sample, and that the actual number could be much higher.	The citation from McDonald and Metcalf refers to Table 1 from the Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP. This table contains data from “within the boundaries of the Little Snake Field Office,” not just BLM administered lands within that area. To correct this error, the Draft RMP/EIS reference to the RMPPA was replaced in the Proposed RMP/Final EIS with a reference to a more general “planning area,” which, as defined by BLM 1601-1 planning handbook, “includes all lands regardless of jurisdiction.” In addition, the cited source already includes a note cautioning the reader that the acreages of cultural resource inventories (Class II and III) may be inflated. In the end, the Class I Overview, and by extension, the Draft RMP/EIS, simply reports the acres of cultural resource projects contained in the Colorado Office of Archaeology and Historic Preservation (OAHP) database. The Proposed RMP/Final EIS retained the acreages as cited in the Class I report, with the intent that the note associated with Table 1 from the Class I Overview would be sufficient to inform the interested reader of the potential for inflated acreages. The Class I Overview does note that 5 cultural resource sites have not been encoded as either historic or prehistoric. The Proposed RMP/Final EIS was revised to note only the 5,617 cultural resource sites that have been encoded. In preparing the Draft RMP/EIS, BLM used

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		- Misleading data related to the acreage subjected to intensive inventory need to be clarified to reflect actual acres considered in these inventories.	the best available information to form the basis for the cultural resources analysis. This baseline data is the result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. In addition, a land use plan decision is not required to perform Section 110 inventories. BLM understands its Section 110 responsibilities and seeks to perform Section 110 inventories as staffing and budget allows. For the purposes of analysis, BLM included the analytical assumption that "although there is limited information on cultural resources in the RMPPA, prehistoric and historic current archaeological sensitivity models developed in conjunction with the Class I cultural resources inventory…depict the potential for cultural resource sites within the RMPPA" (Draft RMP/EIS page 4-103). Based on this assumption, there is no need to note that all estimated numbers of sites are "potential" numbers.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The BLM has applied the McDonald and Metcalf (2006) predictive model for cultural site sensitivity throughout the Draft EIS, while admitting that the sample of known sites used to create the model may be statistically invalid. The invalidity of the model is not ameliorated by the fact it was the only such model available to planners. The BLM cannot properly manage cultural resources it does not know exist, and hence the absence of a statistically valid sample militates against adequate consideration of potential impacts to unknown cultural resources. Instead, the model is little more than a de facto corroboration of the failure of the BLM over the past two decades to take seriously its Section 110 responsibilities to implement a proactive preservation program for the identification, evaluation and National Register nomination of historic properties under its jurisdiction or control.	See General Comment Response #39
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	It is acknowledged that all four of the identified tribal interests, all with a shared Numic linguistic heritage, indeed have historical ties to the region, and that archaeological evidence suggests these ties have existed for at least five to seven centuries (cf. Spangler 2002). It is emphasized that all four identified tribes should be involved in ongoing coordination and participation in the RMP process.	See General Comment Response #38

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		However, the list of tribes included in the Native American consultation process is clearly inadequate in that it is exclusive of other, non-Numic tribal interests with longstanding cultural and historical ties to the lands and cultural resources of the LSRA, and whose archaeological imprint in the region may have exceeded that of the ancestral Utes by many centuries or more. The exclusion of other Native American groups from the consultation process stands in decided contrast to the archaeological evidence that suggests that ancestral Plains groups, Puebloan groups and perhaps Athapaskan groups may also have deep cultural and historical ties to the region, and that these groups should also be afforded the opportunity to comment on the planning process.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Given the absence of scientific consensus, the identification of only four Native American groups, all with the same shared ethnic and linguistic heritage, does not adequately reflect the complex tapestry of cultural influences evident in the archaeological record of the region. Nor is it consistent with 36 CFR 800.2(C)(2) or guidance from the Advisory Council on Historic Preservation (www.achp.gov/regs-tribes) that state and federal agencies must "make a reasonable and good faith effort to identify Indian tribes that attach (religious or cultural) significance but may now live at great distances from the undertaking's area of potential effect." ACHP guidance further states that there may be multiple Indian tribes that attach significance to historic properties and that "the federal agency is obligated to consult with each of the Indian tribes."	See General Comment Response #38
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The limited scope of tribal consultation also appears to be inconsistent with Section 101(d)(6)(B) of the National Historic Preservation Act, which requires the agency official to consult with "any Indian tribe...that attaches religious or historical significance to historic properties that may be affected by an undertaking. This requirement applies regardless of the location of the historic property" (emphasis added; see also 36CFR 800.2(ii)). As further described in 36 CFR 800.2(ii)(A), "It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes...that shall be consulted in the Section' 106 process." Furthermore, 36 CFR 800.2(ii)(D) states that "federal agencies should be aware that frequently historic properties of religious and cultural significance are located on ancestral, aboriginal or ceded lands of Indian tribes...and should consider/that when complying with the procedures in this part" (emphasis added).	See General Comment Response #38
Cultural and Heritage	Colorado Plateau	The failure to identify all Indian tribes with cultural or religious interests in the region also contradicts the spirit and intent of	See General Comment Response #38

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Resources	Archaeological Alliance	Executive Order 13175 that seeks "regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications," and that tribal governments be granted "the maximum administrative discretion possible." It is clearly evident that the identification of only four tribes does not constitute a "reasonable and good faith effort" to identify Indian tribes that should have been consulted during the planning process.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Draft EIS (Section 5.1.1 Native American Consultation) indicates that the BLM initially sent an internal draft of the RMP/EIS to four tribes (Shoshone Tribal Council, Ute Mountain Tribal Council, Uintah and Ouray Tribal Council and Southern Ute Indian Tribe) in April 2004, and in October 2004 sent letters to tribal governments "requesting information for the RMP/EIS and inviting their coordination and participation in the RMP revision process." This was followed by a telephone call to the tribes in November 2006. The document states the BLM will engage in additional consultation with the tribes.	See General Comment Response #38
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	There is little documentation in the Draft EIS supporting the contention that the LSRA has engaged in robust consultation with Indian tribes to this point, or that the consultation letters inviting participation specifically identified cultural or religious properties of significance that would be relevant to the tribes' participation. As articulated in 2007 by the Interior Board of Land Appeals (IBLA 2004-124) in Southern Utah Wilderness Alliance v UT 055 et al., meaningful consultation with Indian tribes involves more than sending letters inviting their participation. In that case, SUWA argued that "brief conversations with, or form letters to, tribal councils or leaders regarding the potential effects of oil and gas leasing and development are insufficient to meet BLM's duty under NHPA to make a reasonable and good faith effort to seek information from Native American tribes" (citing Pueblo of Sandia v United States, 50 F.3d 856, 10th Circuit 1995). The IBLA ruled in favor of SUWA.	See General Comment Response #38
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Efforts by LSRA staff to consult with the identified tribes regarding the Draft EIS may have been adequate, although meaningful consultation efforts are not clearly articulated in the Draft EIS and there is no indication the BLM identified historic properties or sacred sites of significance to the tribes. The failure to involve a broader range of tribes (see discussion above) would also minimize BLM's claims of meaningful consultation. LSRA staff has indicated their intent to brief tribal leaders in the near future regarding the Draft EIS	See General Comment Response #38

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		to seek greater tribal participation. These briefings are certainly appropriate. However, the initiation of these briefings three years after initial planning documents were formulated seems inconsistent with the spirit of Executive Order 13175 requiring "timely input by tribal leaders," or with 36 CFR 800.2(ii)(A), that "Consultation should commence early in the planning process, in order to identify and discuss relevant preservation issues and resolve concerns about the confidentiality of information on historic properties." In light of these considerations it is recommended: § The LSRA immediately revise its consultation policies to include the broadest possible range of tribal interests, and that this range include, at a minimum, Puebloan, Plains, Athapaskan and Numic groups, as identified in Colorado Historical Society Document No. 1550. Particular efforts should be directed at consultation with the Hopi and Zuni tribes, which have historically claimed affiliation with Fremont peoples. § In accordance with IBLA Ruling 2004-124, meaningful consultation should include more than form letters and cursory phone calls to invite participation. If necessary, a final EIS should be delayed until meaningful and comprehensive consultation with all relevant tribes is initiated and tribal concerns are properly addressed in the RMP.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Generally, the Draft EIS defers to Section 106 of the National Historic Preservation Act when discussing management alternatives related to cultural resources in the LSRA. The Draft EIS repeatedly states its preference for site avoidance as the primary mitigation measure, where possible, with the inherent assumption that avoidance would eliminate adverse effects. Furthermore, Section 4.3.9 Impacts on Cultural and Heritage Resources states: "Through compliance with Section 106, there would be no significant impacts on cultural resources from federal undertakings such as oil and gas development, coal mine development, construction within ROWs, recreation site development, prescribed fire, vegetation treatment projects that require Class III inventories, wild horse gathers, forest and woodland product harvest, and special recreation permitting or construction of range improvements" (Draft EIS 4-104). Such statements are problematic on numerous points. The assumption on the part of the BLM that site avoidance results in no adverse effects, or insignificant effects, is inherently flawed and is at odds with 36 CFR 800. Avoidance of cultural sites evident on the ground surface may avoid direct damage to the surface evidence. However, there is a potential for damage to archaeological sites not clearly evident on the site surface, as well as adverse effects to sites	BLM's policy is to fully protect cultural resources. Protection is accomplished by considering direct, indirect, and cumulative effects and developing mitigation actions to address adverse effects. In general, BLM's preferred method of mitigation is site avoidance. Additionally, the APE for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP. The combination of avoiding sites and analyzing the agreed-upon APE will protect cultural sites to the extent possible while meeting BLM’s multiple use mission and complying with federal and state laws and regulations. The discussion of indirect and cumulative impacts on cultural resources has been expanded in the Proposed RMP/Final EIS.

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		outside the area of direct impact. Particularly relevant is 36 CFR 800.5(1) that states "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be give to all qualifying characteristics of a historic property..." (emphasis added; See also 65 Fed. Reg. 77698, 77720 (Dec. 12, 2000) discussing indirect effects). This section of the Federal Code clearly states that federal agencies shall consider the indirect effects of undertakings on eligible properties. It can also be concluded that re-routing or relocating ground-disturbing activities to avoid direct impacts to known historic properties visible on the surface may not avoid, minimize or mitigate the indirect effects of such undertakings.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Also problematic is the statement that compliance with Section 106 would result in no significant impacts from undertakings on BLM-administered lands.(Section 4.3.9 Impacts on Cultural and Heritage Resources states: "Through compliance with Section 106, there would be no significant impacts on cultural resources from federal undertakings such as oil and gas development, coal mine development, construction within ROWs, recreation site development, prescribed fire, vegetation treatment projects that require Class III inventories, wild horse gathers, forest and woodland product harvest, and special recreation permitting or construction of range improvements") This statement is naive, if not disingenuous, given the Draft EIS acknowledges that unknown sites could be damaged or destroyed through ground-disturbing activities and that it may not be possible to avoid some sites (Section 4.3.9 Impacts on Cultural. and Heritage Resources). Damage to such sites, whether or not mitigation occurs, is an adverse effect that must be fully considered within the context of Section 106 and 36 CFR 800. Likewise, data recovery is a destructive activity that constitutes an adverse effect that should be considered in the planning process (see King 2000a, 2000b). It is therefore recommended that: -Statements to the effect there would be no significant impacts to historic properties through Section 106 compliance should be deleted and replaced with a statement to the effect that "significant impacts, both direct and indirect, to cultural resources could occur through federal undertakings regardless of compliance with Section 106 provisions."	The language in the Draft RMP/EIS was modified to clarify the difference between significant impacts as defined by NEPA and an adverse impact as defined by the National Historic Preservation Act. In addition, the impact analysis was revised to include additional information on the potential for indirect adverse impacts and the potential for adverse impacts, as defined by the National Historic Preservation Act.

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		-The EIS should clearly acknowledge the indirect adverse effects of undertakings on historic properties, and it should articulate the agency's intent to avoid, minimize or mitigate those indirect effects through the Section 106 review process.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Draft EIS also fails to adequately acknowledge that cumulative impacts from large-scale energy development could adversely affect site setting and integrity, even if the historic property itself is avoided (see 36 CFR 800.5(a)(2)(v)). Section 4.6.3 of the Draft EIS (Cumulative Impacts Cultural and Heritage Resources) offers only a cursory discussion of such impacts, suggesting that Section 106 compliance would require cultural surveys and avoidance or mitigation of identified sites, which in turn would result in the identification of more cultural sites and more information about cultural resources. There is no discussion whatsoever as to the cumulative impacts of federal undertakings on the integrity and setting of historic properties (see also discussion below related to the Vermillion Basin). Similar concerns about cumulative impacts were raised in connection with natural gas development in Nine Mile Canyon, a National Register-eligible archaeological district in east-central Utah with world-renowned rock art. These concerns were largely dismissed by the Price Field Office, which imposed minimal conditions on leaseholders. The subsequent natural gas development has precipitated a dramatic increase in heavy truck traffic through Nine Mile Canyon that has since resulted in significant dust, traffic problems and conflicts with other user groups. The Utah SHPO now readily acknowledges that the cumulative effects of large-scale natural gas development has had adverse effects on eligible historic properties (Matt Seddon, personal communication 2006) and post hoc mitigation measures are now being negotiated. The failure of the LSRA Draft EIS to consider the potential cumulative impacts of such development in the Vermillion Basin creates a similar potential to adversely affect historic properties without adequate consideration of those effects prior to development. It is therefore recommended: § The EIS should clearly acknowledge and thoroughly consider the cumulative effects of large-scale undertakings on historic site setting and integrity, even if direct impacts to those sites are avoided or mitigated as now stated. § The direct and indirect impacts of increased vehicular traffic, access, road construction, air quality and diminishment of site	The Proposed RMP/Final EIS was revised to include the identification of potential impacts from dust along mineral development roads, as well as the potential impacts to cultural settings, including potential cumulative impacts to the setting of cultural resource sites. In addition, the environmental and topographic conditions in Nine Mile Canyon (narrow canyon with extensive rock art along canyon walls and large amounts of private land, and existing mineral leases and developments) are very different than the conditions in Vermillion Basin. The lack of any existing oil and gas leases in Vermillion Basin, coupled with the Draft RMP/EIS stipulation limiting disturbance from oil and gas development to 1% of the area (under Alternative C in the Draft RMP/EIS, but included in a revised Alternative B in the Proposed RMP/Final EIS), would provide some protection to the landscape of this area. The actual impact would vary based on site specific conditions that would be analyzed on a case-by-case basis during implementation. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1 % ceiling on surface disturbance.

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		setting and location should be clearly stated.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Statements in the Draft EIS to the effect there will be no significant adverse effects because sites will be avoided creates a potential wherein BLM managers could determine that no consultation would be needed under provisions of 36 CFR 800.3. There is no overt indication in the EIS that the LSRA intends to preclude public participation in the Section 106 process, nor is there any explicit assurance that officials intend to engage interested publics as consulting parties through the Section 106 process. Any attempt to avoid public participation through a finding of no adverse effect would undermine the pint and intent of Section 106 of the National Historic Preservation Act.	The public comment periods required by NEPA were also used as the opportunities for public input for Section 106 of the National Historic Preservation Act. As a federal undertaking, BLM has consulted and will continue to consult with the State Historic Preservation Officer and seek to obtain concurrence on the final RMP decisions.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Any BLM unwillingness to acknowledge adverse effects, whether direct or indirect, could through a narrow interpretation of 36 CRF 800.3(a)(1) result in a de facto finding of "no potential to cause effects" and thereby circumvent the federal agency's responsibility to "seek and consider the views of the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties," as defined in 36 CFR 800.2(d)(1). It is therefore recommended: - The EIS should clearly state the intent of the agency to comply with public participation provisions of Section 106 of the National Historic Preservation Act, in addition to provisions for public comment through NEPA. Such participation is at the heart of the National Historic Preservation Act.	Stating compliance with laws is not necessary in the EIS, nor is it a land use planning decision. The public comment periods required by NEPA were also used as the opportunities for public input for Section 106 of the National Historic Preservation Act. As a federal undertaking, BLM has consulted and will continue to consult with the State Historic Preservation Officer and seek to obtain concurrence on the final RMP decisions. In addition, BLM has consulted with tribal contacts, and would, upon approval, consult with additional consulting parties (36 CFR 800.2(c)iiF5).
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 4.3.9 Impacts on Cultural and Heritage Properties acknowledges that cultural resources can be negatively impacted through the course of non-regulated surface-disturbing activities such as cross-country OHV travel, wildfires, illegal collection of artifacts, vandalism and pedestrian impacts that are not typically considered through Section 106 reviews. These impacts are admittedly difficult to quantify given that the locations of most cultural sites are unknown and that alternatives considered in the Draft EIS do not identify specific areas for ground-disturbing activities (see Section 4.3.9 Impacts on Cultural and Heritage Resources). However, such adverse impacts to cultural resources are, in many instances, the indirect consequence of regulated surface-disturbing activities that are considered during the Section 106 review process. The failure of the BLM to adequately consider such indirect impacts of undertakings on National Register-eligible properties is an abrogation of its responsibilities under Section 106	BLM does consider the impacts. As the commenter notes, the impacts are included in chapter 4 of the Draft RMP/EIS. The analysis will be used as part of the consultation effort (though not the formal consultation analysis or conclusions). The commenter opens the comment by acknowledging these exact impacts, concurring with the difficulty in quantifying, then claiming the indirect impacts are not adequately considered or clearly articulated. It is also important to note that the impacts of non-regulated surface-disturbing activities are not always the indirect impacts of regulated activities. Including such a claim would overstate those potential impacts. As currently structured, the analysis is sufficient in that it identifies the impacts from wildfires, cross-country OHV use, vandalism, etc. In other sections of

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		and 36 CFR 800.5(1). It is therefore recommended: -The EIS should clearly articulate the indirect impacts of federal undertakings and should explicitly state the intent of the BLM to consider such indirect effects during the course of Section 106 reviews of regulated activities (e.g., transportation planning, new road construction for oil and gas development, prescribed burns, etc.).	chapter 4, impacts from permitted activities on these unregulated uses are also identified. Therefore, there is a connection within chapter 4 for the reader to follow.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 1.5.1 of draft EIS articulates six broad planning issues identified during the scoping process: Energy and Minerals, Special Management Areas, Transportation and Travel Management, Wildlife, Socioeconomic Values, and Lands and Realty. All issues identified are valid planning issues that should be addressed. However, the identification of these six issues and related sub-issues includes no mention whatsoever of cultural resources, either as a separate management issue or as a related management consideration. The omission of cultural resources (historic and archaeological) as an important management issue negates the importance of these resources to local residents and Native American groups with deep historical and cultural ties to the region. Furthermore, it belies the importance Congress placed on these resources. As stated in the preamble to the National Historic Preservation Act, "the spirit and direction of the Nation are founded upon and reflected in its historic heritage," that "the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans," and that "increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development" (16 U.S.C 470 Section 1).	As the commenter points out, the issues identified in Section 1.5.1 are the broad issues that were most raised during the scoping process. The absence of any issues, including cultural resources, in no way diminishes the legal responsibility toward or importance of the issue. The Scoping Report notes that 4.2% of all comments were related to cultural resource issues. Based on Figure 2 in the Scoping Report, seven other issues received more comments during the scoping process. While each issue and sub-issue could have been identified in chapter 1, including or excluding it does not negate its importance, just the level of public input during the public scoping period, which is exactly what public scoping is supposed to do, as defined by the CEQ NEPA regulations. This said, the language was revised in the Proposed RMP/Final EIS to include mentioning cultural resources as a sub-issue under Issue 3: Transportation and Travel Management.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 1.5.2 (Planning Criteria) of the draft includes a catalog of constraints, conditions and guidelines for conducting the BLM planning process. As with Section 1.5.1, there is no mention of cultural resources within any of the 22 stated planning criteria, although there is a caveat that additional planning criteria may be identified throughout the planning process. This omission further negates the importance of cultural heritage to local residents and to Native American groups with deep historical ties to the region.	Not every resource needs to have a criterion identified in order to acknowledge its importance. There are several other resources that do not have any specific criteria. There is no planning policy or regulation that requires that planning criteria be developed for each issue or resource. However, many of these types of issues and resources are addressed in the existing criteria. For example, cultural resources are specifically addressed in

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			FLPMA, which is noted in the first criteria. Criteria #14 notes that the RMP “will take into consideration the lifestyles and concerns of area residents.” Inasmuch as these concerns have included cultural resources, they have been included.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 1.6.6 (Cultural and Heritage Resources) articulates the various federal laws under which cultural resources are managed. It includes the statement related to Section 106 of the National Historic Preservation Act that "Agencies are also required to consult with the State Historic Preservation Office (SHPO) and sometimes with the Advisory Council on Historic Preservation." This section omits a critical condition that agencies are required to consult with tribal preservation officers or their designees, as per 36 CFR 800.2(c)(2).This omission greatly diminishes the recognition that "the federal government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes and court decisions," as stated in 36 CFR 800.2(c)(2)(ii)(B). It is therefore recommended: -Language found in the identified six planning issues in Section 1.5.1 should be modified to reflect the BLM's commitment to balancing competing values, including cultural resources. The last sentence of Issue 1 Energy and Minerals could be modified to read "Issues regarding where and how mineral resources could be developed within the context of balancing environmental and cultural resource values will be a major focus of this plan." The last sentence of paragraph one of Issue 2 Special Management Areas could be modified to read "Many of the proposed wilderness characteristic areas also have oil and gas potential, important cultural resources, and support other uses, which could affect how BLM determines appropriate management." The last sentence of paragraph two of Issue 3 Transportation and Travel Management could be changed to read "Use and proliferation of roads greatly contribute to impacts to environmental values, wildlife, cultural and paleontological resources, and other values, and contributes to user conflicts over those values." The first sentence of Issue 5 Socioeconomic Values could be modified to read "people value northwest Colorado for a variety of reasons - it is a source of livelihood, has scenic qualities and open spaces, is a place to recreate, and offers an abundance of historic and archaeological resources important to the cultural heritage of the region."	Cultural resources are an important issue for the Little Snake Field Office. However, Section 1.5.1 identifies the six issues identified through scoping as the major issues contributing to the revision of the RMP. This is addressed in chapter 1 of the Draft RMP/EIS in Section 1.3.2 (Need). Impacts to cultural resources are addressed in the Draft RMP/EIS chapter 4, Section 4.3.9.
Cultural and Heritage	Colorado Plateau	[Section 1.6.6 (Cultural and Heritage Resources) articulates the various federal laws under which cultural resources are managed. It	As noted in the Draft RMP/EIS page 1-8, the planning effort will be guided “…by input from the

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Resources	Archaeological Alliance	includes the statement related to Section 106 of the National Historic Preservation Act that "Agencies are also required to consult with the State Historic Preservation Office (SHPO) and sometimes with the Advisory Council on Historic Preservation." This section omits a critical condition that agencies are required to consult with tribal preservation officers or their designees, as per 36 CFR 800.2(c)(2).This omission greatly diminishes the recognition that "the federal government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes and court decisions," as stated in 36 CFR 800.2(c)(2)(ii)(B).] It is therefore recommended: -The planning criteria listed in Section 1.5.2 should be augmented to include the criterion: "The Little Snake RMP will take into consideration the prehistoric and historic heritage of the region, while recognizing these resources are of value to local and national interests."	public, and government and tribal agency consultation and coordination…" The Proposed RMP/Final EIS has been modified with the addition of the recommended criterion.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	[Section 1.6.6 (Cultural and Heritage Resources) articulates the various federal laws under which cultural resources are managed. It includes the statement related to Section 106 of the National Historic Preservation Act that "Agencies are also required to consult with the State Historic Preservation Office (SHPO) and sometimes with the Advisory Council on Historic Preservation." This section omits a critical condition that agencies are required to consult with tribal preservation officers or their designees, as per 36 CFR 800.2(c)(2).This omission greatly diminishes the recognition that "the federal government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes and court decisions," as stated in 36 CFR 800.2(c)(2)(ii)(B).] It is therefore recommended: -The third sentence of Paragraph 3 of Section 1.6.6 Cultural and Heritage Resources should be modified to read that "Agencies are also required to consult with the State Historic Preservation Office (SHPO), tribal governments and sometimes with the Advisory Council on Historic Preservation."	The Proposed RMP/Final EIS has been revised as recommended.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	[Section 1.6.6 (Cultural and Heritage Resources) articulates the various federal laws under which cultural resources are managed. It includes the statement related to Section 106 of the National Historic Preservation Act that "Agencies are also required to consult with the State Historic Preservation Office (SHPO) and sometimes with the Advisory Council on Historic Preservation." This section omits a critical condition that agencies are required to consult with tribal preservation officers or their designees, as per 36 CFR	Executive Order 13007 was included in the Draft RMP/EIS on page 1-14. In addition, the listing of every single applicable law, Executive Order, or policy is not necessary or prudent for this document. The language at the front of Section 1.6 has been revised in the Proposed RMP/Final EIS to note that these laws are for "certain major federal authorities." Other authorities are sure to apply, including

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		800.2(c)(2).This omission greatly diminishes the recognition that "the federal government has a unique legal relationship with Indian tribes set forth in the Constitution of the United States, treaties, statutes and court decisions," as stated in 36 CFR 800.2(c)(2)(ii)(B).] It is therefore recommended: -The list of applicable federal laws identified in Section 1.6.6 should be augmented to include Executive Order 13007 (Indian Sacred Sites) and executive Order 13175 (Consultation and Coordination with Indian Tribal Governments).	Executive Order 13175, but repeating it here will provide no additional legal veracity.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	CPAA concurs with the BLM that route or area closures are an appropriate management strategy to protect known and unknown cultural resources that may be adversely impacted by OHV travel. This strategy is consistent with recent research in Range Creek in eastern Utah that demonstrated that vandalism decreased in direct proportion to increased distance from controlled access points, augmenting the validity of road closures as an effective management tool for preservation of archaeological sites (Spangler, Arnold and Boomgarden 2006). CPAA also concurs with the BLM that a comprehensive monitoring program should be implemented to assess OHV impacts on cultural resources. However, the Draft EIS is equivocal as to whether the Class III inventory of the affected areas, site evaluations, site mitigations and formal reporting should be completed prior to allowing OHV travel in open OHV areas or along designated routes.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Draft EIS is also equivocal on whether or not Class III inventories and ongoing site monitoring would include areas of potential impact outside of the open OHV areas and designated corridors. Recent research in southeastern Utah has demonstrated that damage to archaeological sites by OHVs can be both direct (driving vehicles through archaeological deposits) and indirect (using OHVs to gain access to topographic locations where sites are located). Indirect impacts were considered to be more common in that archaeological sites were being impacted by pedestrians who used mechanized vehicles to arrive at site locations. Research also found that sites with the greatest evidence of adverse human impacts were those visible from an existing OHV route (Spangler 2006). Similar research in eastern Utah also demonstrated a direct relationship between vehicle access and frequency of vandalized sites. Sites visible from an existing route were more likely to have been vandalized, as were sites within 200 meters of an existing route (Spangler, Arnold and Boomgarden 2006).	None of the alternatives considered in the Draft RMP/EIS designate specific routes, and therefore analysis of impacts from such actions are not contained in this document. Subsequent transportation planning will consider such decisions and their impacts. BLM will follow the Amendment to the Colorado Protocol with SHPO, which agrees on the area of potential effect associated with transportation actions, including route designation.
Cultural and	Colorado	Improper OHV use constitutes perhaps the greatest single threat to	Page 2-32 of the Draft RMP/EIS notes that a goal of

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Heritage Resources	Plateau Archaeological Alliance	the long-term preservation of cultural resources in the LSRA and elsewhere in the West. There can be little dispute that OHVs have greatly enhanced the ability of the public to gain access to and enjoyment from cultural resources that have previously been protected by their isolation, lack of visibility or distance from an improved road. There is also little dispute that some individuals have utilized OHVs to facilitate damage to cultural resources, whether directly or indirectly. CPAA has been unable to identify any public outreach effort by the BLM in Colorado to educate OHV users as to the fragile and irreplaceable nature of cultural resources, or to promulgate proper etiquette among OHV users who visit these resources.	the RMP is to expand regional interpretation activities for cultural resources. This could include education outreach to public land users. In addition, page 2-79 notes that objectives for the recreation program include the use of “education as a means to further resource protection” and to “continue coordination with organized interpretive associations.” Existing public outreach and education, and programs such as “Leave-No-Trace” or “Tread Lightly” currently include this information, and they are updated continually as new information becomes available. Specifically identifying the commenter’s suggestions, beyond the general language already present in the Draft RMP/EIS, neither increases BLM’s ability to perform such outreach, nor precludes BLM from actively pursuing such outreach measures. According to BLM’s planning handbook (BLM-H-1601-1), this type of prioritization is not a land use plan decision, and is outside the scope of this NEPA document. Future education activities will be determined on an annual basis as funding and staffing are available.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The primary consideration in this discussion is that OHVs allow greater public access to archaeological sites, and that this access facilitates adverse effects. As discussed above, damage to or destruction of archaeological sites is most prevalent along existing routes, usually within 200 meters of an existing route (cf. Spangler, Arnold and Boomgarden 2006). Hence, the limitation of OHV travel to existing or designated routes may not significantly reduce impacts to cultural resources along those routes. Historically, that damage has not been well documented, and there has been little effort by the LSRA to identify sites along OHV routes that have been damaged or are vulnerable to damage. In effect, the BLM's Draft EIS acknowledges that damage is being done to cultural resources and that site integrity is diminishing, but it has no baseline data to evaluate the nature and extent of that damage.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	In terms of the protection of cultural resources, the restriction of OHVs to existing or designated routes is preferable to unrestricted cross-country travel. As discussed in Section 4.3.9.1, limiting OHV use to existing or designated routes must undergo site-specific transportation planning, which would include Section 106 review. The draft also states that "if this process does not occur, limiting	See General Comment Response #46

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		OHV use to existing or designated routes could still result in significant impacts caused by use of routes that contain or are adjacent to cultural resource sites." Given that caveat, it is imperative that Section 106 compliance be initiated as a component regardless of which alternative chosen. In short, the BLM cannot manage for and properly protect resources that the agency does not know are there.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Alternative C calls for a comprehensive Class III survey of the area, as well as mitigation and data recovery. Such measures are certainly appropriate, but it should also be noted that the nature of hunting and gathering camps is such that subsurface deposits may not be identified until after the ground surface has been altered, either through natural erosion or human factors. Hence, vehicular traffic may subsequently expose cultural materials that were not visible at the time the Class III inventory was conducted, enhancing the need for ongoing monitoring and future data recovery. This will require a significant ongoing commitment of limited BLM resources. Furthermore, data recovery is an adverse effect that must be properly considered through the Section 106 process (cf. King 2000a, 2000b).	The Draft RMP/EIS includes language for Alternatives B and C in relation to mitigation of potential adverse effects to historic properties in open OHV areas. Specifically, the Draft RMP/EIS notes that "a monitoring program would be established to assess OHV impacts on cultural resources. On the basis of the results of monitoring, BLM would take any actions necessary to fulfill its obligations under existing law to protect cultural resources. This may include changing certain aspects of management of the area, such as allowable use, or implementing mitigation measures, such as fencing or closing areas." Concerning data recovery being considered an adverse effect, text in chapter 4 has been revised in the Proposed RMP/Final EIS to note this.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The designation of such a large OHV "open play area" is problematic in that Alternative C acknowledges that significant cultural resources would be damaged or destroyed. Under Alternative C, open OHV use in the Sand Wash Basin appears to have been afforded preference over other irreplaceable values, including cultural resources. This approach appears to be at odds with BLM management of open OHV areas elsewhere. For example, at Little Sahara Recreation Area, a nationally recognized OHV play area in central Utah, open travel is allowed only in those areas where there are no competing values. Consequently, large areas of the recreation area have been placed off-limits to vehicle travel to protect sensitive plant species and natural values (see www.ut.blm.gov and www.utah.com/playgrounds). A similar approach to the protection of cultural resource values would be appropriate at Sand Wash Basin.	The recommended approach for Sand Wash Basin (to limit OHV use in areas with any competing values) was applied under Alternative D, which would limit OHV use in the South Sand Wash area to designated roads and trails. The impacts of this were identified in the Draft RMP/EIS.
Cultural and Heritage Resources	Colorado Plateau Archaeological	The closure of areas to open OHV travel due to archaeological site sensitivity is appropriately acknowledged in Alternative C as a possible strategy to protect cultural resources. But as stated in Section 4.3.9.3, it would nonetheless result in significant damage to	The Draft RMP/EIS Section 4.3.9.3 states that damage to cultural resources would be significant "...if transportation planning and the associated Section 106 process did not occur in the South Sand

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	Alliance	cultural resources. Section 2.5.9.2 indicates eligible properties could be protected through mitigation of adverse effects, including site avoidance where possible. These two statements appear to be somewhat inconsistent, e.g. the Draft EIS states that damage will be significant and that adverse effects can be mitigated through avoidance. CPAA concurs with the BLM that the only mitigation strategy that can properly protect cultural resources is a prohibition of open OHV travel in all areas where eligible properties are located. Consequently, it is also a de facto recognition that Alternative D (no open OHV travel) is the appropriate mitigation to ensure the protection of eligible properties in areas of archaeological site sensitivity, such as Sand Wash Basin.	Wash SRMA..." BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, BLM IM-2007-030, and Addendum 1 to the Colorado Protocol. As described in BLM IM-2007-030, cultural resource inventory requirements, priorities and strategies will vary depending on the effect and nature of the proposed OHV activity and the expected density and nature of historic properties based on existing inventory information. Additionally, language in Addendum 1 to the Colorado Protocol identifies inventory requirements, defines the area of potential effect (APE), outlines compliance with Section 106 when considering comprehensive travel and transportation management planning, and addresses monitoring requirements. Compliance with these directions during formal consultation with SHPO and during future route designations will negate the impact noted in Section 4.3.9.3, as was the intent of that stated impact.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The BLM acknowledges that the Sand Wash Basin area has a high potential to contain a significant number of sites eligible for listing on the National Register, and that these sites include a rare Ancestral Ute wickiup site. CPAA concurs in this assessment, but adds that camps in this area are also likely yield considerable information about hunting and gathering during all periods of prehistory. The mitigation of adverse effects to known and unknown eligible properties can only be accomplished through site avoidance, in effect a closure to open OHV travel that is articulated in Alternative D. If the BLM proceeds with its preferred Alternative C, those areas within the Sand Wash Basin demonstrated through future Class III surveys to have eligible properties should be closed to open OHV travel. The application of any mitigation strategy that does not include site avoidance (e.g., data recovery) must be acknowledged as an adverse effect that must also be considered within the Section 106 review process.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	It is emphasized that the BLM elsewhere has developed detailed plans to accommodate OHV use in archaeologically sensitive areas. For example the Tangled Lakes Archaeological District (TLAD), a BLM-managed National Register district in Alaska, encompasses 185,321 acres and more than 600 archaeological sites. Since the 1980s, the Glennallen Field Office designated OHV routes with the	Subsequent planning, including comprehensive transportation planning, for the South Sand Wash SRMA and OHV open area could address management strategies to mitigate site-specific issues with cultural resource sites identified through the cultural resource inventories in this area.

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		express purpose of protecting the high density of archaeological sites. A subsequent travel plan calls for seasonal restrictions on designated trail use, prohibits off-trail travel for game retrieval with some exceptions, imposes weight restrictions on vehicles, expands efforts to provide educational materials to trail users about the archaeological significance of the region, provides suggestions for best trail-use practices, provides for a heightened law enforcement presence during high-use periods, and calls for expanded monitoring of trails. The plan also defined the area of impact due to motorized use to be one-half mile on either side of a designated trail (BLM 2006). The TLAD three-part management approach clearly acknowledges the potential conflicts between OHV users and the protection of archaeological resources listed on the National Register. First, OHV travel was restricted to those routes where impacts to resources would be minimized and archaeological sites avoided. Second, these restrictions are being augmented with proactive efforts to educate trail users about the sensitivity and significance of archaeological resources, as well rules, regulations and best practices intended to protect those resources. And third, the plan calls for enhanced law enforcement and monitoring of potential impacts. The TLAD approach could be an appropriate strategy for the management of OHVs in archaeological sensitive areas within the LSRA.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: OHV travel be restricted to designated route, and that the designation of OHV routes include full Section 106 reviews of direct and indirect adverse effects, including enhanced access to vulnerable sites that could be vandalized or otherwise damaged.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: -The Class III inventory and site evaluations along existing or designated routes should be expanded to include areas of indirect impacts, with specific focus on identifying cultural resources in adjacent topographic settings that could be impacted by increased vehicular access. This should include, but not be limited to, the identification of rockshelters with potentially intact cultural deposits that are visible from a designated route regardless of distance, and to all other localities within 200 meters of an existing route.	None of the alternatives considered in the Draft RMP/EIS designate specific routes, and therefore analysis of impacts from such actions are not contained in this document. Subsequent transportation planning will consider such decisions and their impacts. BLM will follow the Amendment to the Colorado Protocol with SHPO, which agrees on the area of potential effect associated with transportation actions, including route designation.
Cultural and	Colorado	As these recommendations relate to OHV travel in open areas and	The identification of specific monitoring methodology

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Heritage Resources	Plateau Archaeological Alliance	on designated routes, it is recommended that: -Historically, site monitoring has consisted of on-site inspections with minimal field notes and substantial institutional memory as to what the original site condition was. It is therefore recommended that the LSRA site monitoring include a uniform database whereby impacts to cultural resources can be accurately and consistently measured, and site conditions compared and contrasted over time.	and data storage strategies are not RMP-level decisions as identified in BLM's planning handbook (BLM-H-1601-1), but are implementation-level. Therefore, specific monitoring strategies, methodologies, or collection/maintenance issues will be addressed subsequent to finalization of this RMP.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: -Given that budget constraints will greatly impede the progress of any Class III inventories related to OHV travel routes, ongoing monitoring and data recovery, as specified under Alternatives B and C, it is recommended that OHV users contribute to the cost of Section 106 compliance, perhaps through the designation, with Colorado Resource Advisory Council approval, of special fee areas or the use of other tax revenues earmarked for OHV recreation.	Requiring or setting fees for public land users or earmarking tax revenues is not an RMP-level decision, and is therefore out of scope for consideration in this document.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: -Any transportation plan should include public outreach efforts to educate OHV users about the fragile nature of cultural resources, the laws protecting those resources, proper etiquette expected of OHV users in archaeologically sensitive areas, and proper procedures to follow when encountering cultural resources or when observing improper or illegal behavior.	Page 2-32 of the Draft RMP/EIS notes that a goal of the RMP is to expand regional interpretation activities for cultural resources. This could include education outreach to public land users. In addition, page 2-79 notes that objectives for the recreation program include the use of "education as a means to further resource protection" and to "continue coordination with organized interpretive associations." Existing public outreach and education, and programs such as "Leave-No-Trace" or "Tread Lightly" currently include this information, and they are updated continually as new information becomes available. Specifically identifying the commenter's suggestions, beyond the general language already present in the Draft RMP/EIS, neither increases BLM's ability to perform such outreach, nor precludes BLM from actively pursuing such outreach measures. According to BLM's planning handbook (BLM-H-1601-1), this type of prioritization is not a land use plan decision, and is outside the scope of this NEPA document. Future education activities will be determined on an annual basis as funding and staffing are available.
Cultural and Heritage	Colorado Plateau	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that:	Alternative D considers limiting OHV use in the entire South Sand Wash area to designated routes.

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Resources	Archaeological Alliance	- Route or area closures are an appropriate and proven management tool to mitigate the adverse impacts of OHVs on and around archaeological sites. As demonstrated in Range Creek in eastern Utah, these closures are most effective when accompanied by an administrative commitment to maintain a visible law enforcement presence (Spangler, Arnold and Boomgarden 2006).	Establishing levels of administrative commitment through a visible law enforcement presence is not an RMP-level issue and is outside the scope of this EIS.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: -The EIS should clearly state that Class III inventories, site assessments and site mitigations will be completed prior to the designation of OHV routes or open OHV areas, and that cultural resource protection will be a fundamental goal of any transportation planning.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	As these recommendations relate to OHV travel in open areas and on designated routes, it is recommended that: - If the BLM determines that areas of high archaeological site sensitivity should be closed to OHV travel, as described in Alternative C, planning efforts should ensure that such designations do not overtly direct vandals and artifact collectors to vulnerable archaeological sites.	See General Comment Response #46
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The potential adverse effects of livestock grazing on cultural resources has historically been understated in BLM planning documents, due in large part to the paucity of data directly related to such impacts. It is generally accepted that in water-stressed environments, like the LSRA, livestock will congregate in those areas with a predictable and consistent source of water. In the absence of artificial water delivery systems, livestock will have the greatest impact on or around natural water sources, such as streams, springs, seeps and rivers. Archaeological research throughout the and West has repeatedly demonstrated that prehistoric humans were also tethered to predictable water sources to a greater or lesser degree (see Spangler 2001, 2002 for overviews of the regional data on this issue). It can therefore be postulated that those water sources conducive to livestock needs are the same water sources utilized by prehistoric populations, and that copious evidence of human activities through all periods of time will be located in direct proximity to areas disturbed by modem livestock activities. Consequently, livestock activities have a much greater potential to adversely affect historic properties than most other ground-disturbing activities. The Draft EIS indicates that impacts could be significant, but would be mitigated on a case-by-case basis in most instances (Draft EIS 4-	The RMP is not the document to determine whether a given action is subject to Section 106 compliance. BLM reviews all permitted actions for their potential to impact cultural resources, including term grazing permits. The BLM range and cultural resource programs coordinate on livestock grazing actions to identify and mitigate any impacts to cultural resources from livestock grazing at the implementation level. The Draft RMP/EIS does identify, at the landscape-level commensurate to the level of decisions proposed, that impacts to cultural resources could occur due to livestock grazing. During more specific planning/permitting activities any of these potential impacts would be further identified and mitigated, per BLM policy. The identification of specific monitoring methodology and data storage strategies are not RMP-level decisions as identified in BLM's planning handbook (BLM-H-1601-1), but are implementation-level. Therefore, specific monitoring strategies, methodologies, or collection/maintenance issues will

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		104). Although Section 4.3.9 of the Draft EIS acknowledges the difficulty in applying Section 106 to dispersed livestock operations, Section 2.6.2 fails to acknowledge any Section 106 obligations whatsoever, either through its stated goals or its proposed management actions. Furthermore, Section 3.2.2.2 states that BLM's traditional goal of managing livestock grazing to provide for sustainable habitat for livestock and other animals, but it makes no mention of management of livestock to preserve other values that may be impacted by livestock grazing. Section 2.6.2 does contain the caveat that "public land found to contain resource values that cannot be adequately protected from livestock impacts through mitigating measures would not be allocated to livestock grazing," although this statement is particularly vague. The Draft EIS appears to suggest an ad hoc management response to addressing livestock damage to cultural resources rather than full Section 106 considerations to avoid, minimize or mitigate prior to such impacts. Given that most cultural resources remain unknown and undocumented, the impacts from dispersed livestock activities on those sites remains unknown and undocumented. And given the broad spatial range of livestock grazing, it would be extremely difficult, if not impossible, for the BLM to monitor impacts to archaeological sites. This creates a scenario where the BLM knows that significant impacts are occurring, but they do not know the nature, extent or location of those impacts. And that would limit mitigation of impacts to the extremely small number of impacted sites that may be identified during the course of other routine management activities. This "accidental management" approach to mitigation of livestock impacts may be inevitable, but it is also an abrogation of the agency's Section 106 responsibilities. It is therefore recommended that: - The EIS should clearly state that livestock grazing leases are subject to Section 106 review, and that the BLM will thoroughly comply with its Section 6 responsibilities in that regard. -The EIS should articulate the intent of the BLM to identify impacts from livestock grazing prior to the occurrence of those impacts, and the measures that may be appropriate for avoiding, minimizing or mitigating such impacts. -The EIS should indicate that the BLM will monitor the impacts of livestock on cultural resources, and that baseline data will be collected whereby future management decisions can be based on documented evidence.	be addressed subsequent to finalization of this RMP.
Cultural and	Colorado	In the case of prescribed burns, Section 106 compliance measures	It is BLM policy to include resource advisors on

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Heritage Resources	Plateau Archaeological Alliance	would be in effect to ensure that no eligible properties would be adversely affected. However, given the stated management intent of prescribed fires (removing undesirable or excessive overgrowth to improve vegetative habitat) there is a high probability that historic properties will be obscured by vegetation and will not be identified during inventories. These resources could be significantly impacted by fire (see discussion in Section 4.3.9 Impacts on Cultural and Heritage Resources). The emergency nature of wildland fire response militates against comprehensive planning to protect historic properties. And it is probably beyond the scope of the RMP to suggest guidance for the protection of cultural resources in such events. However, it is recommended that: -General planning principles be implemented within the LSRA to ensure that wildfire responders are aware of the location and nature of potentially impacted cultural resources, and that qualified field specialists assist responders to facilitate the protection of known historic properties.	wildfires and suppression efforts to provide resource-specific expertise to protect potentially sensitive sites and values. This would include cultural resource specialists.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Because wildland fires have the potential to remove dense overgrowth, they also create opportunities to identify archaeological sites in areas where they are now obscured by vegetation. There is typically a narrow window of opportunity after such fires when the ground surface is not obscured by vegetation. It therefore recommended that BLM articulate a planning strategy to initiate inventories of burned areas to (1) identify previously unknown properties that may be eligible for the National Register of Historic Places, (2) identify potentially eligible properties that could be further damaged through accelerated erosion, and (3) conduct data recovery and/or mitigation at sites that were inadvertently damaged through fire suppression activities.	The Draft RMP/EIS does identify the impact noted by the commenter, specifically that reduction of vegetation by wildfire increases visibility of cultural resources. However, identifying a specific strategy in the RMP to conduct inventories of burned areas during the window of opportunity before vegetation obscures the sites again would require the associated allocation of funds to perform the inventory. The RMP is not the place to allocate funding, therefore such a strategy is outside the scope of this EIS. However, the Draft RMP/EIS does note that a reasonable amount of cultural resource inventories would be completed annually, within the constraints of available funds and staff. Such a strategy of inventories following wildland fire events would readily fit within this framework and could be considered during implementation of the RMP.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 106 compliance is usually associated with planning activities prior to the initiation of an undertaking such as a prescribed burn. Given the unique nature of fire and the potential for damage to cultural and heritage properties after the undertaking (e.g., erosion resulting from removal of overgrowth), planning documents should clearly articulate management policies for identifying cultural resources and avoiding, minimizing and mitigating damage to those resources after the prescribed fire. These could include secondary cultural resource inventories to be required immediately upon	BLM's policy is to fully protect cultural resources. Protection is accomplished largely through avoiding disturbing sites, which is BLM's preferred method of mitigation. Therefore, the suggestion of a policy to identify cultural resources and avoiding and minimizing and mitigating damage to those resources is already within BLM’s policy framework. Specifically articulating this strategy is not necessary for implementation.

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		completion of the prescribed fire.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Fire management plans should explicitly state the importance of cultural resources and should not simply defer to the agency's Section 106 responsibilities.	The content of fire management plan language is not an RMP-level decision and is therefore outside the scope of this EIS.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	CPAA concurs with the Draft EIS in Alternatives B, C and D that all lands currently designated as WSAs should be managed in compliance with the BLM's Wilderness Management Policy and terms of the Wilderness Act of 1964, that no additional road construction be allowed and that OHV use be limited to existing routes. It is also recommended that the EIS clearly state the BLM's intent to identify and monitor cultural resources within WSAs that are vulnerable to impacts from illegal OHV use and vandalism.	A land use plan decision is not required to perform Section 110 inventories or monitoring of vulnerable cultural resource sites. BLM understands its Section 110 responsibilities and seeks to perform Section 110 inventories and monitoring as staffing and budget allows.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Yampa River corridor was the focus of intense occupations through human prehistory, and as such contains an abundance of archaeological sites, although most remain undocumented. The management of the river corridor has primarily focused on recreational qualities, with little consideration expressed in planning documents for the impacts of those activities on cultural resources that may be located in proximity to areas of intense recreational use. As documented recently throughout the Desolation Canyon National Historic Landmark, those who use rivers for recreational purposes generally have great respect for cultural resources, and those resources have not suffered seriously from malicious acts in recent times. Most resource degradation consisted of inadvertent damage to the resources (e.g., trails through potential midden areas, leaning on ruin walls, stacking of artifacts into piles). The cumulative effect of such visitation was significant, but manageable through aggressive BLM planning (Spangler et al. 2007). Any plan to manage recreational use of the Yampa River, either as Wild and Scenic or though some other designation, should include a cultural resource management plan that includes (1) identification and documentation of cultural resources that may be impacted by recreational activities, (2) the development of public outreach efforts that promulgate proper etiquette on and around cultural resources, (3) the identification of management strategies to protect cultural resources (e.g., areas where camping is prohibited such as rockshelters and alcoves), and (4) the development of a site monitoring plan to assess the cumulative impacts of recreation visitors on the cultural resources.	The purpose of this RMP is to determine the suitability of eligible wild and scenic river segments, and to develop management to protect the free-flowing nature of those segments, the tentative classification (wild, scenic, or recreational), and the identified outstandingly remarkable values. Subsequent planning documents to address use within the suitable segments or any corresponding SRMAs (in the case of the Little Yampa River) are outside the scope of this EIS. The RMP does include a management goal to “seek to reduce threats and to resolve potential conflicts from either natural or human-caused deterioration.” Any development of subsequent plans would need to adhere to these objectives, which would provide protection and the addressing of the issues the commenter raises.
Cultural and	Colorado	The opening of the Vermillion Basin to oil and gas development, as	Draft RMP/EIS maps 3-23 and 3-24 show large

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Heritage Resources	Plateau Archaeological Alliance	described in Alternatives A, B and C, poses significant risks to the integrity of hundreds of archaeological sites that are potentially eligible for listing on the National Register. Alternatives B and C state that development would occur within management constructs that protect natural values (Draft EIS 2-47), although there is no acknowledgment that this region has a high density of significant archaeological sites, including a robust Fremont culture presence that resulted in spectacular rock art sites and storage locales. The aesthetic qualities of these archaeological sites continue to draw significant numbers of visitors to the Vermillion Basin.	portions of Vermillion Basin as having high sensitivity for prehistoric and historic cultural resource sites. Oil and gas development within these areas would result in the impacts noted in the Draft RMP/EIS, page 4-104, and modified in the Proposed RMP/Final EIS. Additionally, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The documented sites in the area are evidence of a movement of peoples and ideas from north to south, south to north, and along tributaries of the Green River throughout various periods of time. Hence, sites in the Vermillion Basin are interrelated to sites on Cold Springs Mountain, Browns Park and Irish Canyon. This relationship supports the designation of a more regional National Register district that includes significant sites in all of those areas. A model for this kind of district is the nearby Canyon Pintado National Historic District in Rio Blanco County, Colorado. This BLM-administered district has operated successfully since the oil-gas boom times of the 1980s and insures large-block (rather than piecemeal) protection and interpretation of archaeological resources in tributaries of the White River.	In keeping with the National Programmatic Agreement and the Colorado Protocol Agreement, BLM invites SHPO, public, governmental, and Native American participation in all planning efforts. According to BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places, whether as an individual site or as a district, is not a land use planning decision and is therefore outside the scope of this EIS. In addition, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The limitation of surface disturbance to no more than 1 percent of the Vermillion Basin is problematic in that development could be aggregated rather than dispersed, and that such development could result in concentrated cumulative effects that could "diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" (36 CFR 800.5). Consequently, adverse effects from such development, which should be considered in Section 106 reviews, must include the indirect and cumulative effects of increased road construction (increased vandalism and damage resulting from OHV use), increased vehicular traffic (air quality) and the integrity of the location where eligible properties are found (viewshed). The Draft EIS fails to even consider that such	The Proposed RMP/Final EIS has been revised to include analysis of impacts from oil and gas development to the cultural resource setting, as well as impacts from dust along routes. Impacts from vandalism and pot-hunting are already addressed in the Draft RMP/EIS (page 4-105). It is also important to note that the 1% stipulation does not negate BLM's compliance with other cultural resource laws, regulations, and policies. It would remain BLM's policy is to fully protect cultural resources. Protection would be accomplished largely through avoiding disturbing sites, which is BLM's preferred method of

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		activities could have a cumulative effect (see discussion above regarding cumulative effects). The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -Despite limiting the surface disturbance to no more than 1 percent of the Vermillion Basin as a whole, exploration and development activities in the region will allow for aggregated development in those areas of high potential, while other areas of low potential are reserved as undisturbed "credits" as part of the overall leasing unit. This creates a significant potential for cumulative effects that must be properly addressed in the EIS and through Section 106 reviews.	mitigation, even in areas of potentially concentrated development. Additionally, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -Energy development would mandate the construction of access roads subject to Section 106 compliance. These access roads could also facilitate public access to and degradation of cultural resources in the area. Consequently, any access routes constructed in connection with energy exploration and development should be designated as administrative routes and not public rights-of-way. These routes should be gated and locked, and OHVs should be limited to designated routes that have undergone Section 106 review.	Long-term management of individual routes constructed to support oil and gas development would be determined on a case-by-case basis and will take into consideration the site-specific issues associated with each particular route. Appendix F of the Draft RMP/EIS, and modified in the Proposed RMP/Final EIS, outlines the process for future transportation planning decisions. Additionally, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -Investigations of archaeological site vandalism and site degradation in eastern Utah have demonstrated that vandalism to cultural resources in the Jack Canyon area resulted from employees of oil and gas companies (BLM 2005). Anecdotal evidence of oil and gas employees engaging in vandalism (and other illegal activities) are common throughout the BLM, but are poorly documented. It is therefore recommended that each POD include stipulations that leaseholders, prior to initiating development, have in place BLM-approved personnel policies regarding employees who engage in illegal or inappropriate behavior, including acts that diminish the integrity of historic properties.	The Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C. Under Alternative B, PODs would be developed based on site-specific issues and would vary on a case-by-case basis, as conditions and issues vary. BLM currently requires leaseholders to inform their employees of a “discovery stipulation” that all discovered cultural resources be protected and

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			brought to the attention of BLM.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -The cultural resource inventory plan specified in the POD components should include a public outreach component, to be determined by the BLM and/or SHPO, whereby archaeological data collected during the course of Section 106 compliance activities can be reported to the public. Such requirements have been required by the Nevada SHPO for many years, and similar requirements are now being implemented on a case-by-case basis by the Utah SHPO. These efforts foster a greater public appreciation for cultural resources, while demonstrating appropriate accountability to the public for actions affecting historic properties.	The language for each POD, including public outreach components and reporting of cultural resource data to the public is best determined on a case-by-case basis following a review of the sensitivity of the cultural resource data and public accessibility of the site, as well as other site-specific issues. As such, requiring such a component in every POD would not be in the best interest of the cultural resource sites without further consideration at the implementation level. In addition, not including such a requirement in the RMP would not preclude such action during implementation, if site-specific conditions and consultation with Colorado SHPO determine such a course of action is appropriate.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -Given the importance of the Vermillion Basin to an understanding of Fremont culture interactions with ancestral Plains peoples, the entire Vermillion Basin should be subjected to an intensive Class III survey to determine the nature and extent of Fremont adaptations, and to assist the BLM in its efforts to mitigate direct and indirect adverse effects to these resources. This survey should be completed prior to lease development.	Class III surveys will be completed prior to any surface disturbing activities associated with development. These inventories, and any associated Section 106 consultations, will be completed at the application for permit to drill (APD) stage.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -Archaeological resources in the Vermillion Basin are well known to the general public, and they remain the subject of considerable public interest and recreational visitation. Any development of Vermillion Basin oil and gas leases should take into account the extreme sensitivity of these resources, including the aesthetic qualities that draw people to visit these cultural resources. In light of the fact that the area of potential effect is far greater than the 1 percent total surface disturbance, these considerations should include analyses of traffic patterns and potential conflicts with other users, deposition of road dust and chemical particulates on rock art panels, diminished quality of the viewshed and the cumulative impacts of the undertakings on the integrity of the property's location, design, setting, materials, workmanship, feeling or association (see 36 CFR 800.5(a)(1)). Furthermore, 36 CFR 800(2)(v) states the "introduction of visual, atmospheric or audible elements hat diminish the integrity of the property's significant	The Draft RMP/EIS has been revised to include potential impacts to the cultural landscape from mineral development. Further analysis of traffic patterns and dust generation and abatement would be addressed through NEPA analysis and the Section 106 process completed at the implementation level. In addition, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.

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		historic features" is an effect that must to taken into consideration.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: - A National Register nomination for rock art sites in the Vermillion Basin was initiated several years ago but was not finalized (Sally Cole, personal communication 2007). The nomination of the Vermillion Basin as a National Register archaeological district should be completed by the BLM and formally submitted to the National Park Service. Given the relationship of sites in the Vermillion Basin to those in Irish Canyon, Cold Springs Mountain and Brown's Park, the BLM should consider an archaeological district that includes nearby archaeological sites.	In keeping with the National Programmatic Agreement and the Colorado Protocol Agreement, BLM invites SHPO, public, governmental, and Native American participation in all planning efforts. According to BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places, whether as an individual site or as a district, is not a land use planning decision and is therefore outside the scope of this EIS.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The following recommendations are applicable to Alternatives A, B and C as each relates to oil and gas development in the Vermillion Basin: -The Vermillion Canyon sites upstream from the canyon gorge (5MF756 and MF758) are highly susceptible to damage from off-road vehicle use and the associated arroyo cutting and vandalism. Adverse impacts can be minimized by prohibiting vehicle travel in the area surrounding the gorge, including canyon rims above and areas below.	The Draft RMP/EIS, Alternative C, closes the southwest portion of Vermillion Basin, including the southern portion of the Irish Canyon ACEC, to OHV use.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Section 110 of the National Historic Preservation Act unequivocally specifies the responsibilities of federal agencies to proactively identify and evaluate National Register-eligible historic properties under their jurisdiction or control. There is no evidence the LSRA has aggressively pursued its responsibility to nominate properties to the National Register. In fact, none of the National Register properties located within the political boundaries of the LSRA were nominated by the BLM. This stands in decided contrast to other federally managed areas in Colorado. For example, in Montezuma County there are six National Register prehistoric archaeological districts that cover a total of 842,880 acres, three of which are managed by the BLM or Forest Service.	The cultural resource decisions in chapter 2 of the Draft RMP/EIS outline by alternative which areas would receive priority for Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the field office. In addition, the Draft RMP/EIS cultural resource program goal A is to complete site nominations to the NRHP.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The archaeological resources of the LSRA are admittedly not as visually remarkable as those in southwestern Colorado. But visual appeal is not a definitive standard whereby National Register sites or districts are deemed appropriate (see National Register Bulletin 16A). Many known archaeological sites are clearly eligible under Criterion A in that they are associated with broad patterns of human prehistory in northwestern Colorado; are eligible under Criterion C in that they embody distinctive characteristics of type, period or method of construction, or represent a significant and	In keeping with the National Programmatic Agreement and the Colorado Protocol Agreement, BLM invites SHPO, public, governmental, and Native American participation in all planning efforts. According to BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places, whether as an individual site or as a district, is not a land use planning decision and is therefore outside the scope of this

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		distinguishable entity, even if the individual sites lack distinction; and most importantly they are eligible under Criterion D in that they have yielded or are likely to yield important information about the prehistory of the region. Historic sites in the LSRA would be eligible under these three criteria, and potentially under Criterion B if they are associated with important individuals.	EIS.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	A review of the current data suggests significant inconsistencies in how sites were recorded and evaluated, and a considerable number need additional data for a National Register eligibility assessment. In many cases, site data and eligibility determinations have not been augmented since they were recorded in the 1970s. Some sites are presently considered ineligible, although they are clearly eligible. One of these ineligible sites has two prehistoric rock art panels with a minimum of 10 figures located within a rock shelter with a concentration of lithic debris suggestive of cultural deposits. These data offer further evidence that Draft EIS discussions related to various alternatives are based on incomplete and inadequate archaeological data as they relate to site significance and eligibility. Consequently, there could be significant future adverse effects on vast numbers of historic properties that are presently unknown due to BLM - a data gap that may be a direct consequence of the BLM's ambivalence toward its Section 110 mandates in the past. In effect, the failure to incorporate long-term cultural resource planning in the past has resulted in a paucity of quality baseline data that makes it extremely difficult to adequately consider cultural resource protection in the future.	In preparing the Draft RMP/EIS, BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is the result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. In addition, a land use plan decision is not required to perform Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the field office. Chapter 2 of the Draft RMP/EIS outlines by alternative which areas would receive priority for Section 110 inventories.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The Draft EIS states the intent of the BLM to embrace its Section 110 responsibilities. The preamble to Section 2.5.9 (Cultural and Heritage Resources) states "The LSFO will implement a proactive cultural resource program required under Section 110. A reasonable amount of outreach/customer service work, Native American consultation, interpretation and environmental education, cultural resource inventories, data recovery and recordation efforts, restoration and protection of at risk site efforts, and systematic monitoring of cultural sites treatments are to be completed annually. The level of proactive cultural resource program work would be determined annually within constraints of available funds and staff" The above-stated intent is laudable and has the potential to become a model for BLM management of cultural resources on public lands. However, the historic practice in BLM field offices throughout the West has been to prioritize budgets based on greatest demand, usually to the neglect of non-consumptive management initiatives. In	The Draft RMP/EIS has been revised to reflect the accurate number of sites that are on the National Register of Historic Places. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the field office. Chapter 2 of the Draft RMP/EIS outlines by alternative which areas would receive priority for additional Section 110 inventories. The Draft RMP/EIS cultural resources program goal A objective B addresses partnering for assistance with various cultural resource management functions. The Draft RMP/EIS contains priority sites for nomination to the National Register of Historic Places. This list of sites was developed through consultation efforts with SHPO and through public scoping and comments on the draft.

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		the case of the Little Snake Resource Area, as well as in adjacent field offices, these annual budgets have been focused predominantly on the expedited extraction of energy resources. The caveat that the level of "proactive" cultural resource work would be determined annually within the constraints of budgets and staff is disconcerting in that those constraints provide a convenient avenue for LSRA managers to defer indefinitely their Section 110 responsibilities to engage in proactive cultural resource management. Given that non-energy-related budgets have been static or have declined in recent years, there would appear to be little incentive for the LSRA to prioritize funding for non-project-driven initiatives. However, the information contained in the Draft EIS regarding National Register sites is misleading and perhaps inaccurate. Section 3.1.10.1 Current Conditions states that 30 sites are listed on the National Register of Historic Places (Draft EIS 3-77). A CPAA review of the National Register Information System (NRIS) database reveals that there are 12 National Register sites and one archaeological district in all of Moffat County, 13 National Register sites in all of Routt County, and none in the small portion of Rio Blanco County within the boundaries of the LSRA. The Draft EIS fails to acknowledge that most of the listed sites are historic buildings in private ownership, or are properties in Dinosaur National Monument that were nominated by the National Park Service. Further examination of the NRIS database reveals the LSRA has not nominated a single site to the register. These data also reveal that only one archaeological site and one archaeological district, both in Dinosaur National Monument and outside the purview of the BLM, have been formally listed. Given these considerations it is recommended that: -The EIS should explicitly state that proactive cultural resource work is a critical need accentuated by accelerated energy development, increased OHV use and other uses. The level of proactive cultural resource program work should be determined annually, and funding for such work should be prioritized within the LSRA budget. - Funding shortfalls to address issues like site monitoring and protection can be ameliorated through partnerships with advocacy groups, non-profit organizations and research entities through the aggressive use of Challenge Cost Share grants and other non-BLM funding sources. The EIS should explicitly state the willingness of the BLM to engage non-governmental partners in its proactive cultural resource management initiatives.	

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		-Section 3.1.10.1 of the EIS should be modified to reflect the actual number of National Register properties on lands administered by the BLM (currently there are none), not those in private ownership or managed by the National Park Service. - The BLM should aggressively pursue the nomination to the National Register of historic properties under its jurisdiction, including archaeological sites and archaeological districts of local, regional and national significance. This list of priority nominations should be expanded to include an archaeological district in the Spring Creek area that have made immeasurable contributions to an understanding of Archaic lifeways in the American West, as well as rock art sites in the Vermillion Basin and Cold Springs Mountain (see discussion above). - The BLM should aggressively seek public input regarding which sites should be prioritized for nomination. This could include discussions with the Colorado Council of Professional Archaeologists, local and statewide historical societies, and historic preservation advocacy organizations such as the National Trust for Historic Preservation.	
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	The draft EIS contains many deficiencies related to cultural resources, some serious (e.g., Native American consultation, the failure to consider indirect and cumulative effects), and others less significant (e.g., a need to enhance the prominence of cultural resource protection in all aspects of the planning document). The overriding concern identified throughout these comments has been the paucity of baseline data over the past two decades whereby informed management decisions could be made. The BLM simply does not know the quantity, diversity or density of cultural resources under its jurisdiction, and hence management decisions have been predicated on incomplete or inadequate information.	In preparing the Draft RMP/EIS, BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is the result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. In addition, a land use plan decision is not required to perform Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the field office. Chapter 2 of the Draft RMP/EIS outlines by alternative which areas would receive priority for Section 110 inventories.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	Clearly, the Draft EIS is attempting to assess the adverse effects for archaeological sites across millions of acres with practically no relevant Section 110 survey data. The conspicuous information currently available - such as the widespread rock art - suggests a much higher site density in some of these locales than are currently documented, and that known sites comprise a small part of a largely unseen and undocumented prehistoric presence in this area. It is also evident that the number of National Register-eligible sites is likely much greater than current documentation suggests, and that	In preparing the Draft RMP/EIS, BLM used the best available information to form the basis for the cultural resources analysis. This baseline data is the result of Section 106 and 110 inventories of the area and represents the volume of information available. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. In addition, a land use plan decision is not required to perform

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		adverse effects, especially in the Vermillion Basin and Cold Springs Mountain areas, will be much greater than anyone can possibly know at this time. These effects will be exacerbated if areas that are currently roadless are opened to increased on-road and off-road vehicular traffic or energy development.	Section 110 inventories. Proactive Section 110 cultural surveys are taking place on a case-by-case basis throughout the field office. Chapter 2 of the Draft RMP/EIS outlines by alternative which areas would receive priority for Section 110 inventories.
Cultural and Heritage Resources	Colorado Plateau Archaeological Alliance	If the BLM proceeds with its preferred Alternative C, the damage to significant numbers of irreplaceable cultural resources, particularly in the Sand Wash Basin and Vermillion Basin, would be substantial. The avoidance of archaeological sites as a preferred mitigation strategy is laudable, but it fails to consider the indirect effects of such actions on the location and setting of historic properties. Nor does the Draft EIS acknowledge that when avoidance is not possible that mitigation efforts such as data recovery are adverse effects that must be considered within the context of Section 106 compliance.	BLM's policy is to fully protect cultural resources. Protection is accomplished by considering direct, indirect, and cumulative effects, and developing mitigation actions to address adverse effects. In general, BLM's preferred method of mitigation is site avoidance. Additionally, the APE for any project is determined in consultation with the appropriate SHPO/THPO in accordance with 36 CFR 800.4(a)(1). This will occur upon initiation of the Section 106 consultation process for this RMP. The combination of avoiding sites and analyzing the agreed-upon APE will protect cultural sites to the extent possible while meeting BLM's multiple use mission and complying with federal and state laws and regulations. In addition to this, the Proposed RMP/Final EIS has been revised to include the clarification that scientific excavation would be an adverse effect under Section 106.
Cultural and Heritage Resources	Form Letter #8	The medicine wheel near Irish Canyon is another example of a site that would be very much endangered by development of any kind. There is already an old jeep trail that crosses the site; it is, thankfully, currently closed to vehicular traffic. If the county is successful in its attempt to assert R.S. 2477 claims, this road would suddenly be accessible to motor vehicles of all kinds, and the wheel would be ripe for plunder and destruction.	The Draft RMP/EIS limits OHV designations to area designations, which are decisions that identify lands as either open to cross country OHV use, limiting OHV use in some manner (usually limiting to existing or designated routes), or closed to OHV use. The designation of specific OHV routes in the limited OHV category is an implementation level decision. No routes are being proposed for designation in the Draft RMP/EIS or the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Form Letter #8	BLM should take the initiative and conduct a proactive inventory of the resource area to better understand what resources are present in order to prevent any further molestation or destruction of culturally sensitive sites. This should be done not just for individual artifacts, but also on the landscape level so that we might have a better understanding of the peoples that once lived here. Additionally, BLM should implement an educational program for citizens to better understand the importance and fragility of the sites in question. BLM must conduct Class III surveys on a landscape basis not simply	See General Comment Response #39

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		on a site-by-site basis	
Cultural and Heritage Resources	Form Letter #8	Cultural resource sites must be protected from livestock damage.	BLM reviews all permitted actions for their potential to impact cultural resources, including term grazing permits. The BLM range and cultural resource programs coordinate on livestock grazing actions to identify and mitigate any impacts to cultural resources from livestock grazing at the implementation level. Compliance with Section 106 in relation to livestock grazing management actions will comply with IM-CO-2006-029, Interim Historic Preservation Guidelines and Procedures for Evaluating the Effect of Rangeland Management Activities on Historic Properties, as well as any completed guidelines following formal consultation. The Draft RMP/EIS does identify, at the landscape-level commensurate to the level of decisions proposed, that impacts to cultural resources could occur due to livestock grazing. During more specific planning/permitting activities any of these potential impacts would be further identified and mitigated, per BLM policy.
Cultural and Heritage Resources	Beverley Henderson	The petroglyphs are art and history that belongs to everyone. Off road vehicle use will result in them being destroyed by a tiny percentage of the population thereby denying their beauty to everyone.	Impacts from OHV use on cultural resources are identified in the Draft RMP/EIS, Section 4.3.9. There is no evidence that OHV use results in the destruction of petroglyphs and the commenter does not present any evidence to support the claim.
Cultural and Heritage Resources	Henry Keesling	The recreation program's proposed OHV play area in South Sand Wash and other areas designated as OPEN will cause impacts to cultural resources present in these areas. This is not adequately discussed nor is an analysis provided to fully understand the cultural impacts this will cause. There is no NEPA environmental analysis, EA, provided in this document that covers the seven critical elements for such a proposal. There is neither a Section 106 nor a Native American Consultation for the proposed South Sand Wash OHV play area or the proposed OPEN areas. The lack of analysis and needed activity level planning efforts confuse the readers into thinking that BLM is protecting cultural resources.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	These proposed actions, South Sand Wash OHV Play Area and the proposed OPEN areas, will result in hundreds of eligible to the National Register of Historic Places cultural resources receiving irreversible, irretrievable, cumulative impacts to known and yet-to-be	See General Comment Response #47

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		recorded sites and significant data loss. This is not discussed or analyzed at all in the document, p4-242: 4.8 UNAVOIDABLE ADVERSE IMPACTS and other areas in the document.	
Cultural and Heritage Resources	Henry Keesling	LSFO has not provided a clearly stated rationale for not following established NEPA and Section 106, Native American Consultation, analysis, mitigation and protection of cultural resources for these proposed projects. LSFO instead has proposed a new method, policy, an after-the-ROD is signed 5 year plan to address cultural resources. This is not a Colorado Bureau of Land Management Policy for project specific NEPA EA analysis or Section 106 Native American Consultation processes. All seven critical elements that would be analyzed in a NEPA EA have not been analyzed.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	The impacts resulting from the OHV play area and OPEN areas have not been displayed. The NEPA validity of the portions of Alternative C OHV play area and OPEN areas is in question. Discussions with the BLM Washington Office, the Colorado State Offices, and the Colorado State Historic Preservation Office, and the Native American Consultation have not taken place to validate this action. LSFO needs to provide a clear statement as to why such actions were not undertaken.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	Reviewing LSFO's previous efforts, i.e., Management Frame Work Plans (1970s) and LSRA RMP (1989), to do anything related to cultural resource program development in Sand Wash, show that funding is not provided for those proposed "5 year" plans. BLM's current 5 year proposal for OHV play area and OPEN areas again will not be funded and again will not protect known and yet-to-be recorded National Register eligible cultural resources.	Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation. However, language was added to the Proposed RMP/Final EIS to close open area if inventories have not taken place within five years, addressing the potential continued loss of unknown cultural resource sites.
Cultural and Heritage Resources	Henry Keesling	Regarding Section 106, Native American Consultation and Section 110 cultural program development are all major components in understanding cultural resources in northwest Colorado. Mashing together Section 106 and Section 110 concepts causes confusion and lack of focus. Section 106 support and Section 110 program development functions must interact with each other, be dynamic, and allowed to grow.	Specific functions of both the Section 106 and Section 110 portions of the cultural resources program are separated in the cultural resource goals and objectives in the Draft RMP/EIS Section 2.5.9.1.
Cultural and Heritage Resources	Henry Keesling	There is no adequate, complete discussion of the impacts to cultural and other affected resources that will result from the OHV play area and OPEN areas designation in Alternative C. Adaptive management discussions, pages 2-227, 4-175 and 4-176 are	The Draft RMP/EIS identifies potential impacts to cultural resources in the South Sand Wash area in Section 4.3.9.3. Impacts from areas open to OHV use are identified for each other resource where

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		incorrect as to the application of adaptive management.	impacts would be anticipated. These impacts have been updated to reflect the revised size of the South Sand Wash SRMA, as well as more recent cultural resource inventories. An analysis of the impacts of OHV use on cultural resources is included in chapter 4 of the Draft EIS, including estimating the number of sites that could be damaged by “open” OHV use based on the cultural sensitivity maps (maps 3-23 and 3-24), ranging from 9,347 estimated sites under Alternative B to 157 estimated sites under Alternative C to 0 sites under Alternative D. As the commenter provides no detail for why the existing analysis is not adequate, no further response can be generated. In relation to the adaptive management discussions, language in these areas has been removed from the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Henry Keesling	The discussion on pages 4-175 and 4-176, 4.4.3.3 Alternative C second paragraph regarding designating areas as being open, limited or closed to OHV is contradictory to any established BLM LSFO planning effort. This paragraph should be read by all resource programs to understand what impacts will occur from this proposed action.	The impacts in the Draft RMP/EIS on pages 2-227, 4-175, and 4-176 have been revised to remove the concepts of adaptive management resulting in protection of resources. All BLM resource programs have reviewed the Draft RMP/EIS and the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Henry Keesling	For cultural/paleontological program resources the statement relating to "...adaptive management...indicators show..." on page 4-146 disregards the known significant cultural and paleontological resources present in the proposed south Sand Wash OHV play area. By allowing OHV activities in this area, before the transportation plan is initiated, how will known cultural resources be protected following this approach Clearly, "...indicators...", especially significant cultural resources, are present. Clearly, the "development and implementation of a transportation plan" needs to be undertaken now!	The impacts in the Draft RMP/EIS on pages 2-227, 4-175, and 4-176 have been revised to remove the concepts of adaptive management resulting in protection of resources. Impacts from the OHV decisions on cultural and paleontological resources are located in the Draft RMP/EIS, Sections 4.3.9 and 4.3.10, respectively. The BLM 1601-1 planning handbook states that designation of areas as open, limited or closed to OHVs is a land use plan decision while transportation planning is an implementation-level decision.
Cultural and Heritage Resources	Henry Keesling	The proposed new process, Alternative C, indicated that immediately after the ROD is signed the OHV play area and OPEN areas would be open to impacts. This is not the current NEPA or SECTION 106, Native American Consultation process for proposed projects in LSFO. The reader is provided with a number of confusing and misleading statements throughout the document.	See General Comment Response #47
Cultural and	Henry Keesling	The LSFO statement, p1-14, "Cultural and heritage resources would	See General Comment Response #47

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Heritage Resources		be managed according to existing legislation, regulation, executive Orders, and BLM policy" is not true. In the case of Alternative C, OHV play area and OPEN areas will not go through any SECTION 106 and Native American Consultation prior to these extremely aggressive surface disturbing activities being allowed on approximately 21,940 acres. It is unclear if this is a correct total acre figure or represents just the OPEN areas acres. The proposed actions, OHV play area and OPEN areas, will result in irreversible, irretrievable, cumulative impacts to known and yet-to-be recorded NRHP eligible sites and significant data loss. The proposed actions are a violation of the Archaeological Resource Protection Act 1979, amended. These actions knowingly counsel the destruction of cultural resources. This has civil and criminal penalties. LSFO should check on this with the Regional Solicitor before proceeding.	
Cultural and Heritage Resources	Henry Keesling	The proposed 5 year after-the-fact planning for cultural resource identification and protection is suggesting participation in a vague, not funded, 5 year effort to manage the OHV play area. Further, there is no mention of any management for the OPEN areas that are being designated. Please provide narratives dealing with what happens after the 5 years, and nothing has been done to protect resources. Please develop a narrative that addresses what happens during any of the 5 years, when no funding is provided for the alluded to efforts to protect cultural resources. At least provide a narrative that deals with management in future years with funding after the initial 5 years is over.	Based on consultation efforts with SHPO there was a change in the approach noted in the Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas within five years. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.
Cultural and Heritage Resources	Henry Keesling	I suggest that the signed ROD would allow the planning, resource and cultural studies, mitigation, increase of recreation staff, law enforcement, infrastructure construction, signs, etc. to take place within a 5 year time frame before impacts are allowed to occur. The signed ROD would place the OHV play area in a closed status except for numbered Moffat County roads and numbered LSFO BLM roads. The areas designated OPEN areas would be closed except for numbered Moffat County roads, numbered LSFO BLM roads, and numbered state or federal agency roads.	Alternative D of the Draft RMP/EIS considers limiting OHV use in the South Sand Wash area to designated routes. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP.
Cultural and	Henry Keesling	There is an overall lack of discussion and analysis presented for	See General Comment Response #47

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Heritage Resources		these areas (OHV open areas) throughout the document. These OPEN areas need to be discussed in greater depth and an analysis for cultural resources provided. The seven critical elements, which are standard in a NEPA EA document, need to be provided as well.	
Cultural and Heritage Resources	Henry Keesling	Using the current established NEPA and Section 106, Native American Consultation, and an environmental analysis, EA, procedure, a section has to be added to the document. All seven critical elements of a NEPA document need to be in the analysis for the proposed OHV play area and OPEN areas. If this is not undertaken, a clear statement addressing why not needs to be made.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	Map 3-40, OHV Designations is unclear as to what this is showing. Are these the current situations in LSFO? If so, please state that on the map. This may also exist on other maps, and will need to be addressed. Maps for this DRAFT review should be at least 1:100,000 scale and provided with the document.	As all chapter 3 maps show, Map 3-40 shows OHV designations in the existing environment, which is the same as Map 2-45 (OHV designations for Alternative A). This is specifically noted in chapter 3 and does not need to be clarified on the map itself. The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. Map content was developed from BLM standard GIS datasets and presented on the maps with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The 8 1/2" by 11" format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review. However, commenters seeking more specific detail could have contacted the BLM Little Snake Field Office to obtain more detailed information. Such an avenue was encouraged in the Draft RMP/EIS Notice of Availability in the Federal Register.
Cultural and Heritage Resources	Henry Keesling	Executive Summary has not adequately informed the Public that the OHV play area, zone 1 and zone 2, and other OPEN areas designations will not go through the current NEPA or Section 106 or Native American Consultation required for every project proposed to the BLM. A new process is being proposed. Please make a clear statement directed to this issue. How will an after-the-fact-effort protect known and yet-to-be recorded cultural resources? Explain why BLM will commit funds and staff to the new proposed after-the-fact efforts but will not fund the necessary and required cultural	The Draft RMP/EIS identifies potential impacts to cultural resources in the South Sand Wash area in Section 4.3.9.3. These impacts have been updated to reflect the revised size of the South Sand Wash SRMA, as well as more recent cultural resource inventories. An analysis of the impacts of OHV use on cultural resources is included in chapter 4 of the Draft EIS, including estimating the number of sites that could be damaged by "open" OHV use based on

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		analysis and mitigation prior to the impacts happening. Discuss why, during the development of this DRAFT, no Activity Planning was developed or provided in the DRAFT. Project specific analysis of proposed projects must have Activity Plans developed to fully present and understand the impacts and funding needs. Is this new process based upon adaptive management. If so explain what legal and regulatory authorities exist that allow adaptive management to accomplish these actions?	the cultural sensitivity maps (maps 3-23 and 3-24), ranging from 9,347 estimated sites under Alternative B to 157 estimated sites under Alternative C to 0 sites under Alternative D. This analysis included an analysis of impacts on all the "critical elements" identified in BLM's NEPA handbook and regulations. BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). These documents identify inventory requirements, define the area of potential effect (APE), outline compliance with Section 106 when considering comprehensive travel and transportation management planning, and addresses monitoring requirements. BLM will comply with the direction in these documents during formal consultation with SHPO and future route designations. In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the Record of Decision is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the Record of Decision. Based on consultation efforts with SHPO there was a change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed

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			RMP/Final EIS. As explained in chapter 1 of the Draft RMP/EIS, activity planning will occur after the RMP is finalized and will undergo a separate NEPA process that addresses site-specific issues. The adaptive management component of transportation management has been removed in the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Henry Keesling	…by circumventing the established NEPA, Section 106 and Native American process, LSFO has not provided an analysis of the cultural resources present in the OHV play area or OPEN designation areas. The OHV play area is located in an area of high cultural resource sensitivity, and has many known prehistoric archaeological resources eligible to the National Register of Historic Places. An analysis of this proposed project area would show that there are potentially hundreds more yet-to-be recorded eligible cultural resources. Also an analysis would show that some of these cultural resources can be attributed to early Ute/Shoshone activity in northwest Colorado. Native American consultation has to take place.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	Please discuss throughout the document the irreversible, irretrievable, cumulative impacts to be known and yet-to-be recorded NRHP eligible sites, as well as significant data loss that will occur as a result of this proposed action. Has the OHV play area and OPEN designation areas been through the required Native American Consultation that every specific ground project has to go through?	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	Alternative C (Preferred Alternative) cultural resource analysis should be separated into two parts. First: Provide an adequate cultural resource analysis section. This would be similar to cultural resource analysis that is used for all BLM programs and industry initiated projects. Those proposed projects all follow the currently established NEPA and Section 106, Native American Consultation process and analysis. Those projects result in no irreversible, irretrievable, cumulative impacts to known and yet-to-be recorded NRHP eligible sites. Second, point out that a proposed new process is being offered to circumvent the current established Section 106 and NEPA processes. Point out that the new process has not been discussed with the BLM Washington Office or the BLM Colorado State office, or the Colorado State Historic Preservation Office, nor has Native American Consultation been carried out. All of these actions should have been completed prior to introduction into the DRAFT document at his time.	See General Comment Response #47

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		Further, consider that the proposed new process has been litigated in federal court and was found to be a violation of NEPA and the National Historic Preservation Act 1966, amended. It is also a violation of ARPA 1979, amended, in that the proposed process knowingly counsels the destruction of cultural resources. This proposal has criminal and civil penalties. The statements presented here lead the Public to believe that the current process for NEPA and Section 106, Native American Consultation are going to be followed. They are not. This needs to be corrected.	
Cultural and Heritage Resources	Henry Keesling	p. ES-l0 Cultural and Heritage Resources: There are two paragraphs here. The information should be presented that way. All Section 106, 36 CFR 800, and Colorado Protocol (1998) requirements should be in one paragraph, and the Section 110 program work in the other. Please note that proactive work, program development work i.e., Section 110, is used to "develop the cultural program" not to provide additional, Section 106, cultural field work to support other BLM Benefitting Activity program's unfunded proposals.	The Executive Summary, where the language quoted was obtained, is meant to summarize the types of decisions contained in chapter 2 of the Proposed RMP/Final EIS. Further detail for these decisions is contained in chapter 2, including a clearer separation of the Section 106 and Section 110 functions of the cultural resources program. Further specifying that no Section 110 inventory should be used to support Section 106 field work is not necessary, as such a clarification is already within BLM policy.
Cultural and Heritage Resources	Henry Keesling	The needed cultural program work proposed for Sand Wash has been written into all previous Little Snake planning documents but the work was never carried out. Why and how will this effort be different?	Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation. However, language was added to the Proposed RMP/Final EIS to close open area if inventories have not taken place within five years, addressing the potential continued loss of unknown cultural resource sites.
Cultural and Heritage Resources	Henry Keesling	p. ES-10: The last three sentences need to be reviewed and maybe deleted or moved around in the section. They appear to be thrown into the discussion with little thought. Clearly the confusion between Section 106 support work and Section 110 cultural program development is still present. This is not a difficult concept to grasp. The other concept "...relocated to a site in which surveys reveal little or no cultural resources" further confuses this reader. There are three topics here. Section 106, Section 110 and the Protocol. These all guide cultural resource management for Little Snake Field Office. These documents can be cited and/or placed in an Appendix. A partial discussion of these processes develops confusion as to what is going to happen or not happen.	The Executive Summary, where the language quoted was obtained, is meant to summarize the types of decisions contained in chapter 2 of the Proposed RMP/Final EIS. Further detail for these decisions is contained in chapter 2, including a clearer separation of the Section 106 and Section 110 functions of the cultural resources program.

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Cultural and Heritage Resources	Henry Keesling	Suggest that all LSFO managed federal lands be placed into a category that uses only designated numbered County roads and numbered BLM roads. There would be no OPEN designation. Further, OHV play areas would be allowed only after NEPA and Section 106 obligations are completed. Understanding what is stated at ES-10 is important, and it is the law. BLM has no mandate to provide "quality OHV experiences". BLM's mandate is to provide quality management and to provide stewardship for cultural resources.	Alternative D of the Draft RMP/EIS considers limiting OHV use in the South Sand Wash area, and throughout most of the RMPPA, to designated routes. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP. Part of BLM's policy, as declared in FLPMA, is to "...provide for outdoor recreation..." BLM will comply with all applicable laws, regulations and policies.
Cultural and Heritage Resources	Henry Keesling	p. 1-13, p1-14 1.6.6 Cultural and Heritage Resources. (end of third paragraph) The Archaeological Resources Protection Act of 1979 (ARPA), amended, should be in its own paragraph. Having portions in the paragraph with the NHPA and then again in the next paragraph as ARPA is confusing. Plating ARPA in one paragraph, in the same format as the other paragraphs, will help in understanding this section.	The specific listing and explanation of every applicable law, Executive Order, or policy is not necessary or prudent for this document. The language at the front of Section 1.6 has been revised in the Proposed RMP/Final EIS to note that these laws are for “certain major federal authorities.” Other authorities are sure to apply or could be presented in a different manner or with more specifics, but adding additional detail here will provide no additional legal veracity and weight to the cultural resource program within the RMP decisions.
Cultural and Heritage Resources	Henry Keesling	p. 1-14 The Colorado Protocol (1998) and the BLM 8100 Manuals should be added to the last paragraph.	The Proposed RMP/Final EIS has been revised to include a reference to the documents identified by the commenter.
Cultural and Heritage Resources	Henry Keesling	p. 2-32, 2.5.9. Cultural and Heritage Resources (top of page partial paragraph)Again there is confusion in the document with Section 106 and Section 110 cultural program development. Native American Consultation is a Section 106 requirement as currently defined in 36 CFR 800 and in the Protocol (1998). The discussion of LSFO's proactive Section 110 program work needs to be in a paragraph by itself.	The summary portion of Section 2.5.9 does move from one concept to another without paragraph breaks. However, a clearer separation of the Section 106 and Section 110 functions of the cultural resources program is contained in the goals and objectives portion of Section 2.5.9.1.
Cultural and Heritage Resources	Henry Keesling	p. 2-23 The first full paragraph is not well developed. Please cite the existing LSFO Protocol and IM/IB policy stating when consultation with the Native American groups will be undertaken. Partial and misleading statements should not be a part of this document.	Repeating each guiding policy and manual direction is not necessary to allow BLM to implement it. This introduction to cultural resource management actions is not intended to provide the full legal, regulatory, and policy direction for cultural resources, but to provide a brief introduction to cultural resource management. Additional legal and policy information was presented in chapters 1 and 4.
Cultural and Heritage Resources	Henry Keesling	p. 2-32 2.5.9.1 Resource Goals and Objectives: The two goals, A and B, represent Section 110 program development efforts. If the efforts that were put forward in the last RMP had been completed	Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel

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		instead of ignored and not funded, these two goals would have been completed. But that is history, and current management would have one believe that history does not repeat itself nor is it worth discussing or learning from. What "goals" will be used to see that these are attained? That too should be a stated goal and objective.	develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.
Cultural and Heritage Resources	Henry Keesling	Goals for the cultural program are necessarily developed in two aspects. Section 106 program support is the primary function of the LSFO cultural program. Section 110 is cultural program development. The two sets of goals need to reflect each other as Section106 represents data collection while Section 110 represents the analysis and understanding that is needed to support the Section 106 data collection. Develop goals that reflect this simplistic view. Current Goals are flawed by the lack of understanding of the cultural program in LSFO.	While each function of the cultural resources program reflects on the other, each is a separate function with BLM policies regarding cultural resources (BLM-M-8100 Section 06.0, Policy) as the common thread running through each function. These goals were developed with close coordination with BLM cultural resource specialists at the field office and state office levels and reflect the interaction between the two functions of the cultural resource management program.
Cultural and Heritage Resources	Henry Keesling	p. 2-32 - 2.5.9.1 - Program Goal A: Please review the current LSRA RMP and use the cultural resource management plans that are described there. As for the rest of these "Goals", so far they are not addressed or funded just as they were not in the past 25 years. How about coming up with something "new" that will work.	The plans noted in the existing RMP are identified in Section 2.5.9.2 under the Cultural Resources Program header, Alternative A. Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.
Cultural and Heritage Resources	Henry Keesling	p. 2-32 Support Services Goal A: please understand that Native American Consultation is not something that the Cultural program must do. Any program, any person in the Field Office can do this.	As noted in BLM-M-8120 (Tribal Consultation Under Cultural Resource Authorities), it is the Field Office Manager's responsibility to initiate contact and consult with tribes. It is also understood that the Field Office Manager can seek the assistance of any field office staff member to assist in this responsibility. In most field offices the staff assistance is the cultural resource specialist.
Cultural and Heritage Resources	Henry Keesling	p. 2-32 Second bullet: This is a function of the State Office and the Government to Government relationship that exists between the Federal government and the Native Americans. Present the goal as LSFO supports the efforts and needs to participate in the process when it is undertaken by these higher organizational levels.	While assistance or even lead direction could be provided by the state office, this objective is for how the Little Snake Field Office will achieve the goal of developing an in-depth understanding of archeological and historical resources.
Cultural and Heritage Resources	Henry Keesling	p2-32 - Third bullet: State this in Section 110 goal B.	Cultural Resources Program Goal A addresses compliance with BLM's National Historic Preservation Act Section 110 responsibilities, which includes nomination to the National Register of

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			Historic Places (Section 110(a)(2)(A)). Cultural Resources Program Goal B addresses compliance with BLM policy as outlined in BLM Manual 8110 (Identifying and Evaluating Cultural Resources), specifically that identified in Section .4 of that manual. While there is philosophical and managerial overlap between nomination of sites to the National Register and categorization of sites to use categories, each has a separate authority and purpose, and therefore they have been presented separately in the Draft RMP/EIS.
Cultural and Heritage Resources	Henry Keesling	p. 2-33, Last bullet: I am at a loss on how the cultural resource program could "improve law enforcement". The program has always supported and provided funding. Without an adequate understanding of what "improve law enforcement" means here, this is another non-goal. However, let me suggest that having no designated OPEN areas will improve law enforcement officers (LEO's) ability to protect cultural resource concerns and other resources too.	Implementation of the goals and objectives noted in Section 2.5.9.1 of the Draft RMP/EIS is not limited to the cultural resource program staff alone, but how BLM will manage its cultural resources. Law enforcement is an integral part of successfully protecting cultural resource sites, therefore it is included in this section.
Cultural and Heritage Resources	Henry Keesling	Alternative B should be displayed as Alternative C the preferred alternative. Alternative B should reference Alternative C. Having to bounce around throughout the entire document to understand the cultural preferred alternative is overly complicated and disruptive. Further, Alternative C needs to include what is written in Alternative A. Alternative A, as written, is the basis of the cultural resource management program. Without these basic documents and understanding of cultural resources in northwest Colorado and the region, which already exist, what is the use of doing Alternative B?	The alternatives are presented in the order the material/decision is first considered in the RMP. In the case of the Cultural Resources Program heading, Alternative B is presented first, then Alternative C, which is the same as Alternative B and therefore references it. Concerning including Alternative A in Alternative C, the cultural management plan can be prepared with or without specific mention in the RMP. Additionally, the lack of mentioning the Class I Overview does not indicate that BLM plans on not using it, but that it is part of the existing environment, summarizing existing knowledge of the RMPPA's cultural resources. These sources will be used while implementing all the alternatives, and don't have to be specifically mentioned to allow such use.
Cultural and Heritage Resources	Henry Keesling	The cultural program provides a technical support, Section 106, to get these proposed projects, industry or BLM, through the NEPA Environmental Analysis, EA, process. Thus, if there are a lot of these proposed program projects, then there is a lot of Section 106 cultural program focus/work. Work Load Analysis carried out in LSFO over the years shows this to be about 90 percent of the work.	The actions under the cultural resources program address the non-support function of the cultural resources program. The support function is largely driven by existing laws, regulations, and policies and needs little more in the RMP to implement. However, the function of the cultural resources program to gain more information about the cultural resources within the RMPPA and to monitor and protect those

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			resources takes more strategic planning, which is what these alternatives identify.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 Alternative B: Without the discussions in Alternative A and having those studies in place, what is proposed cannot be started nor completed.	The cultural management plan can be prepared with or without specific mention in the RMP. Additionally, the lack of mentioning the Class I Overview does not indicate that BLM plans on not using it, but that it is part of the existing environment, summarizing existing knowledge of the RMPPA's cultural resources. These sources will be used while implementing all the alternatives, and don't have to be specifically mentioned to allow such use.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 - The bullets: 1. Please add in Vermillion Basin, and Browns Park. "Irish Canyon" should be Irish Canyon ACEC.	The priority areas have been modified in the Proposed RMP/Final EIS. BLM prefers the areas currently listed. The clarification for Irish Canyon is not needed, as the management plan could be limited to the ACEC, or address resources beyond the ACEC boundary. Additionally, Irish Canyon is not designated as an ACEC in each alterative.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 - 2. The term "sites" should be changed to areas. "Irish Canyon" change to Irish Canyon ACEC. Please add in the Cross Mountain rock art/rock shelter complex.	The Proposed RMP/Final EIS was revised to "areas." The priority areas have been modified in the Proposed RMP/Final EIS. BLM prefers the areas currently listed. The clarification for Irish Canyon is not needed, as the management plan could be limited to the ACEC, or address resources beyond the ACEC boundary. Additionally, Irish Canyon is not designated as an ACEC in each alterative.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 - 3. Irish Canyon rock shelter is located on private land. It should be dropped from the list. The Red Army rock shelter no longer exists as such, and should be dropped. Please add in the Cross Mountain rock art/rock shelter complex.	The priority areas have been modified in the Proposed RMP/Final EIS. BLM prefers the areas currently listed.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 - 4. NRHP, nomination documentation needs only to include those sites listed in the bullets above. Leave out Red Army rock shelter.	The priority areas have been modified in the Proposed RMP/Final EIS. BLM prefers the areas currently listed.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 - 5. Interpretation sites: Please understand that the cultural program provides, as requested, cultural data/information to the recreation program for recreation "interpretive sites" development. The cultural program itself does not maintain interpretive sites. This is a function of the recreation program. The recreation program's Irish Canyon interpretive site still needs to be maintained by the recreation program. The cultural program cannot undertake yet	BLM manual direction (BLM-M-8110) to allocate all cultural resource sites to one of the six potential uses includes allocating a site to the public use category, which is to be applied "to any cultural property found to be appropriate for use as an interpretive exhibit in place, or for related educational and recreational uses by members of the general public." Again, the

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		another unfunded program. This document should not suggest that the cultural program take over this unfunded task.	commenter is maintaining a distinction that the cultural resources specialist would only implement the cultural resources portion of the RMP, and likewise with other resources and uses. The RMP identifies how BLM proposes to manage the various resources and uses, which is accomplished by all the field office resource specialists. In the case of cultural sites allocated to public use, it would be anticipated that interpretive materials would be developed through collaboration of several BLM resource specialists.
Cultural and Heritage Resources	Henry Keesling	p. 2-33 Cultural Site Use Allocations: Use Allocations are interesting but so what? Please indicate how this will help the cultural program in its Section 106 and Section 110 efforts. Note that this is completed and is included in Appendix K, vol 2-2, k-1. Why is it mentioned as needing to be done?	Site use allocations, as described in BLM-M-8110, “establish what needs to be protected, and when or how use should be authorized.” The manual describes the advantage in doing this is that “it allows field office managers to know in advance how to respond to conflicts that arise between specific cultural resources and other land uses.” The manual also notes that “allocations shall be reevaluated and revised, as appropriate, when circumstances change or new data become available.” Therefore, the action is to take the initial allocations in the Draft RMP/EIS Appendix K, manage the sites according to their allocations, and reevaluate and revise, as appropriate.
Cultural and Heritage Resources	Henry Keesling	p2-34: My understanding of the OHV play area, not ever having seen maps at the data standard scale of 1:24000 nor being asked to provide Class I existing data analysis for the area, is this: In some of the proposed play area, Class Ill survey was completed and prehistoric archaeological resources were identified and are eligible to the National Register of Historic Places (NRHP). Most of these prehistoric cultural sites have been known for a long time, since the 1970s. This play area is designated within one of the highly sensitive cultural resource areas for LSFO. Further, Sand Wash has been a focus of the 1970s Management Frame Work Plan (MFP) and the LSRA RMP 1989 that this document is replacing. The required cultural work in Sand Wash proposed in both documents has never been carried out. The past track record indicates, and the DRAFT proposed OHV play area for South Sand Wash does not favor protection of the known cultural resources that are eligible to the National Register. Please fully address how cultural resources would be protected by this proposed action.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. Map content was developed from BLM standard GIS datasets and presented on the maps with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The 8 1/2” by 11” format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review. However, commenters seeking more specific detail could have contacted the BLM Little Snake Field Office to obtain more detailed information. Such an avenue was encouraged in the Draft RMP/EIS Notice of Availability in the Federal Register. BLM will comply with its Section 106 responsibilities related to

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			transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Based on consultation efforts with SHPO there was a change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. In addition, the Draft RMP/EIS includes language for Alternatives B and C in relation to mitigation of potential adverse effects to historic properties in open OHV areas. Specifically, the Draft RMP/EIS notes that "a monitoring program would be established to assess OHV impacts on cultural resources. On the basis of the results of monitoring, BLM would take any actions necessary to fulfill its obligations under existing law to protect cultural resources. This may include changing certain aspects of management of the area, such as allowable use, or implementing mitigation measures, such as fencing or closing areas." Finally, all management actions with the RMP are contingent on the proper funding. However, establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.

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Cultural and Heritage Resources	Henry Keesling	p. 2-34 - In addition, Alternative B, second paragraph, first sentence: Understand that "known cultural resources" are those that are identified and recorded. These are recorded cultural resources with known on-the-ground physical locations. They do not need to be identified again. They are "known". They do need to be protected from the proposed OHV play area impacts. This protection should take place before any activity is allowed in OHV play area. Providing a Class I existing data review of these areas is what is needed for the proposed actions. That cultural information would show that this area should not be used as an OHV play area. Address why this has not been done. How are the known cultural resources going to be protected as indicated on page 4-175 and 4-176 of this document?	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	p. 2-34 - The OPEN areas will require a Class I existing data review. Identified, known cultural resources will need to be immediately protected and managed for the life of the proposed action. Travel management plans will need to be developed in conjunction with Class III cultural survey analysis, mitigation and protection. The work needs to be completed before these areas are designated as OPEN. Further, as with the OHV play areas, this document needs to provide for the commitment of funds for the 5 year planning effort and future management of 1 these areas.	The Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP performed such a records search, and will be used during the SHPO consultation. In this regard, BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the Record of Decision is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the Record of Decision. Based on consultation efforts with SHPO there was a change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open

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			area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. Finally, establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.
Cultural and Heritage Resources	Henry Keesling	Have consultations, specific to the proposed new policy, with the Colorado State Historic Preservation Office (SHPO) and Native American Consultation been carried out? These consultations should have been completed prior to the DRAFT being reviewed by the Public. This requirement is clearly stated in 36 CFR 800. Review and comments by these two governmental agencies on this document is not consultation. Statements made at the start of the document about protecting cultural resources, and lack of further discussion at the end of the document, by omission, indicating no impacts to cultural resources, mislead the Public into believing that cultural resources will be protected.	See General Comment Response #47
Cultural and Heritage Resources	Henry Keesling	Being open for unmanaged/unrestricted use and impacts to cultural, paleontological and various other resources. Studies of these impacts "could" (p4-175, p4-176) follow later within 5 years. The conflict here is that this section, p2-34, Alternative C (Preferred Alternative) indicates that transportation plans, "would", be completed. However, p4-175 and p4-176 indicates that these actions would follow LSFO's adaptive management and collaborative processes with OHV user groups resulting in any plans or protection being subject to "could" be completed. Please clear up these statements.	It is anticipated that the proposed actions identified in chapter 4 would be implemented, hence the use of the word “would.” The word "could" was used several times in chapter 4, pages 4-175 and 4-176, as the certainty of the impact was not certain, but dependent on a variety of issues. The language associated with adaptive management that used the "could" language has been removed from this section in the Proposed RMP/Final EIS. The remaining uses of the word "could" in this paragraph are appropriate to the explanation of impacts under this alternative.
Cultural and Heritage Resources	Henry Keesling	In keeping with currently established Colorado BLM NEPA and Section 106 processes, I suggest that the 5 year study period planning/design and mitigation be carried out up front and prior to the area being available for these activities. This would allow for all the needed work, such as design/planning and mitigation, to be accomplished up front. Following the currently established NEPA and Section 106 processes would reduce overall project costs as well.	Alternative D of the Draft RMP/EIS considers limiting OHV use in the South Sand Wash area to designated routes. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP.
Cultural and	Henry Keesling	Also, a statement is needed to clearly describe what will happen	Based on consultation efforts with SHPO there was a

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Heritage Resources		when no funding is provided through the annual budget process. Will these OHV areas be left open with no management or protection? Will they be closed until funding is provided? After the 5 year time frame is completed and if only limited funding has been provided, will the areas be closed? Clearly state what will happen when no funding or only limited funding is provided. What happens after 5 years - no more management? Explain entire project life cycle. Please come up with something that will obligate funds for the protection of all resources in OHV play areas and OPEN areas.	change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Henry Keesling	p2-55, 2.6 Description of Resource Use Decisions: Under this heading, please provide a discussion of known and expected Cultural Resources that will be damaged and destroyed by not following existing Section 106 processes with respect to the proposed South Sand Wash OHV Play Area, OPEN areas. LSRA RMP (1989) in Appendix 21 has a method to develop an estimated number of cultural resources per Section. Page 2-86 of this DRAFT document indicates that the OHV play area will be 35,510 acres. Is this number consistent throughout the DRAFT document? Anyway, there are maybe 943 cultural resources with in this area. Of this total approximately 254 cultural resources, or 27 percent, will be eligible to the National Register. For Sand Wash these figures are expected to be on the low side. For the OPEN areas these estimated figures may be high. These figures will need to be incorporated with the known cultural resources that have been previously recorded and evaluated.	In an EIS, chapter 2 is not the location for the identification of impacts, but the alternatives. The Draft RMP/EIS identifies potential impacts to cultural resources in the South Sand Wash area in Section 4.3.9.3. These impacts have been updated to reflect the revised size of the South Sand Wash SRMA, as well as more recent cultural resource inventories. An analysis of the impacts of OHV use on cultural resources is included in chapter 4 of the Draft EIS, including estimating the number of sites that could be damaged by “open” OHV use based on the cultural sensitivity maps (maps 3-23 and 3-24), ranging from 9,347 estimated sites under Alternative B to 157 estimated sites under Alternative C to 0 sites under Alternative D. The acreages for the South Sand Wash SRMA will differ than the acreages for the South Sand Wash SRMA OHV “open” area (Recreation Management Zone #1). All acreages have been updated in the Proposed RMP/Final EIS to ensure consistency.
Cultural and Heritage Resources	Henry Keesling	Cultural Resource Program Objectives: Objectives 2 and 5 are the same.	While there are similarities, when referring back to the goal over each objective, the subtle differences are present in relation to the purpose of each objective in reaching the related goal.
Cultural and Heritage Resources	Henry Keesling	p. 2-142, Support Services Objectives: Objective Goal l:2 This is not a Field Office cultural resource program function. This should be carried out by the Colorado State Office as part of the Nation to Nation relationship BLM has with the Native American Groups. Past efforts to do this at the FO level have been stopped at the State Office. The 1990s nearly had a signed MOU with the Tribes. The effort was stopped by the Colorado State Office. Has policy changed at the Washington or State Office level to allow this? It is a good idea but the State Office and the Washington Office have to	While assistance or even lead direction could be provided by the state office, this objective is for how the Little Snake Field Office will achieve the goal of developing an in-depth understanding of archeological and historical resources.

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		undertake the effort. LSFO needs to be along for the ride as well. Develop this Goal with that in mind.	
Cultural and Heritage Resources	Henry Keesling	p. 2-142 - Objective Goal l:3: The assigning of Use Allocation to the known cultural resources in LSFO is a Section 110 effort. Please cite here that vol12-2, Appendix K of this document already has completed this Goal. Why is this a goal if it has been completed?	Site use allocations, as described in BLM-M-8110, “establish what needs to be protected, and when or how use should be authorized.” The manual describes the advantage in doing this is that “it allows Field Office Managers to know in advance how to respond to conflicts that arise between specific cultural resources and other land uses.” The manual also notes that “allocations shall be reevaluated and revised, as appropriate, when circumstances change or new data become available.” Therefore, the action is to take the initial allocations in the Draft RMP/EIS Appendix K, manage the sites according to their allocations, and reevaluate and revise, as appropriate. It is important to note that the allocation of cultural sites to a use category is not identified as a legal requirement of Section 110 of NHPA, but is a policy requirement from the BLM 8110 manual. While such allocations is not a support function (i.e., Section 106 compliance), that does not automatically mean it is a Section 110 function. There is more to cultural resources management than just Sections 106 and 110 of NHPA, part of which is accomplished with site use allocation.
Cultural and Heritage Resources	Henry Keesling	p. 2-142, Objective Goal 2:1: Class III cultural surveys needed in the Sand Wash areas, Hiawatha, and Powder Wash areas and other areas were indicated in the past. This level of work was recommended in conjunction with the LSRA RMP as supporting documents, during annual FY budget cycles, and along with the oil and gas Gold Book recommendation.	These are areas that would be inventoried in accordance with Section 106, not the proactive Section 110 inventories identified in the next row down. However, the objective does not identify areas for future surveys; that is accomplished in the next row down, under management actions. The list already includes the Sand Wash Basin. Regarding the remaining items, BLM prefers the areas currently listed.
Cultural and Heritage Resources	Henry Keesling	p. 2-142, Objective Goal 2:2: How does one improve "legal enforcement"? What does that mean? Explain how this can be undertaken by any program much less the cultural program. However, here are two suggestion to use as goals here. One: I suggest that the ARPA violation being proposed for the South Sand Wash OHV play area and OPEN areas could be prosecuted. Check with the Regional Solicitor on this and provide those comments.	Implementation of the goals and objectives noted in Section 2.5.9.1 of the Draft RMP/EIS is not limited to the cultural resource program staff alone, but how BLM will manage its cultural resources. Law enforcement is an integral part of successfully protecting cultural resource sites, therefore it is included in this section. However, establishing

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		Two: That there be no open areas designated. Open area designations allow for anything to happen there. This will result in citations or court cases being that more difficult to apply for impacts caused in these areas. That is a current problem. If the Public can do anything in an OPEN area how is LSFO going to be able to enforce specific laws.	budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation. Additionally, Alternative D of the Draft RMP/EIS considers limiting OHV use in RMPPA to designated routes. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP.
Cultural and Heritage Resources	Henry Keesling	p2-142-143: Bullets need to be altered to reflect a better understanding of the present condition and needs of the Section 110 cultural program: p2--142-143: 1. Please add in Vermillion Basin and Browns Park. Write "Irish Canyon" as Irish Canyon ACEC. This will take in the important sites along Vermillion Creek. 2. Include same areas as above. However, I am not sure what is to be done here. "Sites" means what? Do you mean "areas" here? Do you mean cultural resources - sites - that are known but unrecorded? Please note that 1 and 2 are the same, and can be discussed as one item. 3. Irish Canyon rock shelter is on Private Land. The Red Army rock shelter does not exist any longer. Reviewing the site records or visiting the location will show this. These two cultural resources should be removed from this list. "Cross Mountain rock shelter", according to the site form, is really a complex of shelters and rock art. These cultural resources should be designated as the Cross Mountain rock art/rock shelter complex. 4. Monitoring does not need to be carried out for the Red Army rock shelter, see above. "Irish Canyon" needs to be changed to the Irish Canyon ACEC, and "Cross Mountain rock shelter" changed to Cross Mountain rock art/ rock shelter complex. This will include all the cultural resources in these areas not just single sites. 5. The Same comments as above bullet apply for name changes and dropping Red Army rock shelter.	The priority areas have been modified in the Proposed RMP/Final EIS. BLM prefers the areas currently listed. The clarification for Irish Canyon is not needed, as the management plan, surveys, and monitoring could be limited to the ACEC, or address resources beyond the ACEC boundary. Additionally, Irish Canyon is not designated as an ACEC in each alterative.
Cultural and Heritage Resources	Henry Keesling	Undertake and provide in this document a complete analysis, using current BLM Colorado NEPA/Section 106 cultural resource impact analysis of the proposed South Sand Wash OHV Play Area and OPEN areas. This would include a transportation development plan for the area, a cultural Class III survey, data analysis, reports,	BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for

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		mitigation, and Native American Consultation. Provide an OHV play area Activity Plan detailing all necessary staff, including recreation and LEOs, that are required to be in place. In addition provide a narrative for budget funding needed to mitigate future resource impacts, future cultural impacts, and future management for the life of this project. If OPEN areas are going to be designated this has to be done for them as well. Discuss what the costs of this project will be.	Off-Highway Vehicle Designation and Travel Management). These documents identify inventory requirements, define the area of potential effect (APE), outline compliance with Section 106 when considering comprehensive travel and transportation management planning, and addresses monitoring requirements. BLM will comply with the direction in these documents during formal consultation with SHPO and future route designations. In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the Record of Decision is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the Record of Decision. Based on consultation efforts with SHPO there was a change in the approach noted in Draft RMP/EIS. In the Draft there was no management recourse if a cultural inventory was not completed for the open areas. Based on an agreement with the SHPO developed during consultation efforts, those portions of the open area that are not inventoried within five years of completion of the RMP will be closed. This change in language was added to the Proposed RMP/Final EIS. Regarding the OHV play area Activity Plan, the level of detail requested by the commenter is much more site-specific than is required for the RMP level. There will be additional activity level planning associated with the South Sand Wash SRMA and the cultural resource management plan for the Sand Wash Basin area where issues of this level will be considered and analyzed, as appropriate.
Cultural and Heritage	Henry Keesling	As in the following Paleontological Resources section, all existing cultural/paleontological procedures, Standard Stipulations etc.	The purpose for the standard discovery stipulation in the paleontological section and not in the cultural

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Resources		should be cited and provided in the document. Discussions of partial or incomplete or misleading interpretations of these procedures will not help. Further, as the cultural program and understanding of "archeology" progress, these understandings will change. Statements in the DRAFT RMP need to allow for this change to happen as needed over time.	section is because there is no set policy standard for paleontological resources. Because there are set standards for cultural resources in BLM manuals and handbooks there is no need to restate them in the RMP. They will be able to be implemented whether or not they are noted in the RMP. The change of understanding related to policy issues is one of the reasons the policy- and administrative-type decisions are not included in the RMP, in addition to the fact that they have already gone through a public process and do not need to go through the RMP's NEPA review in order to be implemented.
Cultural and Heritage Resources	Henry Keesling	p. 2-152, Alternative C: Please add in the cultural values here as well. The Cross Mountain rock art/rock shelter complex is very important to the contributing values of the WSA.	The language in the Draft RMP/EIS is in relation to what values would meet relevance and importance criteria for the ACEC, if Congress releases the Cross Mountain WSA from wilderness study. While there may be important cultural resources within the WSA, if they do not meet the specific relevance and importance criteria, they cannot be included as one of the values for which the ACEC would be designated.
Cultural and Heritage Resources	Henry Keesling	p. 2-212, Adaptive OHV Designations: The transportation planning proposed here should be carried out in conjunction with the NEPA EA documents and Section 106 process that should take place before the areas, Zone 1 and 2, are opened up for this activity. Cultural resource management and Section 106 process is not an "adaptive management" process. Appendix F, Criteria for Subsequent Activity Planning, is referred to here. It was not referred to at p2-34. Appendix F, Table F-l Data Collection and Monitoring, makes no reference to cultural resources. Is this an oversight in the document or has LSFO BLM written off cultural resources and its stewardship obligations altogether at this point? See other comment and Executive Summary.	The adaptive management element of travel management planning has been removed in the Proposed RMP/Final EIS to conform to recent Colorado policy. BLM will initiate travel management planning for all areas of the field office after the Record of Decision is signed. BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). These documents identify inventory requirements, define the area of potential effect (APE), outline compliance with Section 106 when considering comprehensive travel and transportation management planning, and address monitoring requirements.
Cultural and Heritage	Henry Keesling	p. 2-220, Cultural Resources Impacts from OHV: Management. Please make clear what is being discussed here. Are these acres just OPEN areas or do they include the south Sand Wash OHV play	Draft RMP/EIS Table 2-47 summarizes the impacts that are identified in more detail in chapter 4. Chapter 4 clarifies that the number of sites presented are

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Resources		areas as well. In any case make a clear statement as to which acres are which. The discussion here is the only place in the document that has data presented. Why is it not presented in other areas of the document? The cultural resource data represents the known sites in the area or is this a projected number? Please make this clear. Further, Native American Consultation has not been carried out. It is unclear what percent figures mean.	estimated from the sensitivity models prepared in conjunction with the Class I Inventory completed for this RMP effort. In relation to whether this presents impacts from the “open” area or the “play” area, the commenter seems to be mixing terms that mean the same thing in regards to on-the-ground OHV management. To reduce this confusion, the term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Concerning consultation efforts with Native American tribes, BLM recognizes consultation has not concluded. As the Proposed RMP solidifies in the Final EIS, consultation can move from discussions of conceptual issues to consultation on actual proposed decisions. Since the Draft RMP/EIS has been published, BLM has offered in-person visits to the Tribal Business Council of the Southern Ute, Ute Mountain Ute, Eastern Shoshone, and the Uintah-Ouray Ute Tribe. The only response was from the Uintah-Ouray Ute Tribe, and the Field Office Manager presented the Draft RMP/EIS to them in a February 2007 Tribal Business Council meeting. In addition, the field office archaeologist has met face-to-face with Eastern Shoshone, Northern Ute, and Ute Mountain Ute representatives to discuss the Draft RMP/EIS. A summary of all consultation efforts with Native American Tribes has been updated in chapter 5 of the Proposed RMP/Final EIS. BLM will finalize consultation efforts with affected tribes prior to signing the Record of Decision.
Cultural and Heritage Resources	Henry Keesling	p. 4-108, Third paragraph. Cite vol2-2 pK-1 Appendix K: Please explain rationale for these statements. Use allocation is an administrative determination based upon various criteria. This in no way protects cultural resources "before threats could occur". Use allocations determination layered upon the National Register of Historic Places criteria only provide additional reasons to fund "protection" for a cultural resource. This does not protect a cultural resource "before threats could occur."	Chapter 2 includes a reference to Appendix K, and there is no need to repeat it here. Site use allocations, as described in BLM-M-8110, “establish what needs to be protected, and when or how use should be authorized.” The manual describes the advantage in doing this is that “it allows Field Office Managers to know in advance how to respond to conflicts that arise between specific cultural resources and other land uses.” Hence, the impact analysis is worded as it was in the Draft RMP/EIS.
Cultural and	Henry Keesling	p. 4-108, p. 4-109: The narrative discussion indicates the known	The Draft RMP/EIS analysis that managing areas as

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Heritage Resources		cultural resources present. Please use the method found in LSRA RMP Appendix 21 [of the 1986 Draft RMP] to provide the number of expected cultural resources in the OHV play area and in other areas that will be "open". Make an effort here to discuss the other "OPEN" areas. See other comments about OPEN areas. Understand that these areas will be used as OHV play areas as well. They will receive none of the discussed recreation program planning, transportation planning or attempted management efforts. Please make this clear and provide all data for Alternative C vs. the other alternatives. The narrative and the table should discuss and display the same topics.	“open to OHV use could result in the damage or destruction of up to 175 cultural resources sites eligible for the NRHP” does not identify the number of known cultural resources, but the number of estimated sites based on the sensitivity level analysis. The Proposed RMP/Final EIS was revised to reflect more recent inventories, resulting in the identification of both known sites (29 known, 4 of which are eligible) and estimated undiscovered sites (157 eligible for the NRHP). Under Alternative C, there are no other areas open to cross-country OHV use. This analysis approach was applied for all the alternatives, addressing impacts to the open OHV areas as the largest potential for significant cultural impacts. Alternative C states that South Sand Wash SRMA, including the open area, will undergo activity-level recreation management planning. Additionally, Appendix F states that the Sand Wash area will be the first to go through comprehensive transportation planning.
Cultural and Heritage Resources	Henry Keesling	Table 4-28: Which is Alternative C and which is Alternative A? Redo the table in light of the above comments.	Table 4-28 does not present both Alternatives C and A, but the acreages for Alternative C, then the acres and percent difference from Alternative A. This is specifically identified in the left column, noting changes “…from Alternative A.” The tables were updated to reflect any changes in acreages between the Draft RMP/EIS and the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Henry Keesling	p. 4-109: The narrative, first paragraph, needs to be clear as to what it is being discussed. Please understand and note that cultural resource inventories and use allocation designations do not cause "impacts". What impacts are being discussed here? Please display the cultural site analysis of existing data and projected data, the numbers of cultural resource sites, and the number of acres that the OHV play area and OPEN areas will include. Discussions of the other alternatives as having less or more of an impact on cultural resources is needed.	The commenter seems to be interpreting the word "impact" as a negative result, assuming a negative connotation. As noted in the Draft RMP/EIS chapter 4 page 4-2, “impacts could be perceived as beneficial (positive) or adverse (negative) by different readers.” Therefore, cultural actions from chapter 2 that include site use allocation and prioritization for resource management plans, inventories, monitoring, etc. would have an impact that would result in identifying and thereby extending protection to more cultural resources sites, as already noted in chapter 4 of the Draft RMP/EIS.
Cultural and Heritage	Henry Keesling	p. 4-109: The last paragraph; why is this discussed? Why is it not in the table?	It is discussed for consistency and comparison between all the alternatives. In addition, these acreages and comparisons to Alternative A are

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Resources			included in Draft RMP/EIS Table 4-29.
Cultural and Heritage Resources	Henry Keesling	Route proliferation outside of the established OHV play area and OPEN areas is a problem. The narrative does not fully or clearly provide information as to what will be done. South Sand Wash area is the 20 year old example of route proliferation. The discussion on route proliferation needs some clear thought. If LSFO cannot stop route proliferation in any areas of the Field Office, what will be the outcome of these proposed DRAFT management practices? Is the entire LSFO management area going to be impacted by route proliferation? Provide a narrative that adequately, addresses this issue.	The purpose of chapter 4 is not to propose solutions to impacts, but to present the analysis of the impacts associated with the chapter 2 alternatives. Route proliferation is analyzed in the Draft RMP/EIS, page 4-105. As noted in the Draft RMP/EIS, proliferation (off-road travel) would occur “without sufficient law enforcement…” Based on this analysis, the degree of proliferation would be related to the sufficiency of law enforcement. The amount and location of law enforcement is related to budgets and staffing levels. Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the field office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.
Cultural and Heritage Resources	Henry Keesling	p. 4-145 4.4 IMPACTS TO RESOURCE USES: First paragraph: Concerning the provided statement, "...management actions for other resource and resource use programs", why is there no cultural resource program discussion in this section? Please explain. Cultural resource program is all about "use". Refer to Section 110 and see Appendix K.)	In the BLM planning handbook (BLM-H-1601-1), cultural resources are considered a resource. Resources can be used through the prescriptions identified in chapter 2. For example, rangeland vegetation is a resource, livestock grazing uses that resource. In addition, chapter 4 is structured to present impacts FROM chapter 2 decisions TO a given resource or use. Therefore, Section 4.3.9 presents the impacts of the various chapter 2 alternative decisions on cultural resources sites, landscapes, etc. While site use allocations are technically a determination of how the cultural resource will be used/managed, it is still considered a tool in managing the cultural resource.
Cultural and Heritage Resources	Henry Keesling	p. 4-234: Why is there no discussion of the number of known eligible to the National Register Historic Places (NRHP) cultural resources that are located in the Alternative C proposed OHV play area and in the OPEN designation areas? Why is there no discussion for these areas that deal with the projected number of cultural resources? The Cumulative Impact Assessment Area, CIAA, analysis should state that, without following current established NEPA and SECTION 106 processes, this number of significant cultural resources will be adversely impacted.	The open OHV areas are all located on BLM-administered lands. Impacts to those areas, including the estimated number of NHPA eligible sites, are identified in Section 4.3.9. This section states that for Alternative C, there are four recorded eligible or needs data sites and an estimated 157 eligible sites could be impacted within the proposed open area. The cumulative section addresses impacts from reasonably foreseeable future actions that were not already analyzed in the front portions of chapter 4. BLM will comply with its Section 106 responsibilities

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			related to transportation decisions as directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the Record of Decision is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the Record of Decision.
Cultural and Heritage Resources	Henry Keesling	p4-234: Third paragraph: The discussion here is that all BLM authorized projects, BLM initiated or industry proposed, go through the same existing, current BLM Colorado NEPA EA process, and Section 106, Native American Consultation process that identifies and protects cultural resources up front prior to the proposed project being authorized, (Protocol 1998). Further, this existing process results in no cumulative impacts to cultural resources. The existing process is the process that must be followed for all BLM proposed projects. However; this is not the process discussed in the DRAFT RMP for the OHV play area and OPEN areas. The proposed new process will cause irreversible, irretrievable, cumulative impacts to known and yet-to-be recorded NRHP eligible sites and significant data loss. This is not discussed in the DRAFT. Provide a narrative that addresses the Cumulative Impact Assessment Area for the new proposed, after-the-fact analysis and mitigation for the recreation program's OHV play area and OPEN area designations. The cultural resource impacts resulting from that proposed action must be analyzed and the results presented in this document. All seven critical elements that an EA analysis would cover must be evaluated for those proposed areas as well	The open OHV areas are all located on BLM-administered lands. Impacts to those areas, including the estimated number of NHPA eligible sites, are identified Section 4.3.9. The cumulative section addresses impacts from reasonably foreseeable future actions that were not already analyzed in the front portions of chapter 4. Potential impacts to cultural resources in the South Sand Wash area (for the Proposed RMP in Section 4.3.9.3) have been updated to reflect the revised size of the South Sand Wash SRMA, as well as more recent cultural resource inventories. An analysis of the impacts of OHV use on cultural resources is included in chapter 4 of the Draft EIS, including estimating the number of sites that could be damaged by “open” OHV use based on the cultural sensitivity maps (maps 3-23 and 3-24), ranging from 9,347 estimated sites under Alternative B to 157 estimated sites under Alternative C to 0 sites under Alternative D. This analysis included an analysis of impacts on all the "critical elements" identified in BLM's NEPA handbook and regulations. BLM will comply with its Section 106 responsibilities related to transportation decisions as

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			directed by the NHPA regulations, language in Addendum 1 to the Colorado Protocol and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). In relation to consultation with the SPHO regarding transportation issues, the SHPO was provided a review of, and commented on the Draft RMP/EIS. This review resulted in specific concerns about the proposed Sand Wash open OHV area. BLM and the SHPO visited the South Sand Wash area in September 2007 to review the on-the-ground issues and to discuss potential resolution. Formal consultation with the SHPO was initiated when the Proposed RMP was finalized, and this consultation effort will be completed before the Record of Decision is signed. The consultation with the SHPO on the South Sand Wash Area will be executed in a Memorandum of Agreement prior to signing the Record of Decision.
Cultural and Heritage Resources	Henry Keesling	P4-243 4.9 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES AND LONG-TERM PRODUCTIVITY: There is no discussion of cultural resources here. Suggest that Short-term use, resulting from the 5 year after-the-fact OHV play area planning and OPEN areas non-planning, will allow significant damage to hundreds of known cultural resources eligible to the National Register of Historic Places. This impact will not be mitigated. Also, these significant cultural resources will not be able to provide the needed data nor enjoyment for future generations, thus a loss of long-term productivity. This is true for unidentified cultural resources in both the OHV play area and the OPEN areas. Cultural resources are a non-renewable resource. Once destroyed they are gone.	See General Comment Response #47
Cultural and Heritage Resources	Moffat County Commissioners	p. 1-13 Cultural and Heritage Resources. In the third paragraph discussing Section 106 of the National Historic Preservation Act (NHPA), Moffat County requests the RMP acknowledge that Section 106 also allows for consultation with local governments, which Moffat County has requested during undertakings with local significance. The paragraph makes the NHPA appear as if it is solely a federal government process, yet significant local governmental involvement is also warranted.	36 CFR 800.2 (c)(3) provides local governments with the opportunity to request consulting party status during the Section 106 process. This opportunity will exist regardless of the RMP decisions, therefore it does not need to be repeated to grant such an opportunity.
Cultural and Heritage	Moffat County Commissioners	p. 2-32 Cultural Resources: 1) Moffat County requests it be clarified in the Cultural Resource Goals to 'consult with local governments during federal undertakings.' This is especially necessary since	36 CFR 800.2 (c)(3) provides local governments with the opportunity to request consulting party status during the Section 106 process. This opportunity will

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Resources		cultural undertakings will directly impact land uses that make up the County's Custom and Culture.	exist regardless of the RMP decisions, therefore it does not need to be repeated to grant such an opportunity.
Cultural and Heritage Resources	Moffat County Commissioners	p. 2-32 Cultural Resources: 2) Moffat County also requests a strategy be listed to conduct research and archeological modeling projects to provide for resource identification that would allow clearances for repetitive findings such as arrowheads, flint chips, etc. The intent with this request is to prevent repetitive findings from preventing or rerouting land uses, especially when those findings are not culturally significant.	BLM is required to comply with Section 106, Addendum 1 to the Colorado Protocol Agreement, and BLM Manual 8110 when inventorying for cultural resources.
Cultural and Heritage Resources	Vermillion Ranch Limited Partnership	Pg ES-10 Cultural resources should create modeling program to predict where cultural resources are probable and in consultation with Moffat county determine which resources are warrant protection through a section 106,and change from avoidance as principle action	The BLM is required to comply with Section 106, Addendum 1, to the Colorado Protocol Agreement and BLM Manual 8110 when inventorying for cultural resources.
Cultural and Heritage Resources	Vermillion Ranch Limited Partnership	Pg. 2.5.9.2 Cultural resources and Management actions must include consultation with county and minimization of impacts on grazing. I.e. grazing has been here 120+ years, so no disturbance to archeology should be the determination since you can still find the stuff.	Compliance with Section 106 in relation to livestock grazing management actions will comply with IM-CO-2006-029, Interim Historic Preservation Guidelines and Procedures for Evaluating the Effect of Rangeland Management Activities on Historic Properties, as well as any completed guidelines following formal consultation. Consultation with counties and permittees would occur during public processes associated with NEPA and Section 106 regulations.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	A. BLM has not completed an adequate inventory of cultural resources or analysis of potential impacts to cultural resources from management alternatives. As a result, BLM has not developed sufficient protective measures and management decisions in the Draft RMP cannot be supported. NEPA requires that BLM establish a baseline of the existence and condition of cultural resources, so that the agency can assess the potential direct, indirect and cumulative impacts of management decisions. 40 C.F.R. § 1502.15. The National Historic Preservation Act (NHPA) also requires that the agency inventory cultural resources in order to assess the potential impacts of proposed actions, such as route designations, and to develop measures to avoid, minimize, or mitigate any adverse effects on historic properties. 16 U.S.C. § 470f; 36 C.F.R. §§ 800.4, 800.6. However, while BLM acknowledges that there is a high potential for additional cultural resources to be found, only a very small percentage of the	See General Comment Response #39

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		planning area has been inventoried to date and BLM relies upon this lack of information to limit the analysis of impacts from other management decision. Draft RMP, pp. 4-103 - 4-104. BLM nonetheless proceeds with decisions such as designating the Sand Wash areas as an open ORV "play area" and making all of Vermillion Basin available for oil and gas leasing. Because BLM has not identified the cultural resources, it cannot analyze the potential impacts of the various management decisions on cultural resources.	
Cultural and Heritage Resources	Wilderness Society (The), et. al.	BLM defers to later NHPA inventories and avoidance of cultural sites to support its conclusion that the RMP will result in no significant impacts to cultural resources. Draft RMP, p. 4-104. This approach violates NEPA, because additional impacts to unknown sites and indirect or cumulative impacts to known and unknown sites in the area of a project are foreseeable and could be avoided or mitigated. Similarly, this approach violates the NHPA by ignoring potential adverse effects on sites and their location, setting, and design, as well as ways to avoid them. 36 C.F.R. §§ 800.5, 800.6. In fact, the Draft RMP does not acknowledge the cumulative impacts of large-scale energy development, which can adversely affect site setting and integrity, even if known sites are avoided.	In association with the RMP revision, BLM completed a Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP. This report was based on the best available information and is a result of Section 106 and 110 inventories of the area and represents the volume of information available. This data was used during the alternative development and analysis process, and forms the basis for the cultural resources analysis. Even with this existing data, BLM concurs that there could be additional impacts to unknown cultural resource sites, and notes such impacts in the Draft RMP/EIS on page 4-104. Additionally, language has been added to the Proposed RMP/Final EIS to identify the potential for impacts to the settings associated with cultural sites. This is wholly consistent with NEPA, identifying the potential impacts associated with each alternative for the decision-maker to consider when selecting management for the Final RMP. In relation to a violation of NHPA, the commenter's opinion is contrary to an IBLA decision that notes that a "phased approach to Section 106 compliance, in accordance with 36 CFR 800.4(b)(2) and 36 CFR 800.5(a)(3), has been endorsed by the courts in circumstances where no surface-disturbing activity is to occur until the Section 106 process is completed" (164 IBLA at 354-55). IBLA further explains that throughout the planning process, "the agencies continually narrow their focus, from the large land areas potentially subject to oil and leasing to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities. Such an approach allows for identification, consideration, and mitigation of adverse effects on cultural

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			resources at each phase of the oil and gas decision-making process" (164 IBLA at 357-58). They conclude by noting that such a process ensures that "cultural resources which might be identified during the APD approval process could…be adequately protected under the stipulations incorporated in the leases, or by modifying the siting or design of drilling and other facilities or the timing of operations, or by undertaking other 'reasonable measures,' pursuant to 43 CFR 3101.1-2" (164 IBLA at 357-58).
Cultural and Heritage Resources	Wilderness Society (The), et. al.	Recommendations: BLM should commit to inventorying cultural resources in the Little Snake Resource Area. Waiting to inventory until a project is proposed results in limited additional information, while ignoring the potentially larger context of additional sites and their setting. Areas at most risk from damaging activities should be prioritized. Inventories should be completed and a thorough NEPA analysis so that BLM can make informed decisions and avoid or mitigate adverse effects, as required by the NHPA. The Draft RMP should acknowledge the range of direct, indirect and cumulative effects that may arise from management decisions, especially large-scale energy development, and provide measures to avoid, minimize and mitigate those impacts.	BLM understands its Section 110 responsibilities and seeks to perform Section 110 inventories as staffing and budget allows. The Draft RMP/EIS already includes language identifying "at risk" areas, as well as priority areas for cultural resource surveys. However, a land use plan decision is not required to perform Section 110 inventories. Additionally, any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. As with the impact analysis in this NEPA process, analysis associated with future activities will use the best available information, including data from all completed cultural resource inventories. The best available data was used during the alternative development and analysis process for the Draft RMP/EIS. Even with this existing data, BLM concurs that there could be additional impacts to unknown cultural resource sites, and notes such impacts in the Draft RMP/EIS on page 4-104. Additionally, language has been added to the Proposed RMP/Final EIS to identify the potential for impacts to the settings associated with cultural sites. This is wholly consistent with NEPA, identifying the potential impacts associated with each alternative for the decision-maker to consider when selecting management for the Final RMP.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	Prior to designating areas or routes open to ORV travel or permitting large-scale energy development, BLM should commit to inventorying cultural resources, evaluating sites and mitigating potential effects.	BLM's policy is to fully protect cultural resources. Protection is accomplished by considering direct, indirect, and cumulative effects, and developing mitigation actions to address adverse effects based on the best information available. In general, BLM's

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			preferred method of mitigation is site avoidance, and this is accomplished through a phased approach to Section 106 compliance, where BLM continually narrows its focus, from the large land areas potentially subject to oil and leasing to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities. Such an approach allows for identification, consideration, and mitigation of adverse effects on cultural resources at each phase of the decision-making process, including large-scale energy developments. Regarding inventories related to designating areas or routes open to OHV use, BLM will comply with its Section 106 responsibilities related to transportation decisions as directed by the NHPA regulations, Addendum 1 to the Colorado Protocol, and BLM IM-2007-030 (Clarification of Cultural Resource Considerations for Off-Highway Vehicle Designation and Travel Management). These documents identify inventory requirements, define the area of potential effect (APE), outline compliance with Section 106 when considering comprehensive travel and transportation management planning, and address monitoring requirements. It should be noted that no routes are being proposed for designation in the Draft RMP/EIS or the Proposed RMP/Final EIS.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	1. The RMP does not give sufficient priority to cultural resources in management decisions. As discussed above, FLPMA permits BLM to manage the public lands such that not all uses are permitted in all places. Further, Section 106 of the NHPA imposes obligations on the BLM to prioritize identification and protection of cultural resources; Section 110 obligates the BLM to proactively identify and evaluate sites that may be eligible for listing on the National Register. 16 U.S.C. §§ 470f, 470h. However, the Draft RMP does not even include protection of cultural resources in discussing the risks from energy development and roads, the potential benefits from special management areas, and the socioeconomic values of the region. Draft RMP, Planning Issues, pp. 1-5 – 1-10. Based on the impressive and important cultural resources in the Little Snake Resource Area, BLM should manage other activities on the public lands to minimize risks to cultural resources.	One of the goals in the Draft RMP/EIS is to “preserve and protect significant cultural resources and ensure these remain available for appropriate uses by both future and present generation…” (Draft RMP/EIS page 4-32). Cultural resources were considered among the many multiple resources and uses for which management alternatives were developed. Management alternatives were developed to assist in the protection of cultural resources, including the identification of “at risk” areas, as well as prioritizing areas for cultural resource surveys, monitoring efforts, and nomination to the National Register of Historic Places. These lists were reviewed and modified in the Proposed RMP/Final EIS to best address the RMP’s goals and objectives. Further protection of cultural resources was accomplished by

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		Recommendations: In general, the Proposed RMP should identify protection of cultural resources as a priority, both in decisions to permit potentially damaging activities and in decisions to protect sensitive areas for other natural resources that may also benefit cultural resources. BLM should acknowledge the existence of important cultural resources in Vermillion Basin, Dinosaur North, Cold Springs Mountain and Irish Canyon and prioritize these areas for further inventory and immediate protection.	considering direct, indirect, and cumulative effects, and during implementation, development of mitigation actions to address adverse effects based on the best information available. In general, BLM's preferred method of mitigation is site avoidance, and this is accomplished through a phased approach to Section 106 compliance, where BLM continually narrows its focus, from the large land areas potentially subject to oil and leasing to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities. Such an approach allows for identification, consideration, and mitigation of adverse effects on cultural resources at each phase of the decision-making process. Regarding the issues identified in Section 1.5.1 of the Draft RMP/EIS, these are the broad issues that were most raised during the scoping process. The absence of any issues, including cultural resources, in no way diminishes the legal responsibility toward or importance of the issue. The Scoping Report notes that 4.2% of all comments were related to cultural resource issues. While each issue and sub-issue could have been identified in chapter 1, including or excluding them does not negate their importance, just the level of public input during the public scoping period, which is exactly what public scoping is supposed to do, as defined by the CEQ NEPA regulations. That said, the language was revised in the Proposed RMP/Final EIS to include mentioning cultural resources as a sub-issue under Issue 3: Transportation and Travel Management.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	Areas where cultural resources are known or likely to occur should not be open to cross-country ORV use. Areas with high densities of cultural resources should be closed to ORVs. In other areas with cultural resources, ORVs should be limited to designated routes after an inventory to determine appropriate locations and conditions. This is also consistent with BLM’s regulations regarding location of areas and routes for ORVs. 43 C.F.R. § 8342.1	See General Comment Response #46
Cultural and Heritage Resources	Wilderness Society (The), et. al.	Areas where high densities of cultural resources are known or likely to occur should not be open to oil and gas development, or should include non-waivable NSO stipulations. In other areas with cultural resources, location of development should be limited based on an	BLM's policy is to fully protect cultural resources. Protection is accomplished largely through avoiding disturbing sites, which is BLM's preferred method of mitigation. Avoidance of cultural resource sites is

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		inventory to determine appropriate locations and conditions.	dependent on accurate cultural resource site inventories. In association with the RMP revision, BLM completed a Regional Class I Overview of Cultural Resources for the BLM Little Snake RMP. This report was based on the best available information and is a result of Section 106 and 110 inventories of the area and represents the volume of information available. This data was used during the alternative development and analysis process, and forms the basis for the cultural resources analysis. Cultural resource inventories will continue to be completed, both under Section 110 and Section 106 authorities. Recent IBLA decisions note that a "phased approach to Section 106 compliance, in accordance with 36 CFR 800.4(b)(2) and 36 CFR 800.5(a)(3), has been endorsed by the courts in circumstances where no surface-disturbing activity is to occur until the Section 106 process is completed" (164 IBLA at 354-55). IBLA further explains that throughout the planning process, "the agencies continually narrow their focus, from the large land areas potentially subject to oil and leasing to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities. Such an approach allows for identification, consideration, and mitigation of adverse effects on cultural resources at each phase of the oil and gas decision-making process" (164 IBLA at 357-58). They conclude by noting that such a process ensures that "cultural resources which might be identified during the APD approval process could…be adequately protected under the stipulations incorporated in the leases, or by modifying the siting or design of drilling and other facilities or the timing of operations, or by undertaking other 'reasonable measures,' pursuant to 43 CFR 3101.1-2" (164 IBLA at 357-58). BLM has developed management alternatives to protect areas with especially sensitive cultural resources. Additional inventories will be conducted to ensure the additional sites are identified and avoided. The impacts of this approach are identified in the Draft RMP/EIS and have expanded in the Proposed RMP/Final EIS.

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Cultural and Heritage Resources	Wilderness Society (The), et. al.	BLM should inventory the Little Snake Resources Area for sites that may be eligible for the National Register and pursue nominations and recognition for historic properties and archaeological districts.	Until 1980, Section 106 of the NHPA required agencies to consider the effects of their undertakings only on properties listed on the National Register of Historic Places. However in 1980, Section 106 was amended to require agencies to consider an undertaking's effects on properties included in or eligible for inclusion in the National Register. Since that time BLM has outlined specific management prescriptions and mitigation measures to protect sites both listed and eligible for the National Register. Any potential surface disturbing activities based on future proposals will require compliance with Section 106 and site-specific NEPA documentation. Additionally, the Draft RMP/EIS identifies areas that would receive priority for Section 110 inventories (page 2-33). A component of these cultural resource inventories is a preliminary determination of eligibility for the National Register of Historic Places. According to BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register is not a land use planning decision and is therefore outside the scope of this EIS.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	2. The Draft RMP does not comply with IM 2007-030 regarding protection of cultural resources in travel management. Instruction Memorandum (IM) No. 2007-030, which was issued and became effective on December 15, 2006, addresses "Cultural Resource Considerations for Off-Highway Vehicle (OHV) Designation and Travel Management." IM 2007-030 acknowledges the "overall beneficial effect of route designations on cultural resources." The IM includes a broad recognition of the benefits to other resources from controlling motorized access, stating: "Sensitive resource areas may be protected through rerouting, reconstruction, and new construction, limitations on vehicle type and time or season of travel, in addition to closure." Further, in providing direction on developing management, the IM notes that: "Selection of specific road and trail networks and imposition of other use limitations should avoid impacts on historic properties wherever possible" and requires that "existing cultural information must be considered." As discussed in the comments of the Colorado Plateau Archaeological Alliance, BLM has sufficient important information available to indicate areas that should be protected (such as Vermillion Basin). Nonetheless, the Draft RMP	See General Comment Response #46

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		declines to make decisions to protect these areas. As mandated by IM 007-030: "Evaluation of routes or areas to be designated as closed to protect cultural resources may be based on existing inventory information and should not be postponed until additional information is acquired." (emphasis added). Recommendations: The RMP should specifically acknowledge the benefits to sensitive resources, including cultural resources, from closing areas to motorized use or otherwise limiting access. In setting out criteria for comprehensive travel management planning, the RMP should not delay closures and other designations to protect cultural and other sensitive resources from the damage associated with motorized access, and should adopt a more restrictive travel network to address these concerns.	
Cultural and Heritage Resources	Wilderness Society (The), et. al.	1. The resources in Vermillion Basin, Cold Springs Mountain and Irish Canyon evidence a regional movement of prehistoric peoples and should be managed as part of an archaeological district to enhance inventory, protection and research. The cultural resources in Vermillion Basin are nationally significant and have importance in relation to other sites in the surrounding areas. As noted in the comments of the Colorado Plateau Archaeological Alliance, a National Register nomination for rock art sites in the Vermillion Basin was initiated several years ago. These comments also discuss the 5 archaeological sites with 39 distinct rock art panels and associated features found in Irish and Vermillion Canyons, which can yield information important in prehistory and history, including the development and demise of northern Fremont culture, the arrival and interface of Ute and Eastern Shoshone populations, and Euroamerican exploration and settlement. Further, these sites relate to sites in Irish Canyon, Cold Springs Mountain and Brown's Park, showing a movement of peoples and ideas from north to south, south to north, and along tributaries of the Green River throughout various periods of time. Overall, the expert comments acknowledge "the importance of the Vermillion Basin to an understanding of Fremont culture interactions with ancestral Plains peoples," which requires that "the entire Vermillion Basin should be subjected to an intensive Class III survey to determine the nature and extent of Fremont adaptations, and to assist the BLM in its efforts to mitigate direct and indirect adverse effects to these resources." The Colorado Plateau Archaeological Alliance expects that further study will document Fremont villages and farmsteads focused on maize horticulture in the Little Snake Resource Area. The nomination of the Vermillion Basin as a National Register	In preparing the Draft RMP/EIS, BLM used the best available information to form the basis for the cultural resources decisions and analysis. These baseline data are a result of Section 106 and 110 inventories of the area and represents the volume of information available. These data were also used to develop sensitivity models to develop maps that identify the potential of an area to contain cultural resources based on what is already known. In this manner, BLM has considered both documented cultural resource sites and the relative potential for an area to contain additional, currently unidentified sites. In addition to the known sites, BLM seeks to perform Section 110 inventories as staffing and budget allows. The Draft RMP/EIS includes language identifying "at risk" areas, as well as prioritizing areas for cultural resource surveys, monitoring efforts, and nomination to the National Register of Historic Places. These lists were reviewed and modified in the Proposed RMP/Final EIS to best address the RMP's goals and objectives. Beyond these proactive inventories, any potential surface disturbing activities based on future proposals will require site-specific inventories in compliance with Section 106 and site-specific NEPA documentation. Through this process, BLM will accomplish a phased approach to Section 106 compliance, where the focus is continually narrowed, from the large land areas potentially subject to activities such as oil and gas or ORV

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		archaeological district should be completed by the BLM and formally submitted to the National Park Service. Given the relationship of sites in the Vermillion Basin to those in Irish Canyon, Cold Springs Mountain and Brown's Park, the BLM should consider an archaeological district that includes nearby archaeological sites. Recommendations: Section 110 of the NHPA obligates BLM to identify sites that may be eligible for the National Register. BLM should actively assess the sites in Vermillion Basin, Irish Canyon, Cold Spring Mountain and surrounding areas as appropriate for nomination of a National Register archaeological district. BLM should also conduct an intensive survey to document the cultural resources, including their setting, and implement management prescriptions to protect them, including closure to oil and gas development, closure to ORVs and exclusion of ROWs.	development to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities. Such an approach allows for identification, consideration, and mitigation of adverse effects on cultural resources at each phase of the decision-making process. In addition, Alternative C (Proposed RMP) management was revised for Vermillion Basin in the Proposed RMP/Final EIS to close the area to oil and gas leasing. This would provide protection and allow for avoidance of cultural resource sites and most of the surrounding landscape. In keeping with the National Programmatic Agreement and the Colorado Protocol Agreement, BLM invites SHPO, the public, governmental and Native American participation in all planning efforts. According to BLM's planning handbook (BLM-H-1601-1), nominating cultural sites to the National Register of Historic Places, whether as an individual site or as a district, is not a land use planning decision and is therefore outside the scope of this EIS.
Cultural and Heritage Resources	Wilderness Society (The), et. al.	2. The 1% surface disturbance limitation for oil and gas development of Vermillion Basin will cause significant impacts to its cultural resources, which should be protected in accordance with FLPMA's multiple use mandate. As discussed in detail previously in these comments and those of the Colorado Plateau Archaeological Alliance, the 1% surface disturbance and rolling reclamation approach to oil and gas development is likely to result in more intensive development in areas of high potential. In addition, energy development requires construction of access roads, which are likely to lead to higher levels of vandalism and degradation. The direct, indirect and cumulative impacts from energy development in Vermillion Basin would likely devastate the cultural resources in the area. Recommendations: The BLM's conclusions that this approach to development of Vermillion Basin will not significantly impact cultural resources cannot be supported. The area should be closed to oil and gas development to protect the cultural resources.	The Proposed RMP/Final EIS has been revised to include analysis of impacts from oil and gas development to the cultural resource setting, as well as impacts from dust along routes. Impacts from vandalism and pot-hunting are already addressed in the Draft RMP/EIS (page 4-105). The actual quantification of such impacts is impossible at this stage, as the location, density, and mileage of the routes will not be known until PODs are developed, at which the appropriate analysis will occur. It is also important to note that the 1% stipulation does not negate BLM's compliance with other cultural resource laws, regulations and policies. It would remain BLM's policy is to fully protect cultural resources, which would largely be accomplished through avoiding disturbing sites, which is BLM's preferred method of mitigation, even in areas of potentially concentrated development. Sites would be avoided following site-specific inventories. Based on the existing data, the cultural resource site

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			densities in Vermillion Basin would not require a complete closure to leasing in order to protect the sites. While the commenter claims the Draft RMP/EIS conclusions cannot be supported, they do not present any substantiated evidence that contradicts what is already presented in the Draft RMP/EIS to support the claim that the 1% management would devastate the cultural resources in Vermillion Basin. Additionally, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS.
Cumulative Impacts	Colorado Wildlife Federation	The draft RMP proposes to “make available the federal coal and oil shale estate for exploration and development” and goes on to designate lands as available for oil shale leasing “consistent with lands available for oil and gas leasing or coal leasing.” It is premature to issue this statement because the process is still underway to enable assessment of “whether current scientific knowledge and expertise will allow commercial development of oil shale.” It follows that the BLM cannot at this time analyze the unique wildlife and potential environmental impacts related to commercial oil shale leasing. The Little Snake RMP should be amended at an appropriate future date after the timing is appropriate to conduct such analysis.	In November 2008, BLM finalized its NEPA document associated with oil shale and tar sands with publication of the Approved RMP Amendments/ROD for Oil Shale and Tar Sands Resources to Address Land Use Allocations in Colorado, Utah, and Wyoming and Final Programmatic Environmental Impact Statement. The PEIS amended 12 BLM land use plans to describe the most geologically prospective areas administered by BLM where oil shale and tar sands resources are present, and to identify areas that will be open to application for commercial leasing, exploration and development. The study area for that process did not include the Little Snake Field Office and the 1989 Little Snake RMP was not addressed or amended. As there are oil shale resources within the RMPPA, the Draft RMP/EIS included decisions to manage those resources. The Proposed RMP/Final EIS was revised to add language to clarify management of oil shale leasing. Specifically, this language notes that BLM will consider leasing oil shale, but that “future oil shale leasing would require additional NEPA analysis, as well as a Plan Amendment. This additional NEPA analysis could preclude development.”
Cumulative Impacts	Environmental Protection Agency (EPA),	The document states that surface disturbing activities, including dispersed recreation, Off Highway Vehicles (OHV) use, mineral and energy development and ROW development, can result in removing	Chapter 4 of the Proposed RMP/Final EIS has been revised to ensure similar impacts from activities are discussed consistently in sections with related

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	Region 8	vegetation and accelerate erosion that could contribute to irreversible soil loss (DEIS page 4-29). EPA recommends that these impacts be more fully disclosed in other areas in the document including the reclamation section, Appendix O. This section should also discuss the fragile nature of the sagebrush ecosystem and the distinct possibility that activities conducted in the RMPPA may result in irreversibly damaging Sage Grouse habitat.	impacts (e.g., soils, water, and vegetation). However, Appendix O is not an effects analysis, so a discussion of impacts in that Appendix is not appropriate. Additionally, page 4-29 of the Draft RMP/EIS does not conclude that such activities would contribute to “irreversible soil loss” as noted in the comment. Irreversible impacts are described in Section 4.7 of the Draft RMP/EIS. This section has been revised to more specifically identify irreversible impacts, as well as to differentiate the levels of irreversible impacts between the various alternatives.
Cumulative Impacts	Rick Hammel	BLM must start a program where a cumulative impacts analysis of all development or uses is done every five years and more frequently in the sagebrush patches described on Map 2-4. We are particularly concerned about patches 2, 3 and 6 numbering from the top east.	There is no legal requirement to perform cumulative impacts analysis on a regular schedule with no affiliation with any proposed project. Establishing such a program is beyond the scope of a land-use planning document. However, NEPA requires that the impact analysis associated with every NEPA project address the potential for cumulative impacts, especially in EAs and EISs. BLM will continue to comply with such requirements. In addition, monitoring and data gathering efforts will continue, as described in Appendix F, which will assist the evaluation of the RMP decisions.
Cumulative Impacts	Moffat County Commissioners	p. 4-236 Livestock Cumulative Impact: Moffat County requests BLM describe the impact of the loss of open space if ranches are reduced.	Chapter 3 of the Draft RMP/EIS includes that Routt County residents are concerned about the potential conversion of privately held farms and ranches into residential properties. However, none of the alternatives in the Draft RMP/EIS propose to reduce ranches or propose to reduce permitted livestock use (Section 2.6.2). The impact analysis notes that due to reduced AUMs related to oil and gas drilling, Alternative A would result in a loss of 244 cattle and 49 sheep. Based on the socioeconomic analysis, while the number of ranches selling cattle and sheep has declined, the number of cattle and sheep produced by ranches has increased. This indicates a consolidation of ranches into fewer, but larger ranches rather than a conversion of ranchland into subdeveloped ranchettes. In addition, because of vegetation treatments, the impact analysis concludes that all the action alternatives “would lead to increased availability of forage and more

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			opportunities for livestock grazing." While BLM acknowledges such conversions occurs in western communities, based on the existing trends in the agricultural sector and anticipated impacts from the proposed alternatives and reasonably foreseeable activities, there is no evidence that would lead BLM to conclude that there would be conversion in land-status as a result of actions proposed in the alternatives.
Cumulative Impacts	National Park Service	As always, the National Park Service (NPS) is concerned with the potential of oil and gas development in close proximity to the boundary of the Monument. Alternative C provides the best fit where BLM and NPS lands meet in regards to issues of the impact of oil and gas development and the impacts to Monument resources. In the locations where oil and gas development are adjacent to the Monument boundaries, we would like to work with you to minimize impacts.	BLM is required by FLPMA to coordinate the land use inventory, planning and management of public lands with the land use planning and management programs of other Federal departments and agencies. BLM is also cognizant of being a "good neighbor" and working closely with interested agencies and stakeholders in promoting the use, conservation, and protection of the various public land resources and values.
Cumulative Impacts	Vermillion Ranch Limited Partnership	Pg 4-236 Cumulative Impacts analysis fails to disclose that loss of ranches impacts open space same goes for 4.8 on 4-242	Chapter 3 of the Draft RMP/EIS includes the concern that Routt County residents are concerned about the potential conversion of privately held farms and ranches into residential properties. However, none of the alternatives in the Draft RMP/EIS propose to reduce ranches or propose to reduce permitted livestock use (Section 2.6.2). The impact analysis notes that due to reduced AUMs related to oil and gas drilling, Alternative A would result in a loss of 244 cattle and 49 sheep. Based on the socioeconomic analysis, while the number of ranches selling cattle and sheep has declined, the number of cattle and sheep produced by ranches has increased. This indicates a consolidation of ranches into fewer, but larger ranches rather than a conversion of ranchland into subdeveloped ranchettes. In addition, because of vegetation treatments, the impact analysis concludes that all the action alternatives "would lead to increased availability of forage and more opportunities for livestock grazing." While BLM acknowledges such conversions occurs in western communities, based on the existing trends in the agricultural sector and anticipated impacts from the proposed alternatives

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			and reasonably foreseeable activities, there is no evidence that would lead BLM to conclude that there would be conversion in land-status as a result of actions proposed in the alternatives.
Cumulative Impacts	Wilderness Society (The), et. al.	The Draft RMP should realistically assess the cumulative impacts of oil and gas development: Existing development from neighboring planning areas as well as development within the Field Office affects the planning area. Similarly, although the BLM may not have formal control over adjacent private lands, these lands can also be affected by oil and gas development. The impacts of oil and gas development do not recognize management boundaries. NEPA's definition of cumulative impacts requires the BLM to consider the decisions in this RMP in light of the incremental effects from past, present and reasonably foreseeable future activities on the resources of the Little Snake Resource Area, whether they are taken by this field office, another BLM field office, other agencies or private persons. 40 C.F.R. § 1508.7. Therefore, this RMP must consider the local, regional and even national context of this RMP in addressing issues such as: - the widespread oil and gas development already underway and/or currently being considered for approval in the region; - the regional effects of oil and gas development on air quality; - the dwindling habitat nationwide for sage grouse and the particularly healthy habitat in the Little Snake Resource Area; - Vermillion Basin as the largest unleased block of land in the Little Snake Resource Area; - the spectacular big game habitat and hunting opportunities; - the current lack of protections for wilderness characteristics and primitive, quiet recreation; - the many special status species present in the Little Snake Resource Area; - the degree to which the BLM can improve the chances for survival and even enhancement of many species, both regionally and nationally; - the costs of oil and gas development to other aspects of the local economy. Many of these considerations are discussed in further detail throughout these comments. Recommendations: In evaluating the need and ways to manage	The Draft RMP/EIS includes a cumulative analysis section. It is important to understand that the collection of impacts from past actions are reflected in the existing condition of the various resources, which is described in chapter 3.This addresses the commenter's bullets number 2, 3, 4, 5, and 7. Chapter 2 addresses both the existing management (which partially addresses commenter's bullet #6), as well as a range of alternative management plans. The main body of chapter 4 (Sections 4.3, 4.4, and 4.5) address the impacts from the various alternatives on the resources, as described in chapter 3. This section addresses the impacts described in commenter's bullets number 2, 4, 8 and 9. Finally, Section 4.6 addresses impacts from other, reasonably foreseeable actions beyond those described in chapter 2. This includes minerals and energy activity, pipelines, existing oil and gas developments, and other items identified in Section 4.6.2. Identification of these impacts addresses commenter's bullets number 1 and 2. It is important to note that a cumulative impacts analysis it not the place to assess the condition of the greater sage-grouse across its range, but the impacts of the alternatives, combined with other reasonably foreseeable actions on the resources and uses within a reasonable cumulative impact assessment area. The U.S. Fish and Wildlife Service and state wildlife agencies have the responsibility to assess rangewide impacts to a species. Additionally, cumulative impacts in not the appropriate venue to lobby for protection of certain land use philosophies, but to simply report the impacts of the alternatives and reasonably foreseeable actions on the variety of resources and uses within the Little Snake RMPPA. The cumulative section in the Proposed RMP/Final EIS has been revised to include some additional clarification of impacts.

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		these lands to protect the many resources in the Little Snake Resource Area, BLM 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.	
Cumulative Impacts	Wilderness Society (The), et. al.	Measuring the acres of direct disturbance to wildlife is appropriate and is estimated for the oil and gas development of the alternatives in the Draft RMP. However, little quantitative assessment is made of indirect and cumulative impacts. This important part of the NEPA process is challenging for wildlife because it varies by species and must be measured spatially across a landscape. Fortunately, GIS (geographic information system) technology makes this process much easier. Basic habitat fragmentation measures of roads and oil and gas infrastructure (e.g., road density or distance to road) can be made for a broad landscape, key wildlife habitat area, or management unit. These measures, when combined with the literature discussed in the last section, allows scientists to project likely impacts of general transportation networks, oil and gas development, ORV impacts or other infrastructure development. Examples of this application of GIS for energy development was provided to the Little Snake RMP planning team during the NWCOS process and during this planning process in our reports Fragmenting Our Lands: The Ecological Footprint from Oil and Gas Development (Weller et. al 2002) and Wildlife at a Crossroads: Energy Development in Western Wyoming (Thomson et al. 2005) and also in June 2006 in our paper Analysis of the Little Snake Resource Area “Sage brush Habitat Fragmentation Proposal from the Cooperating Agencies.” Additional reports are included in Appendix 1, attached and discussed below. Also important to developing and evaluating management alternatives are creating oil and gas development infrastructure build-out scenarios for each alternative. Readily available GIS technology can generate GIS data layers for different development scenarios guided by parameters and constraints for development provided in the RFD. This technology was demonstrated in our paper Analysis of the Little Snake Resource Area “Sage brush Habitat Fragmentation Proposal from the Cooperating Agencies.” The Draft RMP states: “based on the reasonably foreseeable oil and gas development scenario for the RMPPA, BLM does not anticipate a large amount of	The Draft RMP/EIS addresses direct and indirect impacts to wildlife from oil and gas development based on the reasonably foreseeable development (RFD) scenario, which identifies estimates for future development by general area. The impact analysis in the Draft RMP/EIS addresses the potential impacts on a resource-by-resource basis based on the decisions in chapter 2 and the RFD. There is insufficient information in either chapter 3 or chapter 2 to perform an analysis at the RMP level of what actual oil and gas development could look like on the ground. Such an analysis attempts to develop hypothetical site-specific impacts before any site-specific proposal have been submitted or proposed. Any “build-out” scenario developed using GIS would simply be one potential development scenario of thousands, with no connection to reality or association with proposed decisions in chapter 2 beyond the assumption that the development scenario assumed would comply with the restrictions described in chapter 2. Thousands of other potential development scenarios could also comply with the same restrictions and look very different. Inclusion of any such analysis in the EIS would not reflect a proposed decision or alternative from chapter 2, and as such, would be inconsistent with NEPA. In Northern Alaska Environmental v Kempthorne (No. 05-35085, D.C. No. CV-04-00006-J-JKS), the Ninth Circuit Court of Appeals affirmed a district court decision that a “resource by resource analysis of the effects of development in [an] overall area to be offered for leasing satisfied the site specific analysis requirement of NEPA.” They also referenced the D.C. circuit in noting that “uncertainty is an inherent problem with multi-stage projects such as oil and gas

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		new development that would lead to unacceptably adverse effects in all areas of the RMPPA." (Draft RMP, p. 2-3) This leaves the door open for substantial, unacceptably adverse effects in portions of the resource area. To demonstrate our concern we completed a build-out scenario of well pads and roads for the preferred alternative (the build-out generates the development described in the RFD which we understand from the Draft RMP is anticipated to be followed under the preferred alternative – all Maps are attached). It uses a CommunityViz extension to the standard ArcGIS software to position well pads on the landscape in the geographic areas and spacing density as defined in the RFD. It also contains constraints from the preferred alternative. We used the results of the oil and gas build-out scenario to assess indirect and cumulative impacts on wildlife. We did this by measuring the habitat fragmentation metrics of route density and distance to route and compared the results with biological studies of road and oil and gas development impacts on specific species. Results show graphically and quantitatively where the development will occur (according to the RFD) allow us to project impacts on wildlife species. Please note the placement of individual wells in the build-out analysis was generated randomly by computer GIS software within geographic constraints from the RFD to achieve the development and well pad spacing defined by the RFD. The build-out should not be construed as a prediction of the exact geographic locations that a company would place roads and wells (based on subsurface geology, topography and many other factors), but rather as a rough distribution to allow us to approximate direct and indirect and cumulative impacts through habitat fragmentation analysis. Additionally, the results measured here are conservative because they include only impacts from roads and well pads but no other existing or new infrastructure such as pipelines or pumping stations, and because the best road data available was missing some existing routes. Consequently, our results will notably underestimate the true wildlife impacts. The Draft RMP should have used GIS to conduct build-out analysis and habitat fragmentation analysis to evaluate the impacts on wildlife as recommended in out reports Wildlife at a Crossroads: Energy Development in Western Wyoming and Analysis of the Little Snake Resource Area "Sage brush Habitat Fragmentation Proposal from the Cooperating Agencies." The Draft RMP does not use spatial analysis to evaluate indirect or cumulative impacts. It does	programs, which include separate leasing, exploration, and development stages." IBLA (2008-249) summarized this same problem by noting that "agencies continually narrow their focus, from the large land areas potentially subject to oil and leasing to the particular lands to be leased, and, finally, to the exact sites proposed for surface-disturbing activities." The commenter's request to analyze indirect impacts by developing a GIS-based build-out scenario jumps ahead in this process. Again, in Northern Alaska Environmental v Kempthorne, the Ninth Circuit Court of Appeals concluded that "no…drilling site analysis is possible until it is known where the drilling is likely to take place, and that can be known only after leasing and exploration. The government points out that the environmental consequences at specific sites can be assessed in connection with later applications for permits for drilling at those sites, and that no permits should issue without extensive site specific analysis of adverse environmental effects and of the mitigation measures appropriate to minimize them." An assumed build-out scenario is an analysis of potential drilling sites, which are not known at this time. Further analyses would be conducted prior to surface disturbing activities associated with oil and gas development. Further, it is impossible for this Draft RMP/EIS to analyze route densities, as chapter 2 does not propose to designate or build any roads. While it is understood that there will be roads and trails designated and that roads could be constructed to support oil and gas development, such actions and their location are not part of the alternatives and therefore not the subject of site-specific analysis, such as assuming their placement on the landscape then analyzing the assumed placement. The Draft RMP/EIS does conclude that oil and gas development could fragment wildlife habitats under certain alternatives. Chapter 2 proposes a variety of potential strategies to mitigate those impacts, and chapter 4 analyses those strategies. BLM has reviewed the documents provided by the

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		not evaluate how route density varies across the landscape generally and in specific wildlife habitats. The Draft RMP does not analyze or establish goals for core habitat patches (unroaded patches) in specific wildlife habitats. The oil and gas development (including all related infrastructure described under the preferred alternative will clearly cause substantial habitat fragmentation. Infrastructure needs to be evaluated using the latest science and spatial analysis and the results need to be used to craft a preferred alternative that helps protect wildlife and other resources.	commenter. These comments, along with others, led BLM to increase protections for sagebrush habitat in Alternative C of the Proposed RMP/Final EIS.
Energy and Minerals	A. Alldredge	Timing limitations do not protect habitats and they apply only to development phase of projects. Development may occur outside the period of timing limitations and thus habitat is reduced. The end result is that although animals are not as exposed to disturbance during a critical period of the year, the following year they return to these essential habitats only to find them undisturbed and with a reduced carrying capacity. Once development is completed, there appear to be few restrictions on activities during the production phase. The document does not clearly elucidate what constitutes the development phase and the production phase and provides little assurance that impacts will not occur during the production phase. Technology available today allows energy companies to conduct additional development in areas that were once through to have been fully developed. The BLM must provide a rigorous and enforceable definition of the development phase and the production phase and clarify impacts and mitigation associated with these activity periods. Clustering of wells, central condensate collection facilities and remote well monitoring are good methods of reducing impacts during production phases.	Timing limitation stipulations are designed to protect habitats during sensitive life cycle periods. In addition, BMPs are applied on a site specific basis to reduce, prevent, or avoid adverse environmental or social impacts. BMPs need to be adapted to meet the site-specific requirements of a particular project as well as the local environment. They are incorporated into site-specific project proposals and supported by site-specific environmental analysis.
Energy and Minerals	Pete Aniello	As a former Colorado resident, I was disappointed to see that the BLM's preferred alternative for managing the Little Snake area is Alternative C. A good chunk of Northwest Colorado has already been turned into a pin-cushion by all the new oil and gas drilling that has occurred there over the last several years. The last thing it needs is more drilling and more off-road vehicle use, in an area like the Little Snake. I'm hoping you'll change your mind, and pick Alternative D, which will benefit more people and wildlife than the currently preferred alternative	See General Comment Response #1
Energy and Minerals	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: q. condensate removal: pipe rather than truck condensate off site.	Mitigation measures for specific activities are developed at the activity level to best address the site-specific conditions. In addition, BLM has modified chapter 2 in the Proposed RMP/Final EIS to implement management to protect large

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			unfragmented blocks of sagebrush habitat.
Energy and Minerals	Barbara Banke	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health. Off-road vehicles should be restricted to designated routes, and all 12 eligible areas of "critical environmental concern" should be designated to protect essential habitat for imperiled plants, greater sage grouse and prairie dogs.	See General Comment Response #13
Energy and Minerals	Michael Bartell	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Bruce Bernstein	DRILLING IS NOT THE ANSWER TO OUR ENERGY PROBLEMS. TELL YOUR BOSS THAT OTHER SOURCES OF ENERGY (like Hydrogen autos) ARE THE ANSWER. EVEN THOUGH HE'S BEEN TOLD, IT WILL NOT HURT TO TELL HIM AGAIN AS HE SEEMS FAIRLY DENSE WHEN IT COMES TO HEARING THINGS THAT ARE CONTRARY TO HIS (MAJOR OIL COMPANIES) IDEAS.	See General Comment Response #5
Energy and Minerals	Black Canyon Audubon Chapter 28478	Alternative D is also much more acceptable regarding Oil and Gas drilling. The much larger areas of NSO in D is a very important difference. This leaves most of the gas still recoverable without the destruction of land owned by all citizens and required for healthy wildlife populations. As you obviously know the roads to the pads are often the most damaging part of energy development. Even if the roads can be obliterated eventually, the associated weeds are permanent in all drilling areas I've seen. The 1/4 mile buffer around Sage Grouse leks is generally considered to be much too small. Your map of four mile radii suggests that you're aware of studies indicating that more protected land is needed to allow grouse to survive year round. Best Management Practices for Sage Grouse should be implemented throughout the area. White tailed prairie dog towns should be protected from fragmentation whenever possible. We realize that this may not be popular, but living in an area of the west slope with no Burrowing Owls left and very few Ferruginous Hawks, makes us wish we had done more regarding dog towns. Under any alternative, it is imperative that cumulative impacts be considered for oil and gas development, rather than project by project effects (like some land management offices do). Obviously, this is the job of this plan.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. The NSO stipulation around sage-grouse lek sites has been increased from a 0.25-mile radius to a 0.6-mile radius to reduce potential impacts.
Energy and Minerals	Cary Bohl	Please consider thoughtfully how powerful the oil and gas industry has become in this nation. I have seen it on the local level when the	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended

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		drilling company that violated numerous local ordinances and national environmental law had their fines substantially reduced...the streams and the rare ecosystem (previously identified as a Biodiversity Area with rare plants) which they disturbed, permanently destroyed. Why does this happen? Undoubtedly many all over this country have also recognized and been discouraged by this apparent unbalanced and preferential treatment toward this particular industry. What can we do? You are in the position to do something. Please don't allow oil and gas to have their way with the valuable wildlands of northwest Colorado, and the Vermillion	that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Joan Bossart	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	Marilyn Britton	WE SHOULD BE DOING MORE TO DEVELOP ALTERNATIVE SOURCES OF ENERGY INSTEAD OF DESTROYING SO MUCH OF OUR COUNTRY'S PUBLIC LANDS LOOKING FOR OIL.	See General Comment Response #5
Energy and Minerals	J. Brocki	Not only will drilling in the Vermillion Basin destroy ecological and archeological resources that cannot be replaced, it will prove that the Bush Administration cares only about making money for oil companies and not the world that we leave our children and grand children. Do you have grandchildren Mr. Casterson? Do they deserve to receive a planet that can be lived on? We need to move away from fossil fuels as quickly as possible and to save as many wildlands as we can. Few enough are left to save that I beg you sir to think of your grandchildren when making this decision rather than the greed of those who already have more than their share.	Wind and solar energy are the primary potential sources for renewable energy generation. The development potential for biomass, hydropower, and geothermal renewable energy sources is minimal in the decision area. The Little Snake Draft RMP/EIS includes management actions that provide access for the development of renewable energy sources, however interest in developing renewable energy resources in the RMPPA has not occurred to date. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Sheila Bruggen	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13

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Energy and Minerals	Sheila Bruggen	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Angie & Ken Cairn	Please lower the percentage (93) percent open to O&G leases. There must be a more balanced approach that actually safeguards these reserves for future use. Why are we getting all we can now? Yes, the market is pushing it, but let's think about some reserves,	See General Comment Response #1
Energy and Minerals	Erin Campion	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	Hope Carr	Opening 93% of the Little Snake Resource Area to oil and gas development is not the way to go. The management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Cheryl Champy	It has become increasingly apparent to all Americans that oil is not the answer to our energy future. Instead of spending money on drilling for oil, we should be putting our efforts into sustainable energy development. Oil is a short-term, short-sighted solution. Its negative impact on the landscape and the environment is permanent.	See General Comment Response #5
Energy and Minerals	Catherine Clark	You need to get with the program and start funding alternatives to gas and oil that are viable.	See General Comment Response #5
Energy and Minerals	Jackie Cleveland	Why isn't our country developing Ethanol gas alternatives, like Brazil has done since the 1980's! It’s made from sugar and is cost effective and burns clean, which does not pollute the air. Chevrolet already has cars developed and are working in that country that run on both gas and Ethanol. Why is our country being forced into being dependent on gasoline and into selling off our precious National Parks to produce gas fuel we could be free of!!!??? If you are a true American then please stop selling our precious country down the river.	See General Comment Response #5
Energy and	Angelo Cohen	The appropriate plan would be to bring a halt to any and all oil and	See General Comment Response #5

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Minerals		gas activity throughout our environment. Incentives to gravitate towards cleaner, renewable, and eventually emission free energy, with the least environmental impact possible, must be aggressively put forth in order to minimize the human impact on global warming.	
Energy and Minerals	Thomas Cole	Please keep oil & gas development out of this region. No revenue stream can possibly offset the damage that will be done to this pristine area.	See General Comment Response #1
Energy and Minerals	Colorado Department of Natural Resources	Within this sea of development, there are special places of unique environmental, wildlife or archeological value that may require interim protection without sacrificing national energy interests. The Vermillion Basin, a 77,000-acre unleased block of land, is one such place. Currently, the Vermillion is a fragile, untrammeled, stark, intimidating landscape not found elsewhere in Colorado. It provides a beauty, solitude and recreational value for many people within and outside of Colorado. Importantly, the Vermillion represents only 2% of the "high potential" gas reserves in the Little Snake Planning Area. In light of these factors, we support a 15-20 year "no lease" option for the area during the life of the Little Snake RMP. We do not believe such a decision will impact gas production to any measurable degree. The state and federal government will preserve the option of revisiting any leasing decisions for natural gas development upon the expiration of the plan. We note that this approach to defer any leasing and drilling decisions for the Vermillion was supported by over 75,000 public comments.	Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Colorado Division of Wildlife	Adding to this complicated situation, there is shallow coal-bed methane (CBM) in some areas: eastern portions of the Sand Wash geologic basin, in the lower White River drainage and in the Danforth hills and a deeper conventional natural gas resource throughout most of the LSFO. Because of this combination of resource types, LSFO's RFD scenario may well underestimate future development. This multiple resource scenario usually results in different mineral owners of the shallow and deep oil and gas resources. Greater surface disturbance can occur because different oil and gas companies have the right to access their minerals via their lease. Given these circumstances, 5% disturbance per mineral lease could amount to a lot of aggregated disturbance on the surface of the lease. These concerns would be reduced in areas with large mineral lease blocks and where only one resource is available to be leased throughout the whole vertical column of	BLM is confident in its Reasonable Foreseeable Development (RFD) Scenario. An oil and gas lease includes all oil and gas resources at all depths. There cannot be different lease holders for oil and gas resources at different depths for the same area.

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Energy and Minerals	Colorado Mountain Club	ENERGY: In regard to energy development, the preferred alternative C in the draft EIS opens nearly all of the resource area for energy leasing and development. The amount made available to industry is greatly out of balance with other land uses, needs and interests. One could even make an assumption that leasing virtually every acre of the resource area constitutes a violation of the Multiple Use and Sustained Yield Act of 1960. While the Act does not assume or mandate multiple use on each and every acre of a management area, the likelihood of other sustainable activities on leased land is low, making the leased land in reality single use rather than multiple use. At the very least, all areas with identifiable wilderness characteristics should be closed to energy development. Of particular concern is the intent within the preferred alternative to open the entire Vermillion Basin to energy development despite the agency's finding that 77,000+ acres of the over 86,000 acres of the area studied contain wilderness characteristics. Even the low potential southern end of the study area is to be made available for leasing. The preferred alternative further advances a concept of staged development with only portions of Vermillion available for actual development at a given time. The northwest portion of Moffat County containing Vermillion is one of the most productive areas for elk hunting on the entire North American continent. It makes no sense that the preferred alternative would sacrifice this important part of the local economy in order to add Vermillion to the immense areas in Colorado and southern Wyoming that already are open for leasing and intensive development. There is little information contained in the preferred alternative as to cumulative impact on big game habitat from energy development not only in Vermillion, but in surrounding areas such as Hiawatha. There is also little information concerning impact on air quality from massive new development in this area. What is the impact then from dust, fumes, compressor noise and emissions? These impacts must be studied prior to further leasing anywhere in the area. It is noted that the already developed places north of Vermillion Basin, particularly the Hiawatha area, are slated for additional energy development. Development in areas of the Little Snake other than Vermillion Basin should be done in a staged manner so as to measure impacts. Given that industry actually has not developed many of the new Colorado leases obtained in recent years, it makes no sense to turn over Vermillion Basin to industry	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.

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		simply to stockpile those leases. Vermillion should continue to remain in a protected status without leasing, perhaps as an SRMA for primitive, non-motorized recreation. An additional concern is the lack of credible bonding requirements for the energy industry. The preferred alternative should emphasize that bonding will be required commensurate with actual risk. As an aside, the current bonding requirement for all of a given company's wells in Colorado of $10,000 is ridiculously low. The preferred alternative seems to be weak in the areas of requiring best management practices in energy development and in requiring use of new technologies such as directional drilling. These should be strongly emphasized in the preferred alternative. I note that several areas envisioned for hunting and primitive, non-motorized recreation continue to be listed in the preferred alternative as available for energy development. These are Fly Creek and Serviceberry. Energy development is not compatible with primitive recreation or hunting. Both areas should be withdrawn and made unavailable for fluid minerals leasing.	
Energy and Minerals	Colorado Whitewater	The management plan should incorporate best management practices for oil and gas drilling, in keeping with the Wildlife Protection Guidelines for Oil and Gas Development (2006). These guidelines were developed by the Colorado Mule deer Association and the Colorado Wildlife Federation, and were endorsed by 66 wildlife, environmental and recreation groups, including Colorado Whitewater. Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in the preferred alternative, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat. Thank you for considering these comments, and for protecting the unique and wonderful lands and waters of Northwest Colorado.	Best management practices (BMP) are applied on a site specific basis to reduce, prevent, or avoid adverse environmental or social impacts. BMPs are not one-size-fits-all situations. BMPs need to be adapted to meet the site-specific requirements of a particular project as well as the local environment. BMPs are incorporated into site-specific project proposals and supported by site-specific environmental analysis. The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Energy and Minerals	Colorado Wildlife Federation	Much of the Little Snake Resource Area already is under lease. BLM must consider and address the context and cumulative reality on the ground on a landscape scale. No new leases or development should be authorized in crucial big game habitats until BLM has conducted	A cumulative impact analysis has been conducted and included in Section 4.6.3 of the Draft RMP/EIS. BLM does not believe it is necessary to close big game crucial habitat to new leasing, but rather to

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		a thorough analysis on the practical efficacy of existing stipulations and other measures that are in place, and adopts additional measures to preserve the ecological function of these lands	prohibit activities during specific time periods. The following is a management action regarding big game habitat under Alternative C (see page 2-20 of the Draft RMP/EIS): "Crucial winter habitat would be closed to surface disturbing activities from December 1 to April 30, with the intent of this stipulation remaining consistent with big game hunting season. In the case that hunting season extends later, exceptions would be applied according to Appendix E. Big game birthing areas would be closed to surface disturbing activities for the following species and during the following periods: elk calving (April 16 to June 30), pronghorn antelope fawning (May 1 to July 15), and bighorn sheep lambing (May 1 to July 15). BLM believes that implementing this timing stipulation is an appropriate method to protect big game populations and habitat.
Energy and Minerals	Andrea Cousins	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Andrea Cousins	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Sam Cox	I urge the adoption of Alt. D. Recognizing the economic incentive and national directives that exert pressure to allow increased oil/gas drilling, I see a compromise that could allow both full wilderness preservation and full mineral extraction in Vermillion Basin. Why not keep a directional-drilling option open? Directional drilling technology improves every year, and costs continue to go down. While the limit is 6 miles or less this year, it may be 10 miles next year and 20 miles the year after that. There are numerous geologic factors influencing local directional drilling potential, but due to economic incentives, people are finding solutions to these limitations all the time. It's a fact that directional drilling is more expensive that vertical drilling, but it's also a fact that the oil companies made	See General Comment Response #3

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		record profits in 2006. I don't think it's too much to ask that some of that profit goes into making sure the land isn't destroyed by road and drill pads. Federal land is rightfully the property of all Americans, and it should not be despoiled for the short-sighted profit of a select few. Therefore, if Vermillion Basin were designated as a No Surface Occupancy (NSU) area, no surface drilling operations would be allowed inside the basin, but the option to extract oil/gas by directional drilling from adjacent areas would remain open. This seems like a reasonable compromise to me, and perhaps it could be worked into Alt. D.	
Energy and Minerals	Kirk Cunningham	The BLM has shown to my satisfaction that it is largely incapable (due in part to gross Administration misdirection) of directing a minerals resources leasing program that protects both their present road system is pretty marginal. The BLM should vigorously protest each and every such claim and generally treat them with the contempt that they deserve.	See General Comment Response #1
Energy and Minerals	Jennifer DiMeo	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Jennifer DiMeo	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Margarita & Steven Downs	5. In ALL areas that are ultimately leased, include Lease Terms that address: -Utilization -Best Management Practices -Clustering multiple wells on a single pad (directional drilling) -Strict environmental protection during exploration and extrication -Strict restoration standards and bonding AFTER completion and into the production phase.	The recommendations in the comment are included in the Preferred Alternative (Alternative C) of the Draft RMP/EIS. As stated on page 2-64 of the Draft RMP/EIS, "The use of a variety of BMPs would be encouraged, as defined by Best Management Practices for Oil and Gas Development on Public Lands, which can be found at http://www.blm.gov/bmp/. These BMPs may be changed over time." As stated on page 2-68 of the Draft RMP/EIS, "A Plan for Surface Reclamation is required with every APD or POD and is subject to approval by the authorized officer. The Surface Reclamation Standard described in Appendix O will be attached

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			as a COA to APDs and associated ROWs. The Surface Reclamation Standard could be modified on the basis of new information or to meet specific needs, but the protection level envisioned in the COAs would be maintained."
Energy and Minerals	John Dye	STOP DRILLING, DEVELOP ALTERNATIVE ENERGY!	See General Comment Response #5
Energy and Minerals	Teri English	I oppose the BLM's preferred alternative, which would open up some of our nation's most pristine wildlands to damaging oil and gas drilling and off-road vehicle traffic. Damage to the lands and ecosystems caused by this plunder and "recreational" use outweighs any possible benefits. Our nation, even the president, has realized that alternative sources of energy are needed -- alternatives to gas and oil. This plan is a step backwards. Respect for nature is "in".	See General Comment Response #1
Energy and Minerals	Environmental Protection Agency (EPA), Region 8	• Surface area disturbance from oil and gas wells: The DEIS uses for analysis purposes over 3,000 oil and gas wells with projected impacts to 49,261 acres (before reclamation) which is a larger disturbance area per well than we have seen in other EISs. For example, the Pinedale Anticline Oil and Gas Exploration and Development Project reported 4,399 natural gas wells on 12,278 acres of now disturbance. EPA recommends that the EIS include additional discussion of opportunities to further avoid and minimize the extent of ' disturbance in the Little Snake Resource Area, and explain whether there will be mitigation measures in place to reduce the potential water quality and other resource impacts associated with the large area of disturbance. EPA also suggests that the EIS include analysis of whether directional drilling, for example, which could greatly reduce the footprint of these activities, is a feasible practice in this area.	The difference between the largely exploratory nature of oil and gas drilling within the LSFO and drilling within established, producing oil and gas fields in Pinedale planning area is substantial. Pinedale assumed that up to 32 wells would be drilled from one pad, which significantly reduces surface disturbance per well. This practice is less feasible in LSFO. Additionally, there is less existing oil and gas-related infrastructure (roads and pipelines) in the Little Snake planning area. These factors lead to using a more conservative assumption for oil and gas related disturbance in the planning area. Minimizing oil and gas-related surface disturbance is an important goal in the Little Snake RMP. The sagebrush protection approach outlined in Section 2.5.5.2 is a central strategy in limiting surface disturbance. In addition, changes have been made to this approach in the Proposed RMP/Final EIS to mandate a 5% or 1% surface disturbance limitation for new leases within medium and high priority sagebrush habitats. Additionally, application of mitigation measures and/or BMPs to reduce the area disturbed would be applied case by case and cannot be projected at this time without field development proposals. When such a project proposal is received,

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			BLM will analyze requirements to minimize surface disturbance. The feasibility of directional drilling varies throughout the planning area, depending on geology and other factors. For analysis purposes, BLM assumes that directional drilling would be able to reach a distance of a quarter-mile laterally.
Energy and Minerals	May Faulk	We should be developing solar and wind and hydrogen energy not continuing the hopeless oil search. Look to California for your new energy needs the governor is trying newer technology not stuck in the past.	See General Comment Response #5
Energy and Minerals	Robert Ford	Why not open it to wind farms or some other form of alternative energy that requires less hassle to erect and maintain. Doing this would mean you could continue to run the alternative forms of energy for as long as needed or until better technology comes along. With oil and gas it is only there until you take it all. What a concept this renewable energy stuff is!!	See General Comment Response #5
Energy and Minerals	Form Letter #3	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	Form Letter #6	The RMP should limit oil and gas impacts by requiring best management practices including directional drilling, and capping surface disturbance to one well pad per 640 acres, especially when drilling in sensitive areas.	See General Comment Response #13
Energy and Minerals	Form Letter #8	RECOMMENDATIONS •Areas that are important for maintaining wildlife populations, remnant plant communities, cultural resources, visual resources, critical habitat and wilderness characteristics should not be leased or drilled. If leasing or development does occur, it must occur without disturbing the surface via a No Surface Occupancy stipulation. Where surface use is appropriate, its location and levels must be controlled to protect habitat and guard against economic busts.	The Little Snake RMP includes oil and gas leasing stipulations to protect fish and wildlife resources, vegetation, cultural resources, and visual resources. These stipulations include controlled surface use, timing limitation stipulations, and no surface occupancy. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS.
Energy and Minerals	Form Letter #8	Surface-disturbing activities must be limited in their scope and reclaimed on a rolling basis.	The Little Snake RMP includes BMPs, stipulations, and management prescriptions to reduce and

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			minimize surface disturbing activities and impacts.
Energy and Minerals	Form Letter #8	Implement a reclamation guarantee system that follows the well regardless of ownership to ensure that sufficient funding is available for reclamation.	BLM already requires bonding of surface disturbing operations. Any changes to the current bonding process would require a regulation change, which is beyond the scope of an RMP.
Energy and Minerals	Form Letter #8	•Best Available Technologies must be utilized for any and all practices	See General Comment Response #2
Energy and Minerals	Form Letter #8	•BLM must require oil and gas operators to implement non-flaring wells and scrubber stacks on all compressor and generation stations.	See General Comment Response #2
Energy and Minerals	Form Letter #8	BLM must not lease within municipal watersheds and where there are existing leases, BLM must require a No Surface Occupancy stipulation.	Appropriate BLM stipulations and Conditions of Approval are applied to those leases which may be within municipal watersheds. The operator must comply with all federal, state, and local regulations and is required to submit a plan of development before developing leases in these areas. Measures to protect resources such as groundwater are included in oil and gas leases are addressed in CFRs and are developed by site-specific NEPA analysis, as appropriate. The action of leasing has no impact on municipal watersheds.
Energy and Minerals	Lacy Galtere	Please consider what will be done to the ecosystem if you choose to open up Colorado for oil and gas drilling. I know we are in a rush to obtain these resources from somewhere other than the Middle East, but we must remember that most things end bad for us when we rush into them. Take POPs for example (Persistent organic pollutants, such as DDT and PCBs). We did not take the necessary precautions before deciding to release all of these chemicals into the environment. It has cost us millions if not billions of dollars more to clean up the mess than it probably would have cost us to prevent it from happening in the first place. With all of the wrong decisions we as Americans have made in the past, I think it would be in our best interest to completely investigate the potential outcomes before jumping into something without possessing knowledge of how it will impact everything involved. Far too often, we jump on the bandwagon without examining ALL of the facts. Please investigate fully the impacts before you make your decision; serve as an example to our "leaders" that this is how things should be done.	See General Comment Response #1
Energy and Minerals	Charles Garvin	Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres,	See General Comment Response #13

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		and requiring best management practices including directional drilling.	
Energy and Minerals	Charles Garvin	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Tina L. Gaston	We should be putting money into developing alternative reusable fuel use in areas not dirty gas/oil drilling.	See General Comment Response #5
Energy and Minerals	Richard Goerwitz	The oil and gas aren't going anywhere, and over time they will only become more valuable anyway, so the longer we wait, the smarter we'll be - and the better chance we have of managing the impact of industrial activity on air quality, water quality, and wildlife.	See General Comment Response #1
Energy and Minerals	Linda Gordon	Keep our wild lands WILD and untouched. How about using funds to promote alternative fuels and energy sources????	See General Comment Response #5
Energy and Minerals	Kristjan Gunnarsson	I am alarmed that the BLM has indicated that it is ready to hand this land over to oil and gas drilling. I am not against drilling as a principle but feel that a balance needs at all times to be struck between conservation and industrial exploitation. I think the BLM is about to go way too far in the extreme position of favoring the oil and gas industries.	See General Comment Response #1
Energy and Minerals	Scott A. Hahn	Oil and gas leasing should be allowed as with other legal business activities and should not be grouped with other personal uses.	See General Comment Response #8
Energy and Minerals	Rick Hammel	We are concerned that the BLM did not go far enough to establish incentives for the use of BMPs and best available technology (BATs).	See General Comment Response #2
Energy and Minerals	Rick Hammel	But for this introduction, we are insisting that all BMPs and BATs become mandatory, rather than voluntary.	See General Comment Response #2
Energy and Minerals	Rick Hammel	The leasing of public lands in the RMPPA has reached a critical level; almost all of these lands are leased. Leasing must stop so that there is some public land that does not have the potential for oil and gas (O&G) development.	See General Comment Response #1
Energy and Minerals	Rick Hammel	We are extremely emphatic that there be no winter drilling in the RMPPA. Our winters are severe enough that all species are stressed and human presence adds to that stress. In fact researchers have recommended that there be no human presence	See General Comment Response #1

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		be in similar situations in the Pinedale, Wyoming area. (Sawyer, H, et al 2006)	
Energy and Minerals	Rick Hammel	We also ask that the BLM allow well pad spacing of no more than 640 acres. Multiple wells may be drill from a pad	See General Comment Response #13
Energy and Minerals	Rick Hammel	1.6.4 Air Quality Page 1-12 While air quality is monitored by EPA, the BLM should make some stipulations with drilling operators using old and antiquated drilling rigs. They should be up-to-date in technology and fuel uses. Ideally drill rigs would be powered by electricity or natural gas, but lacking that, biodiesel.	All drill rig engines would be required to meet applicable Colorado Department of Public Health and Environment (CDPHE) Air Quality Control Commission (AQCC) regulations and EPA emission standards. Upon site-specific NEPA analysis, BLM could apply necessary mitigation as COAs or BMPs.
Energy and Minerals	Rick Hammel	To reduce unnecessary surface disturbance, drilling platforms should be used. They are similar to what is being used I off-shore drilling and in ANWR. These platform rest on pilings and most have six to eight legs. Assuming each leg is 2 feet in diameter and assuming 8 legs, the total surface disturbance would be 25.12 square feet. Trailers and associated structures would add to this dimension. The total disturbance would be well under the Average 6 acres per well site.	See General Comment Response #37
Energy and Minerals	Rick Hammel	The next item is how does the product get transported away from the well site? Another habitat loss reduction practice has been developed by BP, is the use of flexible pipe. It was originally developed for under-sea use. It has been in use in the Gulf of Mexico and the North Sea for fifteen years. It is four inches in diameter by a mile in length. It has a continuous high density liner that is completely erosion proof. This piping may also be re-used.	See General Comment Response #2
Energy and Minerals	Rick Hammel	While the oil and gas industry complains the horizontal drilling is not cost effective, literature suggests otherwise. Horizontal drilling technology must be implemented to comply with the National Energy Policy (Molvar, 2003). It is understood that agencies and the energy industry is reluctant to use these technologies. By using directional drilling, drill companies can tap deposits of oil and gas at almost any depth from drilling sites up to 6 1/2 miles away. Increased productivity of directional drilling compensates for the increased costs of directional drilling. This then becomes more profitable than vertical drilling.	See General Comment Response #3
Energy and Minerals	Rick Hammel	Cost experts have agreed that horizontal wells have become a preferred method of recovering oil and gas from reservoirs in which these fluids occupy strata that are horizontal, or nearly so, because they offer greater contact area with the productive layer than vertical wells. While the cost factor for a horizontal well may be as much as	See General Comment Response #3

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		two or three times that of a vertical well, the production factor can be enhanced as much as 15 or 20 times, making it very attractive. To give an idea of the effectiveness of horizontal drilling, the U.S. Department of Energy indicates that using horizontal drilling can lead to an increase in reserves in place by 2% of the original oil in place. The production ratio for horizontal wells versus vertical wells is 3.2 to 1, while the cost ratio of horizontal versus vertical wells is only 2 to 1. Horizontal Drilling.Org By utilizing horizontal drilling, surface disturbance can be reduced to far less than the proposed 5%. Utilizing EFD, reclamation almost becomes a non-issue, whereas conventional drilling will require up to 50 years to complete	
Energy and Minerals	Rick Hammel	By unitizing horizontal drilling, The 160 acre well spacing is no longer a factor. 640 acre spacing is more in line as what the BLM should be investigating as minimum well spacing.	See General Comment Response #13
Energy and Minerals	Rick Hammel	Criterion #2 - Under the fifth solid bullet, add the term: Environmentally Friendly Drilling (EFD) concepts, as being developed by Texas A&M University, Nobel Technology, et al. Or change: "limited impact drilling" to Environmentally Friendly Drilling (EFD). Reason: This is a sanctioned program funded by DOE and should be reflected in this section that deals with wildlife waivers	See General Comment Response #37
Energy and Minerals	Rick Hammel	Footprint Reduction: The latest technologies in footprint reduction are not included here. Many new technologies are available from Department of Energy, Low Impact Oil And Gas (LINGO) Eye on the Environment, Winter 2006 Vol 1. A copy of this publication was given to the BLM at the first of December 2006, but was not included in the printing. Footprints can be reduced by using platforms that sit on pilings. There is no need to scrape out a 6 acre pad. Roads can be reduced to virtually no impact be the use of "disappearing roads."	See General Comment Response #37
Energy and Minerals	Rick Hammel	Oil and Gas Leasing Decisions (Page 2-56 Through Page 2-75) There are many actions here that we can conclude as warranting Alternative D. We request the BLM to make decisions that will afford lands in the Resource area, the greatest amount of protection. While we are not opposed to gas drilling, per se, we are opposed to needless surface disturbances. Therefore, we must advocate the use of Alternative D as the best way to protect these lands.	See General Comment Response #1
Energy and Minerals	Janet Hansen	I also question whether even limited energy exploration and development should be appropriately allowed.	See General Comment Response #1

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Energy and Minerals	Janet Hansen	I think the BLM's plans should try to conserve the natural landscape and all the life thereon (what I call God's creation)by: - Keeping oil & gas drilling out of Vermillion Basin and other proposed wilderness lands, and extremely limiting off-road vehicles. - Where you do allow oil and gas drilling, only allow one well per 1280 acres, and require best management practices such as directional drilling. At MOST I think oil & gas drilling should be only 5-7% of the area (NOT the reverse, the 93% proposed)!!!	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Michelle Higgins	Why are we even thinking of drilling for anything?? Please remove subsidies from these industries and move to renewable power now!	See General Comment Response #1
Energy and Minerals	Cynthia Hines	I urge you to take the appropriate action to protect the Little Snake Resource Area from oil and gas development. The energy corporations have proven repeatedly that they cannot be trusted to preserve and protect the environment. There primary motivation is to make as much profit as possible, not to be stewards of the lands. That's your job. Our need for energy and our need to preserve some areas of our environment are equally important but conservation has continually received short-shrift.	See General Comment Response #1
Energy and Minerals	Carol L. Hinkle	Although energy development is appropriate on some BLM lands, the BLM's preferred alternative displays a disturbing emphasis on extractive industry and wide-spread oil and gas leasing. This problematic trend has roots in direction given the BLM by the Bush administration, and it is one which must be stopped. The BLM should instead follow the direction set by our state leaders, emphasizing renewable energy and balancing sensible leasing and drilling with protection for the many other resources on our public lands. Energy development should only occur outside proposed wilderness areas and important wildlife habitat. Where development is appropriate, a phased approach should be taken to minimize impacts and to guarantee the continued vitality and well-being of the region.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Wind and solar energy are the primary potential sources for renewable energy within the Little Snake Field Office. The Little Snake Draft RMP/EIS includes management actions that provide access for the development of renewable energy sources.

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			Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Arlene Hoffman	-prohibit oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #1
Energy and Minerals	Patrick Huber	The BLM draft is weighted much too heavily towards oil and gas drilling and ORV use. For starters, those lands proposed for wilderness designation should be off-limits to oil and gas as well as motorized vehicles. It is simply irresponsible to further degrade those few remnant intact landscapes on our public lands. Similarly all 5 eligible Wild and Scenic stretches of river should receive protection.	See General Comment Response #1
Energy and Minerals	Patrick Huber	Oil and gas development impacts should also be reduced in those areas outside proposed wilderness where there are significant biological resources, such as sage grouse and big game habitat. This can be accomplished through reductions in well densities in these areas.	See General Comment Response #1
Energy and Minerals	Barbara Hughes	Limit oil and gas impacts on sage grouse and big game habitat by capping surface disturbance at one well pad per 640 acres, and require best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Coralie Hunter	The U.S. needs to seriously consider challenging its citizens to reducing our dependence on fossil fuels.	See General Comment Response #5
Energy and Minerals	Kimberly Idol	It is time for the government and the oil and gas industries to dedicate themselves and their vast resources to research in developing renewable, non-destructive (to people and the planet) energy alternatives.	See General Comment Response #5
Energy and Minerals	Renee Igo	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Bill Israel	Your must also restrict oil and gas activity to one well per 640 acres and protect wildlife habitat, air and water quality, and human health. Off-road vehicles should be restricted to designated routes, and all	See General Comment Response #13

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		12 eligible areas of "critical environmental concern" should be designated to protect essential habitat for imperiled plants, greater sage grouse and prairie dogs.	
Energy and Minerals	Laura Jobe	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Henry Keesling	p. ES-15, windmill image: Why mention just wind energy development? Solar energy development exists here as well. In any case, the wind energy development needs to have a more informative statement developed. As apparent on map 3-36 and on WSA and ACEC maps, the "excellent and above" areas fall within these designations. Further, there will be needed infrastructure, power lines, roads, buildings etc. for this development. If the best available technologies are to be used, then areas that are less "excellent and above" could be used as well. This paragraph, should include all energy development including, wind, solar, bio mass, etc.	See General Comment Response #5
Energy and Minerals	Henry Keesling	P. 2-31, p. 2-33, Support Service Goal B: Page 2-33, first bullet: It makes little sense as a goal Class III survey areas based upon probability of something happening and possible/potential impacts to cultural resources as a result. Read Chapter 3 of this DRAFT. In any case, if one proceeds with this goal, and areas are proposed, what happens then? Oil and gas program will fund cultural surveys for an Oil and Gas Lease area with 100s if not thousands of oil and gas lease acres that will never be impacted. This is a non-goal. This is a suggestion found in the Oil and Gas "Gold Book". This refers to doing block Class III survey within areas of the lease that will be developed. However, it is only a suggestion, nothing more. A goal to provide something with limited or no use seems to be a waste of resources.	The bullets under Goal B are objectives for achieving the goal. The first bullet is a means of prioritizing areas for new field surveys in areas where conflicts could occur.
Energy and Minerals	Henry Keesling	p. 2-4, second paragraph "...a deal would have to be worked out…to purchase those acres as "disturbance credits"." Please explain in terms related to the oil and gas and/or realty programs that BLM LSFO operates under that would authorize the "deal" to purchase acres of Public Land. Is this an Oil and Gas Gold Book standard? Is this another attempt of LSFO making policy without Washington or the State participating? What would happen if no "deal" were forthcoming? Would the Oil and Gas Lease be returned to the BLM?	The Proposed RMP/Final EIS has been modified to clarify the intent of mitigation areas. The intent is to allow operators to accumulate additional acres available for them to develop by obtaining additional oil and gas leases which would be part of the unit but would not be developed.

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Energy and Minerals	Henry Keesling	Like the shell game that is already in place regarding oil and gas leases and-reclamation, Company A buys the lease, does what it does, and then sell the lease to Company B. Company B does what it does, and again sells to another company, and so on until the last company to have the lease just walks away. All the companies have built roads and built drilling pads. These, if not in production, were sold in the lease to the next company. No adequate reclamation was ever done on the disturbed areas. So the last company walks. The $5,000 National Bond (Nation Wide Bond) is forfeited to the General Fund. NO reclamation ever was carried out on the impacts caused by the companies on this Public land. Change this result. Do not create yet another new "deal". Powder Wash, Hiawatha, and surrounding areas are an example of failed reclamation efforts and lack of BLM efforts to manage the Public Land. Thus the current weed problem exists. The Public needs to know that this process has been presented to, discussed with, and accepted by the BLM Washington Office and Colorado State Office. The concept proposed here needs to be developed and fully explained to the Public. Better yet instead of a "deal", how about establishing a timetable for current oil and gas lease holders to start reclamation efforts addressing weed and soil control as soon as possible, e.g., next growing season, on everything related to oil and gas development, past and present. In any case, the existing rules allow for too many loopholes and escape clauses to work.	BLM requires oil and gas operators to reclaim surface disturbance, per On Shore Order #1. On Shore Order #1 was revised in May 2007 and now requires operators to close and reclaim reserve pits within 6 months of release of the drill rig. LSFO's reclamation standards are included in Appendix O. These standards will be included as COAs for each APD.
Energy and Minerals	Henry Keesling	p. 2-169: None of the weed issues will be carried out or be successful as long as the reclamation requirements can be sold to the next oil and gas operator. The $5000 National Bond is not enough money to get the needed successful reclamation and weed control accomplished. It is cheaper to walk away from any required BLM reclamation efforts by forfeiting the bond. Establish a bond that reflects total estimated reclamation costs for LSFO. The current National Bond of $5000, to cover tens of thousands of dollars reclamation costs, buys little in the oil patch these days. Provide a method that requires a company to remain responsible for completing reclamation and weed control on all its disturbed areas even after the company sells the lease to another company. Further, establish that surface reclamation has to be initiated by the company/operator within six months, and/or by the first growing season. Surface reclamation and weed control for abandoned and producing wells, access roads, and associated infrastructure need to be an ongoing process with viable progress and written documentation	See General Comment Response #34

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		every year.	
Energy and Minerals	Robert Killian	Conservation and fuel saving alternatives will reduce the importation of petroleum more than drilling.	See General Comment Response #5
Energy and Minerals	Robert H. King, Dr.	Rather than opening 93% of the Little Snake Resource Area to oil and gas development, the plan should adopt a balanced plan that preserves the social fabric and traditional lifestyles of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and landscapes. The plan should make utilization of best management practices and best available technology mandatory, including requiring directional drilling of multiple wells per pad to minimize surface impacts and fragmentation; and require continuous scientific monitoring to ensure that air and water quality standards are met.	See General Comment Response #1
Energy and Minerals	Robert H. King, Dr.	If the plan must allow leasing, it should require special, higher-value bonds on leases, as permitted by BLM regulations, based on the reasonable cost of restoration associated with the sensitive wildlife habitat in the area and the restoration standards in the RMP. We have too many affected areas at present on BLM lands in this and other areas that mineral leasers have abandoned and there are no funds for restoration. I personally have worked with acid mine drainage and hazardous unclosed abandoned underground uranium mines on BLM managed land. It is a very discouraging situation. Please don't let in continue.	See General Comment Response #34
Energy and Minerals	Kenneth Kreckel	The RMP 1 [and its main technical source, the RFD] projected the drilling of 3031 wells in the subject area, but this number falls far short of the 9436 new wells 2 calculated to fully develop currently recoverable resources. Note that this does not take into account any increase in recoverable reserves due to improved economics which, as we will see, have had a dramatic effect on drilling just in the past decade. With the surrounding areas undergoing a vast increase in drilling, the Little Snake will likely experience a similar increase over the time period of the study.	See General Comment Response #14
Energy and Minerals	Kenneth Kreckel	There is another indication that the RFD has underestimated the number of future wells in the area. An analysis of proposed activity in lands directly adjacent and partially including the Little Snake area reveals some interesting contradictions: BLM's proposed EIS for the Hiawatha area, located partially within the subject area in Colorado and outside of the subject area north into Wyoming, cites: "up to 4,208 new wells beyond the number of wells that currently exist	See General Comment Response #14

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		within the Hiawatha Project area. It is estimated that approximately two-thirds (2,805) of the potential wells could be located within the Wyoming portion of the project area and the remaining one-third (1,403) could be located within the Colorado portion of the project area." 3 Yet the Little Snake RFD only projects 225 wells for a much larger area of Colorado that includes. Hiawatha, Sugar Loaf, and Vermillion. 2 The factor of six disparity between a firm proposal by industry for Hiawatha [1403 wells] on one hand and the much smaller projection in the RFD [225 wells] casts considerable doubt on the conclusions voiced in the RFD. BLM has historically underestimated the pace and density of drilling needed for full field development, and this is an indication that the projections for drilling in the Little Snake area are similarly unrealistic. As discussed below, tight gas fields across the Rocky Mountain region have resulted in much higher densities of drilling than the BLM originally predicted.	
Energy and Minerals	Kenneth Kreckel	Still another reason to believe a much greater number of wells will be drilled in the Little Snake is the nature of the reservoirs themselves. Production from tight gas reservoirs tends to have hyperbolic declines, that is, an initial high rate that rapidly declines. Although the increased number of wells has resulted in a steady increase in daily production, that production, if drilling is halted, declines rapidly. Indeed, with these steep declines, a large number of wells must be drilled just to keep production at a given level. This effect contributes to the large increase in number of wells currently being drilled in the region, and will drive additional increases. One of the other factors driving the recent increase in gas well drilling is price. Over the last several years, the price of natural gas, responding to increasing demand and lowered supply, has increased dramatically. This has the effect of making gas wells that were uneconomic to drill as recently as the 1990's, to now be very profitable.	See General Comment Response #14
Energy and Minerals	Kenneth Kreckel	Although the Little Snake RFD mentioned the effect of rising oil and gas prices, it nevertheless may have underestimated its implications. In determining a reasonable number of future wells, the Little Snake RFD relied in part on projecting trends from historic data. Clearly, with continuing increases in demand [price] and a shrinking supply, it seems obvious that the rate of drilling can only increase, well beyond the trends cited in the RFD.	See General Comment Response #14
Energy and Minerals	Kenneth Kreckel	Extensive studies undertaken in tight gas fields such as Rulison in the Piceance and Jonah in the Green River Basin, pointed the way	See General Comment Response #13

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		for the need for very close well spacing to effectively drain the reservoir. Rather than 640 acre spacing, which had been common for natural gas wells, now wells were being drilled at spacings of 10, and even 5 acres. This has resulted in the permitting of very large well densities [one well per 10 to 20 acres) As a result, tight gas fields across the Rocky Mountain region are experiencing extensive _drilling programs. Fields are being infilled as well as extended using increasingly denser well spacings.) The producing areas surrounding the Little Snake area produce from many of the same tight gas reservoirs as the Little Snake: Wasatch, Fort Union, and the Mesaverde group, which includes the Lance, Lewis and Almond. Referring to Table 8 of the RFD (see Figure 5), the Sand Wash Basin and Vermillion Basins, which constitute a large portion of the overall Little Snake Area, even cite the densely drilled Jonah and Rulison fields as analogs (2). However, we have seen above, well spacing in those analog fields averages 10 acres, rather than the 40 acres projected for the Little Snake. Thus there is a reasonable expectation that gas drilling in the Little Snake will follow the same pattern, that of extremely dense well spacing. Rather than the spacings of 640 to 40 acres cited in the RFD, spacings of 5 to 20 acres are probable.	
Energy and Minerals	Kenneth Kreckel	Beyond these obvious disruption to surface, there are other impacts of this density of drilling. Among them are: • Increases in air pollution caused by emissions from vehicles, drill rigs, compressors and other engines, and dust caused by vehicular traffic; • The introduction of noxious weed species and invasive alien species; Ground and surface water pollution caused by hydraulic fracturing operations and the disposal of drilling fluids and produced water; • Noise and light pollution; Changes in the foraging behavior, breeding success, and migration patterns of wildlife; and • Aesthetic loss resulting from the industrialization of essentially wild or pastoral landscapes. It is important to note that the extremely dense spacing now utilized by industry multiplies these effects. In most infill developments, virtually all of the surface is impacted. In areas such as Jonah, which has seen spacing as tight as 5 acres, mitigation efforts have virtually no effect.	Impacts to air quality, vegetation, water resources, fish and wildlife resources, and other resources and resource uses are identified in chapter 4.
Energy and	Kenneth Kreckel	Due to the large number of possible wells, and more importantly, the	See General Comment Response #3

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Minerals		density of the projected developments, additional mitigation is necessary. One of the most effect ways of doing this, without reducing the amount of oil and gas developed, is the widespread application of a proven technology--directional drilling. This technology, by allowing the drilling of numerous wells from a single well pad, can dramatically reduce the number of well pads, and therefore, the undesirable impacts to the surface.	
Energy and Minerals	Kenneth Kreckel	Therefore, it is recommended that the BLM impose a requirement for maximum surface well spacing. Note this applies only to surface spacing, and is independent of downhole, or subsurface well spacing. One of the following two spacing rules should be established: At a minimum, 320 acre, or two well pads per section. This requirement is a logical extension of the already established 160 acre spacing in the Piceance Basin northwards into the Little Snake area. 2. One well pad per section (surface spacing near or at 640 acres). This would re-establish the drilling practices of the past decades. I will show it is feasible from a technical and economic standpoint There are several advantages to this proposal: 1. Maximum protections to the surface, while at the same time allowing full production of oil and gas 2. Facilities would be concentrated, allowing economies of scale. 3. Mitigation efforts would stay ahead of activity 4. Field development could proceed in an orderly fashion. Industry could plan well pads in advance, thereby reducing costs. Note that although these "rules" would establish the normal surface spacing, they could still be adjusted where industry shows them to be technically infeasible, using established BLM procedures.	See General Comment Response #42
Energy and Minerals	Kenneth Kreckel	Coalbed methane [CBM] developments are amenable to the recommended 160 acre spacing rule as well.	See General Comment Response #42
Energy and Minerals	Kenneth Kreckel	Reducing the number of surface locations will provide the most effective mitigation measure for the effects of oil and gas drilling. As has been shown, many tight gas developments, producing from reservoirs geologically very similar those existing in the Little Snake area, are currently being drilled at unprecedented dense spacing. This extremely close surface spacing has a major, unavoidable impact on the surface. The most effective means of mitigating	See General Comment Response #42

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		against this dense spacing is to limit the number of surface well pads.	
Energy and Minerals	Kenneth Kreckel	The establishment of the recommended surface spacing would have the following favorable effects: Drastic reduction in surface disturbance…For example, developing a gas field at 40 acre spacing results in the direct disturbance of 416 acres in every 640 acre section. [Using 26 acres per well estimated in the RFD and 16 wells per section.] 2 Drilling these same wells from well pads spaced at 160 acres reduces these numbers to 104-208 acres, depending on the size of the expanded well pad. This represents a reduction of 50 to 75%. Establishing one well pad per section for the 16 wells, reduces the impact to 26-52 acres, a reduction of 87 to 94%. Even if one changes the well pad assumptions, the magnitude [%] of the reduction in surface impact will remain similar. Note the above example can be accomplished within the 2500' horizontal reach of directional wells that has been determined as within industry capabilities by the BLM. Further, well pads comprising this number of wells, as well The following sections detail specific sections of the Little Snake RMP which call for reducing the surface impacts of oil and gas drilling. Please note the similarity of these with what can be accomplished with the establishment of a maximum surface spacing. These large magnitude reductions in surface impacts would have a corresponding reduction in cumulative impacts.	See General Comment Response #42
Energy and Minerals	Kenneth Kreckel	The establishment of the recommended surface spacing would have the following favorable effects: Achieve the RMP's recommendations regarding “footprint reduction.” On page 2-25 of the Little Snake RMP, under the preferred alternative, "footprint" reduction is to be encouraged for all surface disturbing activities. The following practices are cited to achieve this: • Reduce the long-term footprint of facilities to the smallest practical space. • Design and construct roads to minimize duplication of them. • Cluster development of roads, pipelines, electric lines, and other facilities, and use existing, combined corridors where possible. • Use directional drilling where biologically significant habitats are involved so as to minimize impact to grouse habitat, if such	See General Comment Response #37

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		techniques are technically feasible. • Minimize pad size and other facilities to the extent possible consistent with safety. Where directional drilling is occurring, larger pads are needed for multiple wells. • Minimize width of field surface roads. Avoid engineered and graveled roads when possible to reduce the footprint. Establishing a maximum allowed surface spacing standard would achieve the above goals.	
Energy and Minerals	Kenneth Kreckel	The establishment of the recommended surface spacing would have the following favorable effects: Provide desired protection for "Lands With Wilderness Characteristics Outside Existing WSAs ", and other areas, as set forth in the RMP. On page 2-49, there is a call for operators to provide a "strategy for limiting surface disturbance and impacts on the natural values of the area. The plan would demonstrate significant control of surface disturbance in a number of ways, including • Reducing surface spacing/density of facilities • Reducing road density/pipeline density • Focusing development near existing ROWs • Clustering facilities, including the use of directional drilling, where feasible • Reducing traffic through field road management, closing routes to public use, remote telemetry of wells, piping of produced fluids rather than trucking, etc. • Use of new technologies, including surface mats, self-contained rigs, limited impact drilling (e.g., small roads and small pads)" There are numerous references to the desirability of reducing surface impacts of oil and gas drilling to protect a specific features of the environment. Sections on wildlife, fragile soils, wilderness areas, and cultural resources all address forms of surface mitigation. The establishment of the recommended maximum surface spacing will favorably impact all of these concerns. All these could be accomplished with the establishment of the recommended maximum surface spacing.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance, maintaining consideration of this approach in the Final EIS. Imposing a surface spacing limitation can result in increased habitat fragmentation and is counter-productive to maintaining sagebrush habitat “sanctuaries,” which recent studies have shown are critical to greater sage-grouse and other sagebrush-obligate species. To develop a play, oil and gas operators would be forced to construct a well pad and associated roads and pipelines every 320 or 640 acres. This would result in a network of surface disturbance with oil and gas infrastructure on every square mile, with few large areas devoid of oil and gas-related disturbance. Sage-grouse studies have shown that birds could be affected by surface spacing of one well pad per 640 acres. Therefore, a network of well pads at such spacing could result in impacts to sage-grouse

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			throughout the entire development area. Through coordinating with CDOW, BLM developed a more appropriate strategy to reduce habitat fragmentation and promote large blocks of unfragmented habitat by limiting surface disturbance to a certain percentage of a lease or project area. Additionally, the operator would be required to illustrate strategy for reducing habitat fragmentation and leaving large blocks of sagebrush habitat undisturbed in a Plan of Development. Under this approach, the operator has the flexibility to cluster development in one area and leave adjacent areas undisturbed. Surface spacing limitations could be appropriate in some situations. BLM has the ability to require that well pads are spaced at a certain density at the activity level. However, mandating a spacing limitation could result in substantial habitat fragmentation. In addition, limiting surface spacing to one well pad per every 320 or 640 acres could result in a network of oil and gas infrastructure every square mile. If there were no current infrastructure in the area, new road and pipeline rights-of-way would need to be constructed, which would result in an increase in surface disturbance and habitat fragmentation. A network of roads leading to a well pad every square mile would increase traffic and other activity, which would impact wildlife. A surface spacing limitation could also prohibit clustering well pads in one area.
Energy and Minerals	Kenneth Kreckel	The establishment of the recommended surface spacing would have the following favorable effects: Provide clear and timely standards Establishment of these surface spacing recommendations would provide clear spacing rules up front, thereby: 1. Promoting proper planning of development 2. Streamlined approvals for APDs 3. Prevention of undesirably dense developments 4. Allowing regulators to `stay ahead' of proposed developments 5. Fair, even, across the board standards which apply to all.	BLM believes a surface disturbance threshold with a requirement to illustrate a strategy for reducing habitat fragmentation is more beneficial to resource values than a surface spacing limitation, which could result in increased habitat fragmentation. The sagebrush protection approach outlined in Section 2.5.5.2 describes that a Plan of Development (POD) would be required to opt into this incentive-based approach for existing leases and would be required for new leases in high and medium priority sagebrush habitats. A POD, which contains a long-term drilling plan, allows the operator and BLM to plan development in advance and better analyze and

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			mitigate for cumulative effects. Requiring a POD would also result in streamlined approvals of APDs.
Energy and Minerals	Kenneth Kreckel	The establishment of the recommended surface spacing would have the following favorable effects: Continue current drilling practices from adjacent areas It has been shown that directional drilling from well pads of this recommended spacing is technically feasible and economically viable. Developments utilizing this spacing have been applied to other geologically similar developments in areas directly adjacent to the Little Snake area, such as the Roan Plateau in the Piceance Basin, and fields in the Green	See General Comment Response #3
Energy and Minerals	Kenneth Kreckel	Therefore it is recommended the BLM add a maximum surface spacing requirement to the Little Snake RMP. 1. 320 acre, or two well pads per section. This requirement is a logical and feasible extension of the maximum surface spacing in the Piceance Basin northwards into the Little Snake area. It would continue BLM's already established policy. 2. Where appropriate, 640 acre, or one well pad per section. This would re-establish the drilling practices of the past decades. Adoption of these recommendations would significantly decrease the impacts of drilling in the Little Snake area, without limiting the amount of natural gas produced.	See General Comment Response #13
Energy and Minerals	Chad Kurtenbach	In regards to oil and gas uses I would hope that the number of wells and access roads would be kept to the absolute minimum. I also feel the access should be controlled, especially during the winter month for big game security purposes. I do not support the recent petroleum boom and the effects it is having on lands throughout the west but do recognize there is probably much bigger players than the BLM driving it. I only hope that the impacts can be minimized and will support the BLM in any effort to make the petroleum extraction environmentally friendly.	See General Comment Response #1
Energy and Minerals	Keith Larochelle	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	Pete Leiterman	I wish to voice my concern regarding the management plan the BLM is developing for the Little Snake Resource Area. This area is home to abundant wildlife and should be kept that way. This is no place for the drilling of oil and gas. I urge the BLM to adopt the "alternative D"	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for

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		management plan to preserve the area and its wildlife for the future.	mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Christopher Lish	With heavy-handed oil and gas development encroaching on the resource area from all sides - including an additional 4,200 proposed gas wells spanning across the Wyoming border into the Little Snake's Hiawatha area - the importance of protecting these remaining undisturbed lands cannot be overstated. We can learn much from recently conducted research on the devastating effects of aggressive oil and gas development in neighboring states. For instance, in Pinedale, Wyoming, scientists found that mule deer herds declined to almost half their previous size in the first four years of gas development. Pronghorn, elk and sage grouse all face similar risks.	See General Comment Response #1
Energy and Minerals	Jennifer Lowe	Opening 93% of the area to oil and gas drilling is not only an unbalanced approach, but also sacrifices the landscape for future generations. The BLM's final plan should place some areas off-limits to drilling and ensure that any energy development in the area is done in steps to limit the negative impacts to air, water, and wildlife.	See General Comment Response #1
Energy and Minerals	Leslie Malcolmson	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Lisa Maragon	Rather than opening 93% of the Little Snake Resource Area to oil and gas development, please adopt a balanced plan that protects the local communities, the air, precious water and open landscapes. Please move beyond "voluntary oil and gas limitations" in draft plan towards real, on the ground habitat protection with mandatory disturbance restrictions for essential breeding grounds, winter	See General Comment Response #1

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		ranges, and linkages for sage-grouse and big game native species that are critical to the vitality and character of the area.	
Energy and Minerals	Suzanne Marienau	Fossil fuels are not the way of the future. America's vast farmlands will produce fuels that are environmental friendly and free from ties to unstable governments overseas. We must continue to pursue these and other avenues of energy rather than destroy wildlife habitats and wild areas in search of environmental unfriendly fossil fuels which will run out soon enough.	See General Comment Response #5
Energy and Minerals	Marianna McKim	It is fitting that some land be opened to industrialization, but certain wild corners of the United States deserve preservation and protection. Little Snake is one of the latter. In case any oil and gas activity is approved, it should be restricted to one well per 640 acres and be required to adhere to best management practices. It is essential that any permitted activities be regulated to protect wildlife habitat, air and water quality, and human health.	See General Comment Response #1
Energy and Minerals	Lea McLaughlin	Northwest Colorado is one of the most beautiful places in America. Please preserve this wonderful place. Oil/gas drilling will destroy the environment.	See General Comment Response #1
Energy and Minerals	Jim Messing	I do not want to restrict oil and gas exploration, given our dependence on foreign oil supplies.	See General Comment Response #8
Energy and Minerals	Lisa Milatovich	I really wish this whole administration would get off the oil drilling madness and realize it doesn't work. All it accomplishes is forever ruining lands and wildlife not to mention our air and water that we cannot live without! Please use the resources and technology you have and use it towards making and using renewable energy. Our past is the best indicator that what we have been doing does not work and only ends up destroying irreplaceable environments. Learn from our past and do better for our futures!	See General Comment Response #5
Energy and Minerals	Moffat County Commissioners	p. ES-11 - Minerals Moffat County recommends a statement be added here and on p. 2-55 Energy and Minerals, that highlights the BLM Area Manager will request a significant increase in reclamation bonding for companies that are conducting new, unproven development techniques as well as companies who do not have solid reputation for conducting reclamation. Although we know this authority currently exists, we request clarification in the RMP.	See General Comment Response #34
Energy and Minerals	Moffat County Commissioners	p. 2-4 Phased Leasing of Vermillion Although Moffat County supports this alternative being eliminated,	The section on phased leasing as an alternative considered, but eliminated from detailed study has

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		we request BLM define or described what is meant by Phased Leasing under this scenario. Our request is based on the fact that some suggest the preferred Vermillion Basin Alternative is a phased leasing alternative. It is crucial to clarify what Phased Leasing is.	been removed from the Proposed RMP/Final EIS, as the consideration of a 1% disturbance ceiling in Vermillion Basin is a type of phased leasing (considered under Alternative C in the Draft RMP/EIS and under Alternative B in the Proposed MRP/Final EIS).
Energy and Minerals	Moffat County Commissioners	p. 2-55 Energy and Minerals Moffat County recommends a statement be added here and on p. ES-11, Minerals, that highlights the BLM Area Manager will request a significant increase in reclamation bonding for companies that are conducting new, unproven development techniques as well as companies who do not have solid reputation for conducting reclamation. Although we know this authority currently exists, we request clarification in the RMP.	See General Comment Response #34
Energy and Minerals	Moffat County Commissioners	p.2-56 Oil and Gas Leasing Decisions Tables 2-10, 2-11, 2-12, and 2-13 mislead the reader to think stipulations are mandatory. Moffat County recommends placing a note at the front of each of these tables to reflect that stipulations can be waived by following the Adaptive Criteria in Appendix M. Typo in each of the alternatives. 'Appendix E' needs to be replaced with 'Appendix M.'	Text under the “Oil and Gas Leasing Decisions” heading on page 2-56 states that exceptions, modifications, and waivers, could be applied to oil and gas leasing stipulations as detailed in Appendix E. This appendix outlines the criteria to apply exceptions, modifications, and waivers.
Energy and Minerals	Moffat County Commissioners	p.2-57 Closed to Oil and Gas Leasing Moffat County has repeatedly commented that removing oil and gas leasing from Dinosaur North and Cold Springs is a 'withdrawal' not a mere 'deferral for the life of the RMP' as BLM claims. 'Withdrawals' must be reported to congress with justification. Moffat County believes BLM is not acting according to mandates regarding this topic. (See attached legal brief.)	See General Comment Response #35
Energy and Minerals	Moffat County Commissioners	P.2-69 Locatable Minerals… Alternative C dictates 'withdrawal' of mineral location in Irish Canyon, Little Yampa Canyon SRMA, Limestone Ridge, Cold Springs Mountain, and Dinosaur North. Moffat County opposes these withdrawals and requests if they continue through the final, they be reported to congress as a 'withdrawal' without the support of the cooperating agencies.	BLM acknowledges Moffat County’s opposition to one of the alternatives considered in the Draft RMP/EIS. After the Record of Decision is signed, any recommendations for withdrawal from mineral entry will need to be formally processed. BLM will follow the regulations and policies for finalizing recommended withdrawals.
Energy and Minerals	Moffat County Commissioners	p. 2-75 Uranium (not in RMP) Moffat County recommends addressing Uranium. If Oil Shale warranted a small section, for no more potential than is known in Moffat County, Uranium should have the same mention since at	Uranium is considered a locatable mineral and is addressed by the actions described on pages 2-69 to 2-70 and 2-170 to 2-171. The description of the current uranium mining activities is on pages 3-107

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		least 2 townships in Moffat County have been leased and staked in the last year.	and 3-108 states that there are currently no mining activities in the RMPPA though uranium mining did occur in the Maybell-Lay-Juniper Springs region in the central part of Moffat County and the Fish Creek District in the east central part of Routt County.
Energy and Minerals	Moffat County Commissioners	p. 3-107 Uranium Incorporate this language into p. 2-75 where Uranium discussion is missing.	Uranium is considered a locatable mineral and is addressed by the actions described on pages 2-69 to 2-70 and 2-170 to 2-171. A description of the current uranium mining activities is on pages 3-107 and 3-108.
Energy and Minerals	Moffat County Commissioners	All of the counties in Utah, Colorado and Wyoming have objected to BLM's relatively recent practice (since 2000) of closing public lands to oil and gas leasing as a planning decision rather than following the secretarial withdrawal procedures found in §204 of FLPMA. Moffat County argued that BLM cannot unilaterally close thousands of acres of public lands to oil and gas leasing (i.e., Dinosaur Adjacents and Cold Springs Mountain) without following FLPMA's Section 204 withdrawal procedures. BLM responds that closing an area to oil and gas leasing does not constitute withdrawing it from mineral development, because it is only a discretionary deferral of leasing for the life of the plan. Thus, according to BLM, the withdrawal procedures outlined in FLPMA do not apply to the decision to not lease these defined areas of public land.	See General Comment Response #35
Energy and Minerals	Marla Morris	I have had the experience of driving south from Craig to Rifle. I am saddened by the devastation of the landscape from oil and gas development as I get closer to Rifle. I don't know if this oil and gas development is public or private, but I would hate to witness the scale of such oil and gas development in Moffat County, especially on our public lands. Please approve a balanced multi-use plan for all of the Little Snake Resource Area.	See General Comment Response #1
Energy and Minerals	David & Tresa Moulton	According to analysis of U.S. Geological Survey (USGS) data done by the Wilderness Society, the entire LSRA contain less than a year's worth of technically recoverable natural gas and a little over 3 hours' worth of oil based on current U.S. consumption; the percentage of these resources that are economically recoverable will be considerably less. Although current U.S. energy policy encourages development of domestic resources, the paltry amount of gas and oil that might be extracted from this uniquely beautiful and fragile area is not worth the degradation to the environment that such extraction would cause.	See General Comment Response #1
Energy and	David & Tresa	Opening 93 percent of the LSRA to oil and gas development as	See General Comment Response #1

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Minerals	Moulton	called for in the draft RMP is not a balanced approach. The final management plan should preserve the wild, open landscapes of the region by pacing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to air, water, and wildlife habitat.	
Energy and Minerals	David & Tresa Moulton	Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well pad per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Lucas Nave	We need energy independence, but extracting mineral energy resources from culturally and biologically significant locations is not necessary. We have the technology and environmental conditions to support a large proportion of our energy needs through wind and solar power, and these energy generation techniques need not take place in such sensitive areas as the Little Snake Resource Area. If oil and gas drilling are allowed to take place in the area, these mineral resources will become exhausted and the ecological integrity of the area will be compromised.	See General Comment Response #5
Energy and Minerals	Jill Nichols	- EVICT ALL OIL COMPANIES FROM THE LAND MY TAXES BOUGHT & MAINTAIN. THEY SHOULD HAVE TO DRILL ON THEIR OWN LAND.	See General Comment Response #1
Energy and Minerals	Thomas Novitsky	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	NW Colorado Oil and Gas Association	2.5 1.2 Page 8-Management Actions Alternative C (Preferred Alternative) Same as described in Alternative B. The use of “green” or flare less well completions as a best management practice is too restrictive and some Operators are technically incapable of completing wells in this manner. Flare less completions require pipeline quality gas that is put directly to production. Since the 5% disturbance plan requires mandatory acceptance of BMPs, the Operators that are incapable of meeting this BMP cannot participate in that plan. As with other BMPs, the use of flare less completions will only be required when economically and technically feasible (recommended change.) p. 2-17 Remove the line referencing a 160 acre spacing for one facility (recommended change). There is flexibility in the manner in which the 5% disturbance of the lease can be managed and one facility per 160 acres is just one example. We recognize the next	See General Comment Response #2

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		sentence states the “intent” is not to require that the spacing be 160 acres, but it allows for the perception of 160 acre surface spacing instead of clustering or development in other ways to maintain the 5% disturbance level of a lease, unit or development area.	
Energy and Minerals	NW Colorado Oil and Gas Association	P2-56, 2-57-Adaptive Management is at the forefront of this plan. In each column of the tables there should be a statement that stipulations can be waived or exempted if adaptive management is followed in Appendix M.	Exemptions, modifications, and waivers for oil and gas leasing stipulations could be provided as detailed in Appendix E. Nothing in the Draft RMP/EIS, including application of adaptive management principles, places a greater than normal emphasis on the using such measures.
Energy and Minerals	Gwynn O’Gara	Go solar! We are running out of land to drill and destroy, and the abuse of this magnificent specimen is not necessary. Be a leader. Support new, non-invasive, non-polluting energies.	See General Comment Response #5
Energy and Minerals	Edward J. Palma	How about promoting a plan for Conservation and the development and use of Renewable Technologies (Solar PV, Solar Thermal, Solar Hot Water, Wind and Biomass)? Why are we not promoting Zero Net Energy Buildings and Residences, so we do not have to use more Fossil Fuels? When did we forget that we are supposed to be good stewards of our environment, and that we are not the only inhabitants of the Earth? Sustainability includes all living things. As we are supposed to be the most intelligent species, when are we going to act like the most intelligent species? Our pristine areas and all of the wildlife that they support are our treasures and should remain pristine and untouched. They are key to our fight to combat Global Warming and the impending Climate Crisis that we face. The animals do not get to voice their discontent and make choices. If they did they would ask that we make responsible decisions to protect our pristine areas and promote the sustainability of our environment for the future of all living things. Please reconsider this decision and ban all oil and gas exploration and drilling, and unnecessary logging and road building in these areas.	See General Comment Response #5
Energy and Minerals	Richard Partridge	It is time that our country's heavy dependence on fossil fuels, such as oil and natural gas, comes to an end. The focus needs to turn to renewable, environmentally-friendly sources of energy. The future of our nation, the planet and yes, human civilization, depend on this change.	See General Comment Response #5
Energy and Minerals	Teresa Pollard	- Limit oil and gas impacts period.	See General Comment Response #1
Energy and Minerals	Teresa Pollard	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced	See General Comment Response #1

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		approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	
Energy and Minerals	Julie Pruyne	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	Public Lands Advocacy	The DEIS states on page 4-152: "If oil and gas operators were to keep surface disturbance to less than 5 percent and provide a POD, BLM would grant an exception to wildlife timing stipulations. Lifting timing limitation stipulations on oil and gas leasing would not restrict the time available to complete exploration and development activities." On Page 2-18, it is stated: "Although the 5 percent surface disturbance threshold is the guiding factor, spacing of oil and gas facilities on the surface is also an important concept in limiting habitat fragmentation. If it is assumed that each facility occupies 8 acres, this is equivalent to disturbing 5 percent of a 160-acre block. The intent is not to require 160-acre spacing but to average no more than one facility for each 160 acres within a project area while leaving large blocks of habitat undisturbed." On Page 2-16, it is stated: "To maintain and improve large blocks of functional sagebrush communities, oil and gas operators could opt into an agreement to limit habitat fragmentation in return for easing timing limitation stipulations and allowing year-round drilling. This arrangement applies to the most critical sagebrush habitat within the RMPPA, which includes all areas located within 4 miles of a sage-grouse lek site and eight designated large patches of sagebrush habitat (Map 2-4). The 4-mile radius areas are based on known sage-grouse lek sites, but are intended to be flexible in the RMP so that new sites discovered during the life of the RMP will also be included." PLA recognizes that the surface disturbance limitation of 5 percent was designed to accommodate year-round drilling while protecting sage grouse habitat. We support the attempt to arrive at a mutually agreeable solution to this issue. However, several concerns have arisen regarding implementation of this approach. • This 5 percent threshold was based upon limiting well spacing to 160 acres. However, well spacing cannot typically be based upon	The 5% rule does not dictate 160-acre spacing, either on the surface or downhole. It is feasible to concentrate or clump wells and facilities and then drill directionally to develop the resource. For existing leases, this approach is voluntary. Therefore, existing operations would not be required to meet this threshold unless the operator chose to opt into this agreement with BLM.

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		surface resource concerns. Spacing is determined by the Colorado Oil and Gas Conservation Commission and is based upon the number of wells needed to recover the resource. While BLM and others may believe a company can employ directional drilling technology as a means of avoiding surface downspacing, the use of this technology is governed by geological feasibility and economic considerations. It also requires larger drill pads. Therefore, it may be impossible for an operator to fully develop the resource and adhere to the 5 percent limit. • We understand that disturbances associated with oil and gas operations count toward this limitation, including well pads, roads, pipelines, exploration and production facilities, and all other infrastructure; however, it is stated that disturbed areas adjacent to facilities, not just the facility or well pad itself, will also count toward the threshold. BLM needs to clarify this statement since additional disturbance adjacent to facilities is not defined. • If BLM works closely with operators regarding their development plans, it is more than likely that larger blocks of sage brush habitat could be retained without resorting to a strict 5 percent threshold. Utilization of best management practices as well as other means, such as the compensatory offsite mitigation to which BLM referred, could allow BLM to meet its habitat goals while retaining a larger degree of flexibility to accommodate the recovery of oil and gas. • BLM has stated that existing operations would also be required to meet this threshold. If operations have exceeded this limit, the operator must strive for “no net gain” in disturbance. This limitation should not be applied to existing fields because it would result in even greater restrictions being placed on existing operations. It would make more sense to allow additional activities to occur in areas that have already been disturbed because many impacts would be confined to areas already developed. • Prohibiting continued development until acreage is reclaimed to achieve the 5 percent threshold is a form of phased development which the Little Snake Field Office has indicated in the DEIS it does not support.	
Energy and Minerals	Public Lands Advocacy	BLM has stated that it plans to put up the entire leaseable area of Vermillion for lease all at once with leases no larger than 2,560 acres. Moreover, before exploration could occur, a unit with at least four leases would be required. Unitization is not intended for use as a mitigation tool even though it may have mitigation benefits. The purpose of unitization is to	Were BLM to adopt the 1% disturbance ceiling and unitization stipulations, BLM would facilitate unitization because this approach would be included in the ROD and required as either a lease stipulation or a COA. With the unitization requirement in the ROD, BLM would be able to help ensure that all parties join the unit by using orders of the authorized

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		prevent waste by being able to explore and develop a reservoir based upon scientific geologic factors rather than leasehold boundaries. We are concerned that unitization for exploration wells may be difficult to achieve in many cases because an operator must obtain agreement of all other area operators to join the unit, a process that is labor intensive and not facilitated by BLM. If BLM intends to require a proponent to form a unit, we urge BLM to help ensure that all parties join the unit and that all subsequent APDs are issued in a timely manner in order to protect the rights of the unit owners. If BLM intends to use unitization for the sole purpose of limiting surface disturbance, BLM must ensure that all the objectives of unitization as outlined in the BLM Unitization Handbook are met, such as timely exploration and production of all committed lands. Expecting operators to lease more lands if they are running up against the 1 percent threshold is illogical for a number of reasons. First, actually obtaining a lease will likely prove difficult. It is currently common practice for opponents of oil and gas leasing and development to protest and appeal lease sales. Given the controversy surrounding Vermillion, all leases are likely to be protested and appealed, which is a lengthy process. Second, since Vermillion is essentially a “wildcat” area, companies would need to ensure there are producible resources before they would consider purchasing new leases. Without such assurances, Vermillion Basin will remain undeveloped. PLA recommends that BLM incorporate flexibility into its management of Vermillion Basin, taking into account potential problems with respect to leasing, unitization, and development.	officer if necessary. BLM expects to be able to timely process leasing Expressions of Interest given a new EIS/ROD. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance.
Energy and Minerals	Questar, Rockies Region	2. Year-Round Drilling: Alternative C of the DEIS identifies an option whereby operators could opt into an agreement to limit habitat fragmentation in return for easing timing limitation stipulations and allowing year-round drilling ("Year-round Option"). Questar appreciates the fact that LSFO considered an option such as this but would like the requirements of the Year-round Option to be further clarified in the Final EIS. BLM has indicated to Questar that the 160-acre surface spacing restriction mentioned in Section 2.5.5.2 was included simply to explain the plan and is not a restriction. However, Questar is concerned that the language may be interpreted as a requirement of only one well pad per 160 acres which would inhibit development of existing leases. Such an interpretation would also interfere with the jurisdiction of the Colorado Oil and Gas Conservation Commission to determine proper spacing of wells for orderly development of the oil and gas and prevention of waste. See	BLM does not intend to limit surface spacing. The DEIS clearly states that, “The intent is not to require 160-acre spacing.” The 160-acre spacing references are merely used to illustrate how BLM arrived at the 5% figure. No reference to surface spacing will appear on the lease stipulation. Participation in the sagebrush protection approach for existing leases is voluntary. If an operator found it too difficult to abide by the “no net gain” principle, they would not have to opt into the approach and could request an exception to timing limitations through normal Exception/Waiver/Modification procedures. However, the Proposed RMP/Final EIS would mandate surface disturbance limitations for new leases. The surface disturbance limitations

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		C.R.S. § 34-60-101, et seq. The Year-round Option requires that existing disturbance be included in the 5% disturbance limitation. Much of Questar's lease holdings in the RMP area are located within existing, developed fields that date back 80 years to 1927 with disturbance very close to or already above 5%. In cases such as these, the Year-round Option would adopt a "no net gain" requirement whereby no additional development would be allowed until disturbance had been lowered to 5% through reclamation. Delaying development in these areas until reclamation is achieved on sufficient acreage to bring disturbance below the 5% level could leave reserves undeveloped which is contrary to the Energy Policy Act of 2005. When fully contemplated, this retro-active disturbance clause will actually cause currently inactive or less active areas to be less encumbered with surface use limitations and therefore naturally more attractive for development. This is counter to the fact that it is beneficial to all interested parties to develop in areas where disturbance and infrastructure already exist. Therefore, Questar proposes to apply surface disturbance percentage limits to new activity only, whether the activity occurs in pre-disturbed or new areas. The DEIS notes on page 4-211 that much of the land that would be put under the new stipulations and designations is already leased and, with some exceptions, would not be subject to the new restrictions. It is important to note that the majority of Questar's leases in this area date back to the 1920's and do not contain seasonal stipulations of any kind. Nevertheless, Questar is committed to responsible development and has voluntarily adhered to the current seasonal time restrictions in the Hiawatha Area. Our experiences in other areas prompted us to submit a proposal to BLM in 2006 for development in northwest Colorado and southwest Wyoming which we feel will be more beneficial to wildlife in the area. BLM is currently evaluating Questar's Hiawatha Regional Energy Development Project (HREDP) proposal which encompasses our operations in the Little Snake RMP area and also utilizes year-round development. To address habitat fragmentation, Questar has proposed development confined within Focus Areas and commits to rapid reclamation. This plan will result in disturbance from new activity averaging less than 5% of the total area after reclamation. Questar is evaluating whether our HREDP proposal and the Year-round Option in Alternative C can be compatible. The ability to propose a specific project area and size in the Year-round Option would seem to be workable. We will continue to evaluate and to	would remain voluntary for existing leases. From a habitat standpoint, there is no difference between existing and new disturbance. BLM believes it is important to be consistent in determining what level of development is appropriate for important sagebrush habitats. Therefore, in addition to new disturbance, existing disturbance is also considered. Regarding BLM retaining the flexibility to review alternate development proposals outside of the sagebrush protection approach outlined in the Draft, BLM retains its ability to grant exceptions, waivers, and modifications through normal procedures. BLM would still be able entertain alternate year-round development proposals or other proposals that limit habitat fragmentation. Language has been added to the Proposed RMP/Final EIS to clarify that “year-round drilling” includes drilling, completion and construction activities. Appendix O contains reclamation standards to be used in the sagebrush protection approach. When an area meets this standard, those acres removed from the total number of disturbed acres in the project area.

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		adapt our proposal where possible. However, we recommend that BLM retain the flexibility to review and approve alternate development proposals that may not strictly adhere to the Year-round Option as described on page 2-16 through 2-19 of the DEIS. Since not all fields can be developed in the same manner, a "blanket" plan for all types of development may not be feasible to allow for full recovery of the resource in some areas. The RMP must be flexible enough to allow alternate year-round development proposals to be developed that will meet the objectives outlined in the DEIS and still allow for multiple use of federal land. Recommendation: • Clarify that the Year-round Option will be voluntary on both old and new leases. • Clarify that the option does not limit development to one well pad per 160 acres. • Apply surface disturbance percentage limits to new disturbance only. • Clarify that operators are opting into an agreement to allow year-round development (drilling, completions, and construction) and not just year-round drilling. • Allow flexibility by including language that BLM can approve alternate year-round development proposals that also limit habitat fragmentation. • Include definition of successful reclamation for the purpose of crediting towards new disturbance.	
Energy and Minerals	Questar, Rockies Region	3. Best Management Practices – BMPs: Instruction Memorandum 2007-021 states that BLM Field Offices are to work with Operators early to determine how BMPs may fit into development proposals and how BMPs can be implemented with the least economic impact to the Operator. BMPs are also to be implemented on a case-by-case basis rather than prescriptively as is indicated on page 2-133 in the Greater Sage-grouse section. BMP implementation must consider economic feasibility as well as technical feasibility. The DEIS, in section 2.5.1.2, proposes to add "green" or flareless completions to the list of Best Management Practices (BMPs) used by the BLM. The BLM should consider that some wells cannot be completed using flareless technology. Use of flareless technology is simply not feasible in some cases due to natural geologic conditions and/or compatible with highly practiced and effective completion techniques. Examples of an operator's inability to utilize flareless	See General Comment Response #2

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		completion equipment would be where reservoir pressures are not adequate to initially flow at a pressure exceeding pipeline pressure, when inert gasses are used in fracturing fluids, and where exploration wells are testing and have not yet justified a pipeline connection. It should be noted that Questar uses flareless completions in all areas of operations where technically and economically feasible, including certain locations within the LSFO. The year-round drilling option and any development within the Vermillion Basin requires mandatory acceptance of all BMPs, and flareless completions are simply not technically feasible in many areas. Questar supports using BMPs on a case-by-case basis where economically and technologically feasible, rather than making them mandatory. Directional drilling is another BMP that could be required, but economic and technical feasibility must be analyzed prior to recommending its use. At this point in time, the recoverable reserves per well and incremental cost associated with directional drilling would prevent the development of the deeper Baxter through Dakota reservoirs on Questar's leasehold within the LSFO, potentially stranding in place significant amounts of the natural gas resources in Northwestern Colorado. In addition, some areas within the LSFO have the unique geologic benefit of both shallow and deep formations that can be produced together, or commingled, in one wellbore. Commingling would allow for a 50% reduction in well numbers and facilities and would make it a more attractive alternative than directional drilling. Recommendation: Questar requests that the wording in the DEIS, specifically in the Year-round Option, more clearly identify that implementation of BMPs will be discussed between the BLM and Operators to ensure the economic and technologic feasibility is taken into account and that alternate ways to meet objectives are considered. Clarify that not all BMPs will be required, but only those that are feasible for a given area/play and meet the objectives will be considered on a case-by-case basis.	
Energy and Minerals	Questar, Rockies Region	Recommendation: BLM should make clear in the document that the application and overlaying of seasonal restrictions, NSO and CSU areas and ROW exclusions will have a direct affect on energy resources available to America and on the prices Americans will pay for energy. The RMP must clearly state that BLM has the ongoing ability to issue waivers and exceptions to, as well as to modify seasonal stipulations.	See General Comment Response #2
Energy and	Questar,	Questar appreciates the thought BLM has given to the controversial	Alternative C in the Proposed RMP/Final EIS was

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Minerals	Rockies Region	subject of leasing within the Vermillion Basin. BLM has produced an innovative solution for this unleased area which provides protections for the natural and scenic values (p. 2-65, 2-158) while allowing some exploratory drilling. In the near term, this solution may prove to be workable; however, the RMP must allow for revisions to the Vermillion plan through adaptive management. The 1% surface disturbance limitation is arbitrary and may unnecessarily restrict oil and gas development operations. Indeed, Questar is unaware of any other RMP that has adopted such a low arbitrary limitation. Since there is no precedent for such a plan, and no basis for determining whether such a restrictive plan can be successful, Operators will need assurance that the plan can and will be modified if the unitization theory is not feasible or if development in the area determines that the stringent 1% limitation will not permit full resource recovery. The unitization requirements raise serious concerns. Due to the nature of units and the manner in which they are formed, there are many circumstances where unit formation could not occur. Since the current plan requires unit formation before development can occur, Operators will need assurance that leases can be developed even if unit formation is not possible. Recommendation: BLM should include language in the Vermillion Basin Plan that development will be reviewed at least annually and changes to the plan can be implemented based on new information. BLM should clarify that the 1% surface disturbance limitation is a guideline only and that BLM will continue to monitor the area to determine if development objectives are being met. Further, the RMP must allow for alternate means for development to occur if unit formation is not possible.	revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance, maintaining consideration of this approach in the Final EIS. Although BLM has implemented similar 1% surface disturbance limitations in land use plans (such as the Roan Plateau RMP amendment), precedent is not required. BLM has the authority to stipulate a surface disturbance threshold on new leases. The unitization requirement would be included in the ROD and required as either a lease stipulation or a COA. The 1% limitation is based upon protection of resource values and as outlined in the Lands with Wilderness Characteristics Outside WSAs section for Alternative B in chapter 2. We recognize that approach would limit, or even preclude the development of some of the oil and gas resources in a lease. BLM has not identified any exceptions to the unitization requirement.
Energy and Minerals	Questar, Rockies Region	Page 2-25,2-134, Section 2.5.6.2: Requirement for directional drilling where biologically significant habitats exist. Clarify that this will only be required where directional drilling is economically and technologically feasible.	See General Comment Response #2
Energy and Minerals	Questar, Rockies Region	Page 2-133, Section 2.8: References to BMPs should include consideration of technical and economic feasibility of implementation, as well as implementation on a case-by-case basis as applicable and through coordination with Operators.	See General Comment Response #2
Energy and Minerals	Questar, Rockies Region	Page 2-133, Section 2.8: BMPs are applied if surface disturbance reaches 10% of the nesting habitat within a 4.0-mile radius of an active lek and that new BMPs could be added. This should be revised to indicate that only appropriate and economically and	See General Comment Response #2

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		technically feasible BMPs would be applied.	
Energy and Minerals	Questar, Rockies Region	Page 2-136, Section 2.8: Compensation and operational plans would be developed for oil and gas field development in the Little Snake black-footed ferret management area. The document does not indicate where this management area is located. The existing MOU indicated no impact to oil and gas.	The Proposed RMP/Final EIS was modified to address this comment.
Energy and Minerals	Questar, Rockies Region	Page 4-225, Section 4.6.2: The description of the HREDP on this page should note that Questar is proposing year-round development.	It is not necessary to include specific details of Questar's proposal for the HREDP in the cumulative analysis. Aspects of the operator's proposed action may not carry through to the Record of Decision and implementation.
Energy and Minerals	Questar, Rockies Region	Vol. 2 H-5: The first paragraph contains a sentence stating that "deep" wells can recover from larger areas which is not completely true. Drainage areas are dictated by reservoir permeability and porosity, and in the case of the "deeper" Baxter, Frontier, and Dakota formations present in northwest Colorado the drainage areas are typically smaller than the shallower Mesa Verde formation.	Appendix H describes oil and gas operations in general terms. The language referenced by the commenter merely provides a hypothetical example. This paragraph essentially outlines examples for cases where spacing would range from 40 to 640 acres. It does not set any hard and fast rules for spacing.
Energy and Minerals	Questar, Rockies Region	Vol. 2 H-6: A reference to the "Gold Book" should be included during the discussion of access roads for exploratory drilling.	The Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development (The Gold Book) would be implemented whether or not it is called out in the RMP. As a general rule policies, programmatic direction and standard operating procedures are not included in the RMP, as they are able to be implemented without needing direction in the RMP.
Energy and Minerals	Questar, Rockies Region	Vol. 2 H-8: The first paragraph refers to a mud motor as having a turbine driven motor which is incorrect. A mud motor is actually a moineau pump run in reverse. It is a positive displacement pump.	The Proposed RMP/Final EIS has been revised as suggested by the commenter.
Energy and Minerals	Questar, Rockies Region	Vol. 2 H-11: Plunger lifts use natural pressure, not natural flow.	The Proposed RMP/Final EIS has been revised as suggested by the commenter.
Energy and Minerals	Dorothy Raasch	I strongly object to leasing any of the lands in the Little Snake area for Oil and Gas development. Your efforts should be directed to encouraging less dependence on these energy sources. Please do what is best for the land, not the Big Oil Companies. Once these special places are raped, they will never recover their former beauty and wildlife habitat	See General Comment Response #1
Energy and Minerals	Becky Raney	Alternative C should not be too restrictive regarding the use of "green" or flare less well completions as a BMP.	See General Comment Response #2

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Energy and Minerals	Shelley Reid	Instead of attempting to squeeze the last of the fossil fuels out American soil, why aren't we insisting that our citizens (and that includes our corporate citizens) use what we have more efficiently, and why aren't we exploiting and developing carbon-neutral renewable energy sources, such as solar and wind power?	See General Comment Response #5
Energy and Minerals	Allan Reishus	After considerable review, discussion with a number of persons involved in the RMP process and attending several public meetings I feel that: -generally the plan is good from my point of view as an environmentalist and outdoor recreationalist -the one glaring weakness I see is an inadequate bonding requirement for oil and gas operators. I feel the dollar amount should be sufficient to complete rehabilitation and reclamation of the land anytime in coming decades should the operator fail to do so. The taxpayers of the future should not have to fund reclamation and citizens should not have to look at scattered old drilling structures for years after the operator has disappeared. Please pursue more stringent and equitable bonding.	See General Comment Response #34
Energy and Minerals	Karen Roberts	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Karen Roberts	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat	See General Comment Response #1
Energy and Minerals	Jim & Liz Robinson	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Rocky Mountain Recreation Initiative	We urge you to change the current recommendation to open 93% of the resource area to oil and gas. BLM lands are "multiple use lands" not single use lands. This degree of oil and gas leasing will preempt all the other values offered by the LSRA including wildlife, hunting, recreation, the natural environment and all the local businesses dependent on these resources.	See General Comment Response #1

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Energy and Minerals	Ana Salinas	2)in areas where drilling is permitted, cap surface disturbance at one well per 640 acres in directional drilling only	See General Comment Response #13
Energy and Minerals	Rebecca Schneider	It is time to get past the constant focus on oil and gas and look for sustainable, renewable, clean energies. The destruction of our wilderness areas for resources that won't last very long is unacceptable and ill-advised at best. The huge profits made by oil companies these past couple years should be invested in finding	See General Comment Response #5
Energy and Minerals	Betsy Shade	Where mineral leasing is to be done, BLM should limit drilling to one drill pad per square mile, and Best Management Practices should be required in all operations.	See General Comment Response #13
Energy and Minerals	Phyllis Sladek	In view of the impending decline in the world supply of oil ("peak oil"), it's unethical in the extreme to drill without an immediate and massive conservation effort. We need to direct the last of our oil to solar and wind, while we have the chance.	See General Comment Response #5
Energy and Minerals	Diana Soloway	Your plan must also restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health.	See General Comment Response #13
Energy and Minerals	John Spezia	Oil and gas is destroying the biological system, damaging private property, degrading air & water quality as well as wildlife and recreation. It should be restricted from all areas where the above mentioned impacts occur.	See General Comment Response #1
Energy and Minerals	Victoria Starr	On the very credible information I received in a conversation with a geophysicist who had been employed by Texas oil companies for nearly 20 years, I understand that oil and gas development does, in fact, seriously harm the habitat of the surrounding wildlife. It takes many years after actually finding a viable reserve, to bring the product to market. By the time we have irrevocably destroyed precious land that should be protected, we should have developed alternatives to our energy needs. This is a very short-sighted approach.	See General Comment Response #1
Energy and Minerals	Maureen Startin	Considering the lack of creativity and foresight (long-term) to the environment in the present plan, the best alternative strategies are necessary. The "ideal" would be to protect all of these lands from gas and/or oil exploration; however, this takes a courage of one who cares about the future, rather than one willing to bend to industry at the cost to all. Despite the recognition that climate change is rising, and the need for America to turn to alternative energy, agencies continue to maintain the "old path;" my encouragement would be for a totally	See General Comment Response #1

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		new path, which encompasses creative and long-term solutions, protecting wildlands from any disturbance, and with them the species who inhabit these areas. In the alternative, I would strongly encourage that these areas be given full protection before other species fall prey to industry and greed. I would ask that you consider the long term impacts, and not deny the symbiotic relationship that humans have with the earth and ALL species.	
Energy and Minerals	Wes Stay	The draft plan does not provide for the conservation of any hydro carbons for future generations energy needs	See General Comment Response #1
Energy and Minerals	Wes Stay	Does not protect surface owners of split estate land.	Neither FLPMA, NEPA, nor BLM's planning regulations and policies include a requirement to protect surface owners split estate land. Negotiations with surface owners of split estate land is outside the scope of this RMP and its NEPA document.
Energy and Minerals	Linda Steele	And I can assure you from personal experience that if you don't monitor closely - very closely - whatever oil and gas activities you allow into these pristine areas, they will be abused, exploited and destroyed as fast as those industries can get it done. So be careful what you ask for, or you may surely get it.	See General Comment Response #1
Energy and Minerals	Peter Steinhart	Please restrict any approved oil and gas activity to one well per 640 acres and mandate adherence to best management practices that will protect wildlife habitat, as well as air and water quality, and human health. Off-road vehicles should be restricted to designated routes,	See General Comment Response #13
Energy and Minerals	Caroline and David Tapia	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Noalani Terry	I am extremely concerned about plans that put Vermillion Basin in jeopardy. I understand the need to recover some resources from these areas but 93 percent of wilderness-quality landscape? Let the oil and gas drilling be done in areas that have already been damaged. Since thousands of acres in Colorado have already been leased but not drilled, why do you have to open up additional lands to devastation at this point in time?	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral

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			development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and Minerals	Noalani Terry	If drilling must take place, let's limit it to no more than 9 percent and please carefully consult with those who know the region well enough to decide which lands can be sacrificed with the least impact to the beauty and ecological services provided by the region.	See General Comment Response #1
Energy and Minerals	The City Council of Steamboat Springs	Oil and Gas Development: Areas Closed to Leasing: Currently, 78,000 acres are closed to leasing. Alternative C would increase the closed area to 160,870 acres and would include some protection of Vermillion Basin. This represents having 93 percent of the resource area open for gas development while closing only 7 percent. Under Alternative C, development of Vermillion Basin (77,000 acres), if allowed, would be coordinated through a unitization approach with no more than 1 percent of the total acres leased with a federal unit to be disturbed at any one time. We urge BLM to go a step further and protect approximately 12 percent of the mineral estate by protecting the seven Citizen's Wilderness Proposal (CWP) areas from gas development (Diamond Breaks, Cross Mountain, Cold Springs Mountain, Yampa River, Dinosaur Additions, Pinyon Ridge, and Vermillion Basin) and keep Vermillion Basin closed to oil and gas development. Six of the seven CWP areas, except Vermillion Basin, correspond to BLM Wilderness Study Areas (WSAs).	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Additionally, the Proposed RMP/Final EIS has been revised so Alternative C (Proposed RMP) closes Vermillion Basin to oil and gas leasing for the life of the RMP. The 1% stipulation was moved to Alternative B for continued consideration in the Final EIS.
Energy and Minerals	The Nature Conservancy in Colorado	Executive Summary- Minerals – oil and gas (p.ES-11): Table ES-3. Oil and gas reasonably foreseeable development. One row in this table states, “Acres disturbed in the short term.” Another states, “Acres disturbed in the long term.” Please define “short-term” and “long term.”	Short term and long term are defined on page 4-2 of the Draft RMP/EIS.
Energy and Minerals	The Nature Conservancy in Colorado	Appendix F - Criteria for subsequent activity planning: It is unclear why Appendix E appears to pertain to activity planning for oil and gas (which Appendix E should clearly state) and Appendix F appears to pertain to activity planning for other relevant resources uses. Consider adding Appendix E into Appendix F, or retitling the appendices to ease the reader’s understanding. For example, BLM could create a series of appendices to identify criteria for	BLM prefers the existing organization and format of the appendices.

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		subsequent activity planning [e.g., A-1 = Activity planning for O&G, A-2 = Activity planning for OHV Designations, etc.]	
Energy and Minerals	Kathy Toner	It would be much more beneficial to invest in alternative energy sources like wind and solar rather than to continue to deforest and pollute the air and soil by oil drilling. With the decrease air quality increasing, do you really want to be responsible for carrying out policies that contributing to the destruction of our environment? If half the money that is spent on oil drilling was invested in solar energy, the benefit would be recouped in cleaner air, less ground pollution and yes, decreased profits for oil companies who are continuously posting major profits at the expense of the American people, not to mention the rest of the planet.	See General Comment Response #5
Energy and Minerals	Tri-State Generation & Trans. Assoc.	Planning Issues: Issue 1: Energy and Minerals (Page ES-2) Table ES-3, Page ES-11, illustrates an oil and gas reasonably foreseeable development scenario for the 20-year planning period following the approval of the Record of Decision for this planning effort. If the scenario happens, this represents about 150 wells developed for each of those 20 years. Consider adding more discussion to this issue in the Proposed RMP/Final EIS because of the secondary effects of this demand for gas and oil, such as the need to identify additional rights of way (ROW) corridors for utilities and transportation.	The fourth bullet on page 4-145 of the Little Snake Draft RMP/EIS states that under Alternatives A, B, and C, a future gross surface disturbance of 49,216 acres and future long-term disturbance of 23,030 would result from drilling 3,031 wells over the next 20 years. These estimates include pipelines, gathering lines, and power lines that are approved as a lease or unit action. Pipelines that require right-of-way approval are realty actions and not oil and gas operations and as a result are not included in the disturbance estimates.
Energy and Minerals	Tony Troutman	Your plan must NOT restrict any approved oil and gas activity to one well per 640 acres. This is unrealistic and does not consider the fact that resource type drilling cannot drain more than 80 acres with even the best technology. Why waste oil and gas forcing oil companies to spread out production that is geologically concentrated. Resource type shale plays are only economically practical and efficient with higher density of drilling and wider spacing only means the area between the wells is not drained by the wells. Large well spacing concepts are a holdover from an obsolete paradigm that assumes there is connected reservoir porosity between the zones of production. With resource play type shale production there is NO porosity, as the oil and gas is still contained within the source rock where it was generated. Environmentalists that urge BLM to spread out well spacing are simply unaware of the technical requirements of oil well drilling in shale resource plays. As BLM is no doubt witnessing, some resource play type production is now going to 40 and 10 acre spacing, an example being Pinedale and Jonah Fields. I urge you to consider this nation's call for energy independence and	See General Comment Response #13

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		to understand that 640 acre spacing will only result in wasted wells that will eventually have to be re-drilled in order to have production.	
Energy and Minerals	Vince and Sandi Vanacore	ENOUGH IS ENOUGH! A balanced approach is needed to protect and preserve these special places. Population expansion is having a negative impact on our environment! Don't permit gas and oil destroy the last of these great places. We tourist like to visit natural areas, not more sprawl or oil or gas rigs, etc. We need to develop alternative sources of energy today!	See General Comment Response #1
Energy and Minerals	Vermillion Ranch Limited Partnership	Mineral withdraws must Id value of resource lost to make an informed decision! What is the value of the deferred minerals?	See General Comment Response #36
Energy and Minerals	Vermillion Ranch Limited Partnership	Pg 2-41-44 WSA same as above and must delineate the value of all minerals	See General Comment Response #36
Energy and Minerals	Lyndsey Watson	I think the administration's energy would be much better spent on developing ALREADY EXISTING, innovative fuel alternatives.	See General Comment Response #5
Energy and Minerals	Western Watersheds Project	Oil and gas exploration and development must be prohibited in WSAs, ACECs, and special habitat management areas. Where it is allowed it must be carefully monitored and controlled with restoration of all disturbed areas under an ecologically based restoration plan using only native species for revegetation. The noise and human activity associated with this development must be mitigated. The standards and monitoring must be spelled out in the Final RMP.	Under the Interim Management Plan, WSAs are closed to oil and gas leasing and development under all alternatives. Oil and gas leasing stipulations for ACECs and fish and wildlife habitats vary by alternative. The management actions under the Proposed RMP/Final EIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Energy and Minerals	Gaines Whitcomb	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	See General Comment Response #13
Energy and Minerals	Kunda Wicce	(1) restrict approved oil and gas activity to one well per 640 acres and require best management practices;	See General Comment Response #13
Energy and Minerals	Wilderness Society (The), et. al.	By limiting the options for closing areas to oil and gas development, BLM is improperly constraining the range of management alternatives in contravention of NEPA. Although many acres are open to oil and gas development subject to various lease stipulations, BLM often offers companies exceptions, modifications or waivers from the application of “no surface occupancy” (NSO) stipulations. Appendix E to the Draft RMP sets out a wide variety of “criteria” that could support a request for exceptions, modifications	The commenter does not identify the manner in which closing areas to oil and gas development was limited in the Draft RMP/EIS. The Draft RMP/EIS considered and analyzed a range of alternatives that made land use allocations across the use/preservation spectrum, while complying with BLM’s multiple use mandate. This resulted in analysis of alternatives that would place on leases no

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		or waivers, but does not include any specific measurement for when "timing" or "site location" could be sufficient or any limitations on the applicability of exceptions, modifications or waivers to certain types of stipulations or conditions. Recommendations: BLM's obligation to manage these public lands for a variety of resources, of which oil and gas is only one, requires consideration of alternatives to close substantial areas to oil and gas leasing and a preferred alternative that gives more weight to other uses of the public lands. The Wilderness Society's "A GIS Analysis of the Undiscovered Technically Recoverable Oil and Gas in the Little Snake Resource Area," found that the entire Little Snake Resource Area contains less than a year's worth of technically recoverable natural gas and a little over 3 hours' worth of oil compared base on current U.S. consumption; while the percentage of these resources that are economically recoverable will be considerably less. Also, the lands proposed for protection in the CWP make up only 6% of the Little Snake Resource area; these lands contain less than 5% of the technically recoverable gas in the Little Snake Resource Area and less than 1% of the oil. In particular, the Vermillion Basin CWP area contains only enough technically recoverable gas to supply U.S. energy needs for about 10 days, and less than 8 minutes' worth of oil. The high costs of sacrificing the important cultural resources and wilderness qualities of these areas, as well as the other natural resources in the Little Snake Resource Area, must be considered and weighted against this limited benefit.	surface occupancy stipulations or would close areas to leasing entirely on between 6% (Alternative B) and 38% of the RMPPA. Additionally, less severe stipulations were considered to provide varying degrees of protection to a variety of resources and were also analyzed. This included the closing all areas BLM found to have wilderness characteristics to future oil and gas leasing under Alternative D. Closure to oil and gas leasing provides no more protection to surface resource values than requiring no surface occupancy stipulations can provide, although NSO stipulations have the potential to be waived, as the commenter points out. BLM approves a modification or waiver of lease terms and stipulations in accordance with 43 CFR 3101.1-4. The regulation states that "a stipulation included in an oil and gas lease shall be subject to modification or waiver only if the authorized officer determines that the factors leading to its inclusion in the lease have changed sufficiently to make the protection provided by the stipulation no longer justified or if proposed operations would not cause unacceptable impacts. If the authorized officer has determined, prior to lease issuance, that a stipulation involves an issue of major concern to the public, modification or waiver of the stipulation shall be subject to public review for at least a 30-day period. In such cases, the stipulation shall indicate that public review is required before modification or waiver. If subsequent to lease issuance the authorized officer determines that a modification or waiver of a lease term or stipulation is substantial, the modification or waiver shall be subject to public review for at least a 30-day period." Beyond this, the Proposed RMP/Final EIS has been modified with additional detail to the criteria presented in Appendix E, clarifying under what conditions the criteria could be considered. Based on the regulations and the revised Appendix E, a waiver, modification, or exception would not be granted if the factor/resource for which the stipulation was developed was still at risk of unacceptable impacts. The regulation and the criteria identified in Appendix E explain the limitations on the applicability

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			of exceptions, modification or waivers. However, each request would be considered and analyzed on a case-by-case basis and documented individually, as explained in Appendix E. Finally, NEPA does not require a comparative analysis of monetary values associated with each alternative. While monetary value can be considered for some resources, such as oil and gas, the accuracy and availability of monetary valuations of non-market resources such as cultural and wilderness values is limited. As required by NEPA, the Draft RMP/EIS presented a range of alternatives and notes the impacts to cultural resources and wilderness characteristics from those alternatives, including for oil and gas development in Vermillion Basin, as well as impacts to other resources/uses/socioeconomics.
Energy and Minerals	Wilderness Society (The), et. al.	1. Best Management Practices It is vital that the RMP require the use of best management practices (BMPs) for oil and gas exploration and development, which can drastically reduce the impacts of oil and gas development on the other natural resources of the public lands. The Draft RMP identifies the existence of BMPs and references the BLM's "Best Management Practices for Oil and Gas Development on Public Lands" (also known as the "Gold Book"). Draft RMP, p. 2-64. However, instead of identifying specific BMPs or requiring their incorporation into leases or conditions of approval, the Draft RMP merely states that "use of a variety of BMPs would be encouraged" (emphasis added). Id. BLM's guidance requires consideration of BMPs for oil and gas development. BLM's Instruction Memorandum 2004-194 directs consideration of BMPs, and both the IM and the recently updated Gold Book provide examples of BMPs that can be applied to both new and existing leases, in order to limit the damage from oil and gas development. Making BMPs mandatory is consistent with FLPMA's requirement that the BLM avoid unnecessary or undue degradation of the public lands. Further, under NEPA, only if these BMPs are mandatory can the BLM rely upon them to mitigate the potential impacts of oil and gas development. It is critical that the RMP consider and make BMPs mandatory in order to comply with BLM's guidance and obligations to protect the many natural values of these lands. Recommendations: The Wildlife Protection Guidelines for Oil and	It is important to point out that IM-2004-194 requires consideration of best management practices (BMPs) at the APD stage, not the landscape level RMP stage. Additionally, the commenter's own language implies flexibility in application of BMPs, using language such as "where appropriate" and "improve application of BMPs as technologies advance." Requiring BMPs at the RMP stage would require only those BMPs that were specifically mentioned in the RMP, and only as specifically mentioned in the RMP unless there was an RMP amendment to update the BMPs. Because of this, the BLM planning handbook notes that BMPs "are not considered a land use plan decision unless the land use plan specifies that they are mandatory. They may be updated or modified without a plan amendment if they are not mandatory" (BLM-H-1601-1 pp Glossary 1). Consistent with this direction, the Draft RMP/EIS contains some mandatory BMPs, while others on included by reference to application of BMPs. For clarity sake, it is important to note that BMPs are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental

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		Gas Development developed by the Colorado Wildlife Federation and the Colorado Mule Deer Association, and endorsed by 66 additional sportsmen and other wildlife conservation groups in Colorado, provide important recommendations that should be considered and incorporated as appropriate (copy attached and incorporated by reference). The following BMPs are highlighted from these Guidelines: • Where appropriate, require directional drilling to permit oil and gas development while reducing surface impacts to important areas; • Maximize closed loop drilling when possible to protect water and soil from toxic chemicals; • Use clustered development based upon best available technology to minimize surface area development and impacts, and to reduce noise and dust caused by traffic to and from drill sites; • Require unitization and communitization so that BLM can ensure protective measures are incorporated in unitization and communitization agreements and cooperative development can reduce impacts to natural resources; • Require use of existing roads to the maximum degree possible and require minimization of the length and environmental impact of new roads constructed to service well locations; • Formally consult with Colorado Division of Wildlife (CDOW) before setting the number of active drill pads within a Geographical Area Plan (GAP) boundary to identify important fish and wildlife habitats; • Where large blocks of public land will be leased, sell the new leases in blocks that coincide with the objectives of maximum practicable surface spacing and minimization of surface disturbance and habitat fragmentation; • Shorten the duration of ongoing disturbance by prohibiting intermittent drilling; • Mandate operators to significantly improve their application of BMPs as technologies advance; • Require interim reclamation and immediate post-drilling restoration of land, including rigorous control of noxious weeds, such that any land not in use or needed for ongoing operations will be reclaimed; • Require operators to apply best available control technology to reduce noise, water and air pollutants, including flareless well completions; and • Increase bonding to a level and form that is sufficient to cover all	impacts from management actions. BMPs can include structural and nonstructural controls, specific operations, and maintenance procedures. BMPs can be applied before, during, and after activities to reduce or eliminate negative environmental impacts. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific National Environmental Policy Act process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. While BMPs can be RMP decisions, they often contain a level of specificity that is best made or analyzed on a site-specific basis. BMPs may also be identified during an interdisciplinary process when evaluating site-specific management actions. Implementation and effectiveness of BMPs need to be monitored to determine whether they are achieving RMP goals and objectives. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. BLM seeks to develop and apply BMPs to mitigate impacts from mineral development, as well as other uses. In addition to the BMPs identified in the Draft RMP/EIS, BLM would consider implementation of other BMPs to address specific issues identified at the implementation level.

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		reclamation. The RMP should also consider no development in aquifer recharge zones and commit to enforcing both these BMPs and stipulations such as seasonal closures and buffer zones around sensitive habitat with limited or no opportunities for exception, modification or waiver.	
Energy and Minerals	Wilderness Society (The), et. al.	The RMP does not include sufficient requirements for directional drilling and the greater well-spacing requirement that could result from its use. As discussed in detail in the comments of Ken Kreckel, the geology of the Little Snake Planning Area and the economics of natural gas development show that directional drilling is feasible. However, BLM has improperly concluded that directional drilling is neither feasible nor necessary. As detailed in Ken Kreckel's comments, the Draft RMP and reasonable foreseeable development scenario (RFD), which project 3,031 wells, underestimate the likely level of development by 200%. A particularly glaring example is the assumption in the RFD of 225 wells drilled in an area including Hiawatha, Sugar Loaf and Vermillion, when the pending EIS for the Hiawatha project proposes 1,403 wells in the Colorado portion of the project alone. Based on this information and the history of the manner in which tight gas reservoirs have been developed, Ken Kreckel concludes that the BLM has radically underestimated the amount of drilling likely to occur – along with the related surface disturbance and other environmental impacts. NEPA requires that BLM thoroughly analyze the direct, indirect and cumulative impacts of oil and gas development and consider appropriate mitigation measures. BLM is also obligated to base its management approach on quality scientific information. Underestimating the likely amount of oil and gas development has contributed to the BLM ignoring the need to use directional drilling and to ensure adequate spacing. As shown in Ken Kreckel's comments, BLM's conclusions about the utility and feasibility of directional drilling are not based on accurate scientific data. Based on the accurate data and analysis presented by Mr. Kreckel, the majority of the Field Office can be developed using well spacing of no less than 320 acres to 640 acres. Maximizing the space between wells and the use of directional drilling is also consistent with BLM's obligations under FLPMA to avoid unnecessary and undue degradation and permanent impairment of the public lands. Recommendations: BLM must acknowledge the likely density of drilling that will occur and make use of directional drilling to limit surface disturbance. BLM must also acknowledge the feasibility of directional drilling to limit surface disturbance and should mandate	The Draft RMP/EIS does not conclude "that directional drilling is neither feasible nor necessary." On the contrary, chapter 2 of the Draft RMP/EIS contains several references to the use of directional drilling as a mitigation technique to reduce impacts from oil and gas development (e.g., Draft RMP/EIS pages 2-18, 2-25, 2-49, 2-134). Additionally, the Reasonable Foreseeable Development: Oil and Gas in the Little Snake Field Office Administrative Boundary Area (RFD) specifically notes horizontal, directional, and new technology drilling practices that are currently implemented in the LSFO. The Draft RMP/EIS does consider directional drilling where possible and is one of many mitigation measures used in the planning area. Concerning the RFD of 225 wells in the Hiawatha, Sugar Loaf and Vermillion areas, it is important to clarify that Table 8 from the RFD (which contains the 225 wells number) is not BLM's conclusion of anticipated oil and gas activity, but displays future development scenarios from three industry representatives that were submitted to BLM. This is obvious as the total well count from that table is (1,686) is only 44% (1,345 fewer wells) of the total RFD for oil and gas used for the RMP process. While this information was used in developing the RFD, as well as other information provided by industry representatives of those operators who plan on development within the RMPPA, it is not the sole source leading to the final RFD. The RFD was developed using a variety of information sources, including industry operators who are familiar with the geology of the region as well as the economic and other factors that must be considered in developing an RFD. If the threshold allowed in the RFD is approached in the future due to market demand, BLM will revise the RFD and associated NEPA

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		directional drilling to achieve spacing of no less than 320 acres to 640 acres throughout the Field Office. In more sensitive areas, BLM can use spacing of no less than 640 acres between wells and/or limit oil and gas development with no surface occupancy stipulations.	analyses. The Draft RMP/EIS does contain language encouraging the use of directional drilling, where feasible. More specifically the Proposed RMP/Final EIS includes stipulations for future leases in areas of high- and medium-value sagebrush habitat to limit surface disturbance to less than 1 and 5%, respectively. Directional drilling is specifically identified as an option for operator's to develop the oil and gas resources while complying with this stipulation. While restricting oil and gas activities to one well per 640 acres could be considered, determining well spacing is better made at the implementation level where site-specific conditions and issues can be directly addressed. Rather than a blanket well-spacing stipulation, BLM has preferred to use a percent of disturbance threshold, with an overriding goal of "maintaining large, unfragmented blocks of sagebrush habitat" (Proposed RMP/Final EIS Section 2.5.5.2). In addition, best management practices (BMP) are applied on a site specific basis to reduce, prevent, or avoid adverse environmental or social impacts. BMPs need to be adapted to meet the site-specific requirements of a particular project as well as the local environment. They are incorporated into site-specific project proposals and supported by site-specific environmental analysis. While use of surface disturbance thresholds could result in well spacing limitations, they also allow for flexibility to better provide protection to resources while allowing for development of the nation's domestic energy supply.
Energy and Minerals	Wilderness Society (The), et. al.	Phased development is an overarching plan that spreads out the harms created by oil and gas exploration and development over time and/or over a geographic area so that other uses and values of the land can be sustained both during and after the lifetime of oil and gas extraction. Phased development can limit both the amount of equipment in use at any given time and amount of surface disturbance on a lease at any given time, and can require successful restoration before permitting additional disturbance. It can also allow for wildlife corridors to be left undeveloped to allow for wildlife	BLM's consideration in the Draft RMP/EIS of ceilings on surface disturbance for oil and gas development is a form of phased development. Using disturbance ceilings of 1% and 5% is a flexible way to require operators to phase their developments. The limitations on surface disturbance impacts and slowing development down until old surface disturbance is reclaimed is maintained, mitigating wildlife and air quality impacts and increasing large,

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		movement. BLM improperly concludes that phased development is not a workable approach to managing the impacts of oil and gas development. A phased development alternative that provides for oil and gas extraction while preserving other uses of the lands for future generations is most consistent with FLPMA. Under FLPMA, the BLM is required to “manage the public lands under principles of multiple use and sustained yield." 43 U.S.C. § 1732(a). The long-term nature of phased development supports FLPMA’s requirement for "sustained yield" by allowing "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources consistent with multiple use." 43 U.S.C. § 1702(b). FLPMA’s provision that the Secretary of Interior shall take any action “necessary to prevent unnecessary or undue degradation of the lands” is consistent with the use of phased development. 43 U.S.C. § 1732(b). Further, the preservation of the economic and ecosystem resources of the land through the lifetime of oil and gas extraction in the region best fulfills FLPMA’s multiple use and sustained yield mandates. Planning so that development proceeds at a pace and in a manner that protects present uses and resources is the best way to ensure that it proceeds without permanent impairment of the productivity of the land that would defeat "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources consistent with multiple use." 43 U.S.C. § 1702(b).	unfragmented blocks of habitat. However, unlike a “traditional” phased development approach where BLM requires development in area X first, then move to area Y, there would be no geographic limits (other than restrictions, such as sage-grouse leks) and no limits on number of wells drilled per year. Operators have ability to account for economics and plan for pipelines and other infrastructure. Because the range of alternatives would allow for phased leasing and development in Vermillion Basin, the Draft RMP/EIS incorrectly identifies phased development in Vermillion Basin as an alternative not analyzed in detail. This section has been removed from the Proposed RMP/Final EIS.
Energy and Minerals	Wilderness Society (The), et. al.	In a recent decision, a federal court in Montana held that phased development falls within the “range” of alternatives to be considered. The court found that BLM’s approval of an RMP Amendment and FEIS that allowed full-field coal bed methane development without consideration of a phased development alternative violated NEPA. Northern Plains Resource Council v. Bureau of Land Management, CV 03-69-BLG-RWA (D.Montana February 25, 2005 - attached). The court reiterated that “the agency must look at every reasonable alternative within the range dictated by the nature and scope of the proposal. The existence of reasonable but unexamined alternatives renders an EIS inadequate.” Northern Plains Resource Council, pp. 10-11, citing Friends of Southeast’s Future v. Morrison, 153 F.3d 1065 (9th Cir. 1998). The court then stated that phased development is “within the range of reasonable alternatives” and must therefore be “given detailed consideration” when the BLM is considering a plan for development rather than a site specific	BLM's consideration in the Draft RMP/EIS of ceilings on surface disturbance for oil and gas development is a form of phased development. Using disturbance ceilings of 1% and 5% is a flexible way to require operators to phase their developments. The limitations on surface disturbance impacts and slowing development down until old surface disturbance is reclaimed is maintained, mitigating wildlife and air quality impacts and increasing large, unfragmented blocks of habitat. However, unlike a “traditional” phased development approach where BLM requires development in area X first, then move to area Y, there would be no geographic limits (other than restrictions, such as sage-grouse leks) and no limits on number of wells drilled per year. Operators have ability to account for economics and plan for

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		project. Lastly, the court held that phased development "is not the functional equivalent of a no-action alternative" and should be considered in addition to other reasonable alternatives. Because this EIS is considering substantial increases in the development of oil and gas resources in the Little Snake planning area, the RMP is, as in the Montana case, "precisely the place for BLM to consider alternatives varying the pace and geographic sites of development." Northern Plains Resource Council, p. 19. Recommendations: The BLM must uphold its responsibility to protect the abundant natural values present in the Little Snake Field Office by considering a phased development alternative and evaluating its environmental consequences, as required by both FLPMA and NEPA.	pipelines and other infrastructure. Because the range of alternatives would allow for phased leasing and development in Vermillion Basin, the Draft RMP/EIS incorrectly identifies phased development in Vermillion Basin as an alternative not analyzed in detail. This section has been removed from the Proposed RMP/Final EIS.
Energy and Minerals	Wilderness Society (The), et. al.	Surface disturbance limitation for Vermillion Basin will not reliably protect the wilderness values, cultural resources and other natural resources of the area. As discussed above, the preferred alternative's approach to limiting surface disturbance in Vermillion Basin to 1% at any given time, subject to ongoing reclamation, is not likely to protect the many special and vulnerable resources in this area. Because the standard for reclamation can be functionally reduced to soil stabilization, it cannot be reasonably relied upon to restore the naturalness and scenic values of Vermillion Basin. Also, the management approach will actually permit more intensive surface disturbance in smaller areas undergoing development, by encouraging operators to form units that include parcels with low oil and gas potentials for use as "mitigation areas." Since there are no requirements for operators to limit surface disturbance to any specific road density or any other limits, there are no actual controls on the amount of damage that can occur at one time. As discussed in the comments of the Colorado Plateau Archaeological Alliance, "development could be aggregated" and "such development could result in concentrated cumulative effects" that will damage the cultural resources of Vermillion Basin. This same conclusion applies to the other natural resources of Vermillion Basin, such as its wilderness values. The Draft RMP also acknowledges that "oil and gas development would result in a significant impact to wilderness characteristics." Draft RMP, p. 4-126. The intensity of development will necessarily affect the likelihood of success in restoring an area. The Draft RMP's failure to provide: limitations on the intensity of surface disturbance, meaningful restoration requirements, a detailed measurement, monitoring and enforcement approach, or sufficient	Under at least one alternative in the Draft RMP/EIS, all lands within Vermillion Basin that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the opportunities for solitude and primitive recreation. Therefore, the Draft RMP/EIS did consider a range of alternative management methods in Vermillion Basin. The commenter simply doesn't agree with the management associated with the Draft RMP/EIS's Preferred Alternative. Additionally, the Draft RMP/EIS used the most up-to-date monitoring and inventory data when preparing the Draft RMP/EIS. The commenter's claim that there could be impacts to wilderness values and cultural resources is supported by the Draft RMP/EIS. The Draft RMP/EIS impact analysis acknowledges that even with the 1% surface disturbance limitation, oil and gas development would be a significant impact to wilderness characteristics in Vermillion Basin, as well as impacts to cultural resources through inadvertent damage and the increase in potential vandalism and pot hunting. The impact analysis in Section 4.3.11.2 has been updated to further disclose impacts from visual intrusion and noise, as well as reclamation issues. Draft RMP/EIS Appendix O details the surface reclamation performance standard that must be met before acreage would be released from counting

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		scientific data, results in a management approach that cannot be relied upon to protect Vermillion Basin. The preferred alternative therefore violates NEPA's requirements to use quality data and enforceable, effective mitigation measures, as well as to avoid FLPMA's mandate to avoid unnecessary or undue degradation of the public lands. Further, the Draft RMP's failure to recognize the extent of the likely environmental impacts of the preferred alternative violates NEPA's requirement to assess the direct, indirect and cumulative impacts of a proposed action. Recommendations: The 1% surface disturbance limitation is not an acceptable approach for Vermillion Basin. It cannot be relied upon to mitigate the significant impacts to its wilderness values and cultural resources, which should be protected in accordance with FLPMA's multiple use mandate.	against the 1%. Based on public comments, more detail has been added to Appendix O. It was never the intent that "the standard for reclamation can be functionally reduced to soil stabilization." This has been clarified in the Proposed RMP/Final EIS. The commenter is incorrect concerning the claim that "there are no requirements for operators to limit surface disturbance to any specific road density or any other limits." As noted in the Draft RMP/EIS, prior to any development being approved there must be an approved Plan of Development in place that, among other requirements for mitigation, includes a strategy for limiting surface disturbance. This approach will allow oil and gas development in Vermillion Basin to be planned as an entire unit, including mitigations to ensure that the surface disturbance on 1% of the area is performed in a manner that allows for coordinated and organized oil and gas development while protecting natural and scenic values. As required by NEPA, the Draft RMP/EIS presented a range of alternatives and notes the impacts to cultural resources and wilderness characteristics from those alternatives, including for oil and gas development in Vermillion Basin, as well as impacts to other resources/uses/socioeconomics. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B was also revised to include the 1% limit on surface disturbance. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Energy and Minerals	Wilderness Society (The), et. al.	The Draft RMP does not include a detailed discussion of the manner in which the BLM will monitor, measure and enforce the 5% limitation – all of which will present substantial challenges. While the Draft RMP mentions that GIS analysis will be used to define the existing level of disturbance as a baseline and for monitoring, there is no discussion as to who will perform this monitoring and how the BLM will use it to enforce the limitation. Further, since this is a voluntary approach, BLM cannot quantify how much of the area	Concerning who will perform and pay for the reclamation and monitoring, the language presently in the Proposed RMP/Final EIS is sufficiently clear. The first sentence of Appendix O notes that it is the lessee's responsibility to use "reclamation practices." The activities that constitute those reclamation practices are defined throughout the Appendix, but if the responsibility to perform those activities is not

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		would be managed under the 5% surface disturbance and how much would be managed under the timing stipulations and has not assessed how these two different management approaches can work together to provide sufficient functional habitat. The Draft RMP also provides that the 5% surface disturbance limitation and year round drilling may apply to individual leases or units, but does not specify any minimum amount of acreage that must be included to make the approach functional. Draft RMP, p. 2-17.	specifically identified, it would default to this first sentence, that is, the lessee. The way the text is written clearly supports this. Further, the section discussing "Maintaining the Project Record: Baseline Measurements, Monitoring, and Updating PODs" in chapter 2 of the Proposed RMP/Final EIS has been expanded. The revised paragraphs point out that the leaseholder/operator will document the baseline measurement of existing disturbance. This will be performing using GIS analysis and will be ground-truthed by BLM to ensure accuracy. Then on a minimum of an annual basis, the operator and BLM will meet to review the POD. Prior to the meeting, the operator would update the POD with the cumulative total of surface disturbance in the project area. The Proposed RMP/Final EIS would mandate surface disturbance limitations for new leases. The surface disturbance limitations would remain voluntary for existing leases. Impacts from both adherence to seasonal stipulations and the ceilings on surface disturbance were included in the Draft RMP/EIS. Concerning the size of the lease or project area necessary to make the approach functional, an operator would propose a project area for BLM approval. If the area were too small and would not meet the goal of creating large patches of unfragmented habitat, BLM would not approve the project area. Additionally, operators would likely not propose small project areas, as small areas would allow very little disturbance, making them functionally impossible to develop. Thus, an incentive is built into the approach to create large project areas.
Energy and Minerals	Wilderness Society (The), et. al.	The measurement of the 5% disturbance will underestimate impacts, because the calculation will not include surface disturbance (even roads) if it does not relate to oil and gas development. Draft RMP, p. 2-17. The impacts of surface disturbance are not distinguished by source – just by effect on the landscape and the agency should not ignore the impacts of this additional disturbance. Further, the Draft RMP provides that if an area is already experiencing surface disturbance from oil and gas development at or exceeding 5% or likely to exceed 5% if development continues (i.e., existing	While impacts to resources do not necessarily vary based on what makes a given surface disturbance, requiring an oil and gas leaseholder to be responsible for disturbance from another user is not equitable, nor is punishing a leaseholder for disturbance from another user. If BLM were to punish a lease holder for disturbance not related to their development, they would not opt into this approach and less sagebrush habitat would be projected. As

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		disturbance is already at 4%), then BLM will still permit additional disturbance if an operator can show that it "will reclaim" areas equal to the proposed disturbance. Draft RMP, p. 2-18. There is no discussion of what standards will be applied or how long or under what conditions an operator will be permitted to exceed the 5% limitation. The Draft RMP further permits operators to use off-site mitigation or compensatory mitigation to offset disturbance on an area being disturbed. Draft RMP, p. 2-18. Once again, the Draft RMP does not include any detailed discussion as to how off-site mitigation will be measured, payments for compensatory mitigation will be calculated, or how permitting payment or mitigation of areas that may be less suitable habitat will protect functional habitat for sage grouse and big game.	such, the stipulation on oil and gas leases can only be applied to disturbance resulting from activity by the leaseholder. The Draft RMP/EIS does not ignore impacts from these other sources, but identifies impacts from oil and gas development, as well as other sources of surface disturbance. Additionally, Alternative C (Proposed RMP) was updated to include a discussion of how non-oil and gas related projects would be treated in sagebrush habitat. For areas where existing oil and gas infrastructure already exceeds the 5% disturbance threshold, the intent of the proposed action is to not allow any additional disturbance above what is already present on the ground. Before an operator is allowed more acres to disturb in such a situation, they would have to meet the reclamation standard in Appendix O, not merely promise that they "will reclaim." This was clarified in the Proposed RMP/Final EIS. As it is unknown how many existing leaseholders in this circumstance would opt into the new stipulation, providing detail on every potential situation is impossible. Further detail of the specific reclamation strategies associated with each existing lease would be determined on a case-by-case basis.
Energy and Minerals	Wilderness Society (The), et. al.	All stipulations are subject to waiver, exception and/or modification under essentially unlimited circumstances: The Draft RMP refers to Appendix E as setting out standards for when certain stipulations may be subject to waiver, exception or modification. However, Appendix E does not set out any specific standards or situations that could support a decision not to apply a protective stipulation. Rather, the Appendix presents a list of "criteria," such as "weather severity," "timing" and "cumulative effects," then states that even this list is "a starting point and could change." Further, Appendix E does not include a discussion of which criteria could apply to justify waiver, exception or modification, does not identify which criteria might apply to certain stipulations, or otherwise distinguish among the many stipulations that could be affected. Accordingly, by permitting essentially unlimited opportunities to request waiver, exception and modification in the Draft RMP, the BLM cannot rely upon the protective lease stipulations as mitigation measures per NEPA's standards.	BLM approves a modification or waiver of lease terms and stipulations in accordance with 43 CFR 3101.1-4. The regulation states that "a stipulation included in an oil and gas lease shall be subject to modification or waiver only if the authorized officer determines that the factors leading to its inclusion in the lease have changed sufficiently to make the protection provided by the stipulation no longer justified or if proposed operations would not cause unacceptable impacts. If the authorized officer has determined, prior to lease issuance, that a stipulation involves an issue of major concern to the public, modification or waiver of the stipulation shall be subject to public review for at least a 30-day period. In such cases, the stipulation shall indicate that public review is required before modification or waiver. If subsequent to lease issuance the authorized officer determines that a modification or

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		Recommendations: In order to ensure that lease stipulations are a reliable and effective method for protecting the many resources of the public lands, such as wildlife habitat, watersheds, and recreation opportunities, the Draft RMP must stringently limit and specifically define the situations where waiver, exception or modification to lease stipulations can be considered. Operators are fully advised of lease stipulations before they bid on a lease and, by bidding on the lease, have determined the terms to be acceptable, in terms of both technical and financial feasibility. Therefore, BLM should not grant relief from the terms of a lease unless an operator can make a substantial showing as to why it is necessary.	waiver of a lease term or stipulation is substantial, the modification or waiver shall be subject to public review for at least a 30-day period." Beyond this, the Proposed RMP/Final EIS has been modified with additional detail to the criteria presented in Appendix E, clarifying under what conditions the criteria could be considered. Based on the regulations and the revised Appendix E, a waiver, modification, or exception would not be granted if the factor/resource for which the stipulation was developed was still at risk of unacceptable impacts. The regulation and the criteria identified in Appendix E explain the limitations on the applicability of exceptions, modification or waivers. However, each request would be considered and analyzed on a case-by-case basis and documented individually, as explained in Appendix E. In the end, as noted in Appendix E, a request for waivers, modifications, or exemptions undergoes an RMP and NEPA compliance review to ensure the action is consistent with the RMP's goals and objectives. Site-specific conditions drive the request for and approval of waivers, modifications, or exceptions, and they cannot all be analyzed or presented in the EIS.
Energy and Minerals	Wilderness Society (The), et. al.	The Preferred Alternative provides a management option "To maintain and improve large blocks of functional sagebrush communities, oil and gas operators could opt into an agreement to limit habitat fragmentation in return for easing timing limitation stipulations and allowing year-round drilling." Draft RMP, p. 2-16. We encourage the BLM's attempts to protect large functional patches of sagebrush habitat. However, this plan as described for the Preferred Alternative (Draft RMP, pp. 2-16 to 2-18 and 4-58) will not have the intended effect. The plan is optional for all oil and gas leases. It is unknown if any lease holder would choose to participate in this 5% disturbance cap in exchange for waving seasonal stipulations.	The section discussing "Improving and Maintaining Sagebrush Habitat Functionality by Limiting Fragmentation" in chapter 2 of the Proposed RMP/Final EIS has been revised. For existing leases, oil and gas operators could opt into an agreement to limit surface disturbance to 5% in areas of medium priority sagebrush habitat and 1% in areas of high priority sagebrush. However, all new leases offered in medium and high priority sagebrush habitats would include a mandatory 5 and 1%, respectively disturbance limitation and require completion of a Plan of Development illustrating a strategy to leave large blocks of undisturbed habitat.
Energy and Minerals	Wilderness Society (The), et. al.	The BLM is currently reassessing its approach to leasing for development of oil shale resources. See, e.g., BLM's "Oil Shale Resources" program page. At this point, the BLM has issued leases for research, development and demonstration (RD&D) projects in Colorado and Utah, which are intended to "test whether current	As there are oil shale resources within the RMPPA, the Draft RMP/EIS included decisions to manage those resources. The Proposed RMP/Final EIS was revised to add language to clarify management of oil shale leasing. Specifically, this language notes that

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		scientific knowledge and expertise will allow oil shale to be developed effectively, economically, and with responsibility to the environment and to local communities." While the agency has completed an initial scoping process for a programmatic EIS to "assess alternative actions for commercial leasing of oil shale resources", this document cannot analyze or, really, even describe expected impacts from leasing because the technology that will be used to develop oil shale has not yet been determined. Nonetheless, the Draft RMP proposes to "make available the federal coal and oil shale estate for exploration and development" and designates lands as available for oil shale leasing "consistent with lands available for oil and gas leasing or coal leasing." Draft RMP, pp. 2-172, 2-174. As a result, 93% of mineral resources in the planning area, based on either those available for oil and gas leasing (Draft RMP, p. 2-57) or federal coal lands available (based on 621,980 of 671,170 acres – Draft RMP, pp. 2-73), will be available for oil shale development. This decision cannot be supported based on available information. The technology or technologies that would be used to develop oil shale resources has not been determined – as acknowledged by BLM, the RD&D leases are being used to assess "whether current scientific knowledge and expertise will allow" development of oil shale; so the question is still "if" oil shale can be developed, not even "how" and certainly not "when." Therefore, the agency cannot reasonably assess the direct, indirect and cumulative impacts of leasing and cannot meet the requirements of NEPA. As found by the U.S. Court of Appeals for the Tenth Circuit, a failure to thoroughly analyze "unique environmental concerns" like those related to oil shale leasing and development will invalidate decisions to make lands available for leasing and leases issued. Pennaco Energy, Inc. v. U.S. Dept. of the Interior, 377 F.3d 1147, 1159 (10th Cir. 2006). Recommendations: Since the methodology of oil shale leasing and development cannot be reasonably predicted, BLM cannot take the requisite "hard look" at potential impacts and, consequently, should not make a broad commitment to open the vast majority of the Little Snake planning area to commercial leasing in this RMP. Rather, the RMP should delay designating lands available for oil shale leasing and commit to amending the RMP once sufficient information is developed. Among the items the BLM intends to analyze in the PEIS is the amendment of existing RMPs to address oil shale leasing in, among other areas, the Little Snake Resource Area. While we do	BLM will consider leasing oil shale, but that "future oil shale leasing would require additional NEPA analysis, as well as a Plan Amendment. This additional NEPA analysis could preclude development."

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		not concede that the BLM will have information sufficient to take the "hard look" at a commercial leasing program required by law in the PEIS, this ongoing effort provides yet another reason that it makes little sense for the agency to make lands available for commercial oil shale leasing in the Little Snake RMP.	
Energy and Minerals	Wilderness Society (The), et. al.	B. Resource estimates. The socioeconomic impacts as well as all the other impacts of the management alternatives are based on some dubious numbers for the amount of land and resources impacted. Section 4.4.1 "Impacts on Energy and Minerals," includes analyses based on the 2003 Energy Policy and Conservation Act (EPCA) report. These analyses break down the land, oil and gas resources in the Little Snake Resource Area into the various EPCA access categories for each alternative. These analyses appear to be biased in a way that deliberately exaggerates the impacts of even the very modest protections proposed in the Preferred Alternative (C) and especially those proposed in Alternative D (which implements the greatest protection for the area's multiple uses, including wildlife, backcountry recreation and cultural resources). A simple comparison of the numbers in Tables 4-42, 4-44, 4-46 and 4-48 shows that the estimates of total gas, liquids and acres for Alternative D are much greater than any of the other alternatives. The tables imply that there is 15% more land, 39% more gas and 30% more total liquid in Alternative D than in Alternative A (see Tables 1-3). Logic would dictate that this is physically impossible. It is also interesting to note that Alternative B, which places the least restrictions on the oil and gas industry is also indicated in the Draft RMP to affect the smallest land area and the fewest resources. In fact, the total amount of land, oil and gas presented in the Draft RMP increase with increasing restrictions on oil and gas (see Figure 1). It is clear that this will bias estimates of the opportunity costs of these restrictions upward. This overstatement of the amount of oil and gas off-limits in Alternative D has implications for the impact analyses throughout the entire Draft RMP and must be corrected. 1. Correct the discrepancy in resource estimates. Oil and gas resource and acreage totals should be the same for each alternative. 2. Recalculate all the potential impacts associated with the alternatives, especially Alternative D, to reflect accurate resource	The apparent bias is not a bias at all, but the result of seasonal stipulations that overlap areas with CSU and NSO stipulations. This is plainly apparent by reviewing maps 4-1, 4-2, 4-3 and 4-4. From reviewing the maps, it is obvious that Alternative B has the fewest areas of overlapping restrictions. On one hand this is beneficial to encourage oil and gas development. On the other hand, with less overlapping restrictions there are less duplicated acreages, which results in lower acres and lower amounts of product (oil and gas) showing in the table. Contrary to this, Alternatives C and D each have extensive stipulations, both for CSU and NSO as well as overlapping seasonal constraints. As a result, those areas are counted and product (oil and gas) estimated for both the CSU/NSO areas as well as the areas of overlapping seasonal constraints. The result is what appears to be an increasing amount of acreage and product, but is actually a simply reporting of the number of acres and amount of product (oil and gas) associated with each type of stipulation.

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		and acreage figures.	
Energy and Minerals	Wilderness Society (The), et. al.	The Energy and Minerals section also asserts that all the alternatives (even Alternative B, which favors oil and gas development to the extreme) "…could contribute to energy shortages and therefore a potential increase in energy prices… " (Draft RMP, p. 4-149). See Draft RMP, pp. 4-146, 4-150, and 4-153 for similar statements about Alternatives A, C and D respectively. These assertions are unfounded and amount to fear-mongering. In each of the alternatives only a minute amount of natural gas or oil would be precluded from development, amounting to a small fraction of the total resources in the RMPPA, and an infinitesimal fraction of the national total (see Tables 4 and 5). It would be impossible for these amounts to have any impact on national or even local energy prices. 3. Remove all inflammatory and unsubstantiated references to potential energy shortages and price increases.	In a supply and demand marketplace, the statement is technically true, although the degree to which such restrictions could contribute to shortages or price increases would be very minor. The Proposed RMP/Final EIS was revised to explain this by adding the following statement: "However, there are many global factors that influence supply and the price of oil and gas, well beyond those decisions being made in this field office."
Energy and Minerals	Wilderness Society (The), et. al.	C. Timing of oil and gas development Section 2.2.4 (Draft RMP, p. 2 – 4-5) presents BLM's justification for its rejection of the application of phased or strategic leasing and development for the oil and gas resources in Vermillion Basin. We request that the BLM reconsider its outright rejection of phased leasing and development. We feel that the justification for this decision is not valid and have provided a detailed response to each of BLM's points.	BLM's consideration in the Draft RMP/EIS of ceilings on surface disturbance for oil and gas development is a form of phased development. Using disturbance ceilings of 1% and 5% is a flexible way to require operators to phase their developments. The limitations on surface disturbance impacts and slowing development down until old surface disturbance is reclaimed and maintained, mitigating wildlife and air quality impacts and increasing large, unfragmented blocks of habitat. However, unlike a "traditional" phased development approach where BLM requires development in area X first, then move to area Y, there would be no geographic limits (other than restrictions, such as sage-grouse leks) and no limits on number of wells drilled per year, other than within the ceiling. Operators have ability to account for economics and plan for pipelines and other infrastructure. Because the range of alternatives would allow for phased leasing and development in Vermillion Basin (in Alternative C in the Draft RMP/EIS and in Alternative B in the Proposed RMP/Final EIS), the Draft RMP/EIS incorrectly identifies phased development in Vermillion Basin as an alternative not analyzed in detail. This section has been removed from the Proposed RMP/Final EIS.

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Energy and Minerals	Lynda Winslow	Opening 93% of the Little Snake Resource Area to oil and gas development, as called for in your proposal, is not a balanced approach. The final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, water and wildlife habitat.	See General Comment Response #1
Energy and Minerals	Sarah Woodmansee	There are many ways to develop an oil or gas field. Dispersed and slowly developed wells, using established clean management practices, careful and thoughtful road development, restriction of off road use, and complete protection of critical wildlife habitat and scenic habitat can be employed without impacting the oil and gas development pay-out to a large extent.	See General Comment Response #2
Energy and Minerals	Nancy S. Working	The BLM should instead follow the direction set by our state leaders, emphasizing renewable energy and balancing sensible leasing and drilling with protection for the many other resources on our public lands. Energy development should only occur outside proposed wilderness areas and important wildlife habitat. Where development is appropriate, a phased approach should be taken to minimize impacts and to guarantee the continued vitality and well-being of the region.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. Wind and solar energy are the primary potential sources for renewable energy generation. The development potential for biomass, hydropower, and geothermal renewable energy sources is minimal in the decision area. The Little Snake Draft RMP/EIS includes management actions that provide access for the development of renewable energy sources; however interest in developing renewable energy resources in the RMPPA has not occurred to date.
Energy and Minerals	Robert Working	Regarding oil and gas development. I think the current administration emphasis on fast tracking oil and gas leases is shortsighted and will lead to very little additional energy production in the LSRA compared to our total energy consumption but will result in severe and irreversible impact on the environment. The energy policy of the country must move toward conservation and renewable energy development. We cannot afford to continue to pump carbon in to atmosphere at the rate we are burning fossil fuels. For the time being we should proceed slowly on oil and gas	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral

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		leases and focus on managing these developments to limit surface impacts, air quality degradation, ground water contamination, and effects on big game habitat.	development. Wind and solar energy are the primary potential sources for renewable energy generation. The development potential for biomass, hydropower, and geothermal renewable energy sources is minimal in the decision area. The Little Snake Draft RMP/EIS includes management actions that provide access for the development of renewable energy sources; however interest in developing renewable energy resources in the RMPPA has not occurred to date.
Energy and Minerals	Yates Petroleum Corporation (through agent)	Page 2-117 Yates finds this 5% disturbance issue unacceptable. It may be for accommodating year-round drilling but it rarely works. It only works where the section is owned by one company. While the reference to 160-acres is only for an example, the 5% rule dictates 160-acre spacing. A conventional well will take up to 7 acres. 80-acre spacing or smaller for conventional wells is out under this rule. Page 2-158 Vermillion Basin When did BLM secure the right to require a unit for drilling? Unitization is a voluntary action and cannot be forced by the BLM. The 1% disturbance limit is phased development and unacceptable.	The 5% rule does not dictate 160-acre spacing. It is feasible to concentrate or clump wells and facilities and then drill directionally to develop the resource. The Draft RMP/EIS considered a range of alternatives that includes controlled surface use, ceilings on surface disturbance, and closure for Vermillion Basin.
Energy and Minerals	Yates Petroleum Corporation (through agent)	Page 2-158 Vermillion Basin When did BLM secure the right to require a unit for drilling? Unitization is a voluntary action and cannot be forced by the BLM. The 1% disturbance limit is phased development and unacceptable.	Under Section 4 of the Federal oil and gas lease form (3100-11), BLM can require the lessee to commit to a unit plan.
Energy and Minerals	Alex Zappavigna	I and the majority of Americans support the Bureau of Land Management's preferred alternative for the Little Snake Resource Management Plan, which would open up some of our nation's most pristine wildlands to oil and gas drilling and off-road vehicle traffic. The BLM should immediately start issuing permits for drilling and make effort to protect the unspoiled wildlands of northwest Colorado, including the Vermillion Basin while drilling.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will allow opportunities for mineral exploration and production while protecting resource values and resource uses. The management actions proposed under the Preferred Alternative will offer management flexibility to allow for acceptable levels of mineral development while ensuring that resource values and uses are protected. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative C (the Proposed RMP) of the Final EIS was revised to also close Vermillion Basin to new oil and gas leases for the life of the RMP.
Energy and	Glenne	The time is now to increase our alternative fuel uses and	See General Comment Response #5

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Minerals	Zaslowsky	technology. Where is our government incentive for alternative fuel development? New oil drilling is needless and harmful.	
Fish and Wildlife Habitat	A. Alldredge	Affected Environment - The discussion of "Big Game Species" affected environment (beginning on 3-48) considers only acres of habitat and provides little information regarding current population trends or sizes. Maps presented do identify areas of critical or crucial habitat and illustrate that these overlap with areas where gas and oil development will likely occur. The terms critical, crucial and severe are used in reference to habitats but are used interchangeably and not ever well defined. The BLM should define critical, crucial and severe in reference to habitats and be consistent in their use. A typographic error on page 3-51, second paragraph under the pronghorn section, lines 4 and. 5, needs to be corrected so that the reader can understand what is actually implied by "startling numbers" in the last sentence of that paragraph. I understand that the BLM is charged with habitat management and that Colorado Division of Wildlife (CDOW) is responsible for population management of big game species. The problem, however, is that both monitoring and input for adaptive management (Appendix F) allude to measurement of population characteristics. Thus, if population parameters are actually what will be monitored and used in adaptive management, discussion of big game species affected environment must include these characteristics to provide the necessary baseline for comparison. Simply put, I fail to see how proposed monitoring results can be compared to information presented in the affected environment section as it is currently presented? The BLM must provide adequate information in the affected environment section to establish baseline conditions for impact evaluation and implementation of adaptive management strategies that can be used to reduce impacts and develop mitigation actions. Because the Little Snake Resource Management Area provides habitats for Colorado's largest pronghorn populations, winter and yearlong habitat for all or parts of the two largest elk herds in the state, and historically the state's largest mule deer populations, it is absolutely essential that the BLM provide additional information on populations of these mammals. These data are available from the CDOW and published literature.	The level of detail in chapter 3 is appropriate for a landscape-level plan, and most of the information requested by the commenter is already in the Draft RMP/EIS. Chapter 3 includes a summary of the habitat conditions and population trends for each big game species. Figures 3-10, 3-11, and 3-12 (contained in Volume 2) include graphs of population trends for big game species. The maps presented in the Draft RMP/EIS do identify the variety of habitats (e.g., winter, summer, migration, crucial winter, etc.), and the oil and gas maps from the Draft RMP/EIS can be used by the reader for a comparison to obtain the information the commenter is requesting. Additionally, chapter 4 of the Draft RMP/EIS reports the acreages of overlap between big game habitat and oil and gas stipulations. Critical habitat, crucial winter range, and severe winter range are defined in chapter 7. The big game section in chapter 3 has been reviewed to ensure the use of the three terms is appropriate.
Fish and Wildlife Habitat	A. Alldredge	Environmental Consequences - My concerns with this section of the DEIS begin on page 4-42 with analysis assumptions. The first assumption: "If monitoring reveals that mitigation is unsuccessful in precluding significant impacts, immediate measures to prevent	The commenter is questioning assumptions that were made for analysis purposes, not decisions or commitments of resources. This assumption reflects that BLM will adhere to its legally required standard

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		further impacts would be implemented as appropriate to the species affected." Nowhere in the document do I find any information about a monitoring program that would be adequate to meet this assumption. Appendix F suggests that most of the monitoring will be conducted by CDOW and will include telemetry studies. Is there a financial commitment to these studies and are personnel available to conduct them? I know that CDOW budgets are stretched to the limit and doubt they have funding available to conduct monitoring adequate to provide data necessary for adaptive management suggested in the DEIS. Secondly, the above assumption is contingent not only on excellent monitoring protocols, but also on rapid response and an unproven capability to "prevent further impacts." I find no indication that this rapid response is achievable nor do I find reference to what sorts of "immediate measures" might be evoked. Most often there is lag in population responses to habitat disturbance. Quite likely by the time a population change is detected, it may be too late to remedy the situation; all the more reason for a detailed monitoring plan and clarification as to just how impacts will be ameliorated or mitigated. BLM will evoke "immediate measures" to reduce or prevent impacts to wildlife species. The second assumption (4-42) is again a good assumption, but how will the BLM ascertain what disturbance was detrimental to the population and what population parameters would be used in this evaluation? Identification of population parameters to be measured, as required in this assumption, would dictate monitoring protocols. The BLM must provide a thorough discussion of a monitoring protocol that would allow fulfillment of their assumptions and the public needs assurances that the BLM will evoke "immediate measures" to reduce or prevent impacts to wildlife species.	to prevent unnecessary or undue degradation of public lands. Regardless of this fact, the development of specific monitoring methodology is not an RMP level decision. The Draft RMP/EIS does include information in both Appendix F and Appendix O concerning general monitoring requirements. The actual monitoring methodology/protocols and any applicable mitigation actions would be developed during implementation planning to ensure it is tailored to site-specific conditions. Additionally, establishing specific monitoring methodology in an RMP would require the specified methodology unless BLM undergoes an RMP amendment. This would reduce BLM's flexibility to employ the most up-to-date scientific and proven monitoring methodologies. Lastly, requesting, allocating or committing funding is not an RMP-level decision. BLM RMPs do not control CDOW budgetary resources. However, BLM has worked closely with CDOW in developing the EIS and the Proposed RMP (Alternative C).
Fish and Wildlife Habitat	A. Alldredge	The discussion of big game migration corridors is a good one, but currently, big game animals in the RMPPA migrate across broad areas of the landscape and are rarely restricted to bottlenecks or narrow corridors. I am pleased that the BLM has considered migration but what concerns me here is the last sentence in paragraph 1, page 4-44, which says, "developers could claim economic hardship and, therefore, not have to implement recommended mitigation measures." Does this statement apply only to developers of coal resources or does it apply to all potential development in the area? It is disconcerting that nothing in this document would be binding if "economic hardship" or pre-existing conditions of a lease would allow a developer to avoid reducing or mitigating impacts. The BLM should provide assurances that	The Draft RMP/EIS includes stipulations to be implemented on all new mineral exploration and development projects. However, the impacts being questioned are in relation to existing leases. The Draft RMP/EIS does note existing leases in question are for oil, gas and coal. However, a valid existing lease conveys certain rights of development to the leaseholder. A stipulation cannot be added to an existing lease after the lease is issued. Conditions of approval may be added, but if the collective restrictions from those added conditions make development economically unfeasible, the leaseholder could claim BLM misrepresented the

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		developers will be required to minimize and mitigate impacts to big game animals, their habitats and migration areas.	stipulations needed on the given area when the lease was offered. As a result, the Draft RMP/EIS is accurate in including the potential impacts from mineral development on existing leases that may not implement the noted mitigation measures.
Fish and Wildlife Habitat	A. Alldredge	Paragraph 2 (4-44) acknowledges that there are considerable acreages of land within the RMPPA having high potential for oil and gas development and that these acreages overlap big game winter ranges. The BLM further acknowledges (3-99) that as of 2005, 60% BLM administered lands were already leased for energy development. Please clarify how much of this 60% is federally owned minerals and how much is split estate minerals. Because of existing leases, regulation of surface disturbance and mitigation requirements in the DEIS may be precluded and never implemented. Experience has taught us that requirements not stipulated in lease agreements are, by in-large, not enforceable. Thus, much of the suggestions for limiting and/or mitigating impacts to big game animals may never actually be required. The BLM must indicate the extent to which their recommendations for reduction and mitigation of impacts will actually be implemented. The RMP/DEIS may be misleading because it indicates potential for protection for big game animals and their habitats, when, in fact, most of the actions suggested cannot be implemented because of existing leases on 60% of the planning area.	The Draft RMP/EIS already notes both the acres of BLM surface estate and the acres of federal mineral estate that have existing leases. These percentages have been updated to reflect additional leases and changes in land ownership. Additionally, the Draft RMP/EIS Map 3-30, showing existing oil and gas leases, has been updated in the Proposed RMP/Final EIS. Readers can use this updated map, along with the wildlife habitat maps and oil and gas leasing alternative maps, to determine where overlap occurs. Concerning impacts to wildlife from the existing leases, analysis of Alternative A (No Action) includes an analysis of impacts from leases with the existing stipulations.
Fish and Wildlife Habitat	A. Alldredge	The discussion of disturbance (4-44) says that "the average surface disturbance per oil and gas well pad would amount to 28 acres" and goes on to allocate these acres to pad, road and pipeline uses. Page 2-17, where we are first introduced to the criterion for limiting habitat fragmentation says, "If it is assumed that each facility occupies 8 acres," following that, the 8-acre figure is used to calculate the 5% disturbance factor for each 160 acre block of habitat. If 28 acres are actually disturbed for each facility then this is the figure that should be used in calculating the 5% threshold. A more than threefold increase from 8 acres to 28 acres would substantially alter the 5% calculations. The BLM must provide a consistent and realistic estimate for acres of surface disturbance associated with gas/oil well pad development for evaluation of impacts and limits on surface disturbance.	This section has been modified in the Proposed RMP/Final EIS to make this assumption consistent. When the cooperating agencies developed the sagebrush protection approach, they assumed there would be 8 acres of disturbance per well. Wildlife biologists determined that 8 acres of surface disturbance in a 160-acre area would be an acceptable target from a habitat standpoint. Eight acres disturbed out of 160 acres is 5%. The discussion on page 2-17 references 8 acres to explain how the cooperating agencies and BLM came to its determination that 5% was appropriate, to show that the agencies did not choose this number arbitrarily. The fact that the RFD employs different assumptions does not invalidate the premise that agency scientists believe limiting disturbance to an average of 8 acres in a 160-arce area is an appropriate goal.

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Fish and Wildlife Habitat	A. Alldredge	The remainder of this section provides some generic discussion of impacts regarding big game responses to anthropogenic disturbances but fails to include some of the most recent and important data. This omission is critical when considering the 5% limitation on surface disturbance. Sawyer et al. (2005, 2006) and Berger et al. (2005) provide relevant data regarding mule deer and pronghorn responses to gas and oil development in habitats similar to those found in the RMPPA. Their results suggest that the approach taken in the Little Snake RMP is probably insufficient in limiting habitat fragmentation. The RMP indicates (2-17) that, on average, there should be no more than "one facility for each 160 acres within the project area leaving larger blocks of habitat undisturbed." Berger et al (2005) report that habitat patches must be at least 600 acres to be used by pronghorn, thus, care would need to be taken in facility location to assure that habitat patches in excess of 600 acres are actually maintained and that these patches are accessible by big game animals. Limiting disturbance to 5% of the lease area to limit habitat fragmentation (2-17) seems an admirable objective in the face of pressures of oil and gas development demands. There are, however, major problems with this objective. It is my understanding that developers have the option to enter into this "agreement." If they do not, they are subject to winter timing limitations. Appendix E suggests that timing limitations could be waived based on other criteria but the shopping list of topics presented does not indicate how these topics might be applied or what would constitute approval or disapproval. The BLM's past history does not speak favorably to enforcing timing limitations. For example, the BLM received over 200 requests for exemptions from winter limitations on the Pinedale Anticline and less than 12% of these were denied (USDOI BLM 2007). There does not appear to be much incentive for developers to agree to limit surface disturbance activities when they are reasonably assured that they can get restrictions waived. The BLM must clarify, in a quantitative manner, exactly what information would be used in granting exemptions and assure that they will adhere to timing limitations in critical wildlife habitats.	Chapter 4 of the Proposed RMP/Final EIS has been revised to include impact specifics that were not included in the Draft RMP/EIS. However, most of the impacts from the citations provided by the commenter were already included in the Draft RMP/EIS. The simple lack of the commenter's preferred citation does not result in a legal or scientific deficiency in the impact analysis. Concerning the 5% disturbance ceiling and the 600 acres noted by Berger, the Proposed RMP/Final EIS has been revised to require both 1% and 5% disturbance limitations, as well as a Plan of Development that would result in the preservation of large unfragmented patches of habitat. While the disturbance of the entire area would average less than 1% or 5%, there would likely be areas that would be more heavily developed as well as areas with substantially less development. This would maintain large blocks of habitat for wildlife use while allowing for mineral development. These impacts have been added to chapter 4 of the Proposed RMP/Final EIS. Concerning the volunteer nature of the ceilings on surface disturbance, the language has been clarified in the Proposed RMP/Final EIS to note that such stipulations would be required for all new leases, but existing leaseholders could have seasonal drilling stipulations waived if they agree to abide by the disturbance ceilings. New stipulations cannot be added to an existing lease after the lease has been issued. However, clarifying the information that would be used to grant every possible waiver, modification, or exception is not an RMP-level decision. The conditions under which a waiver, modification, or exception to a stipulation may be granted vary temporally and spatially. Appendix E of the Draft RMP/EIS includes criteria that may be considered by BLM authorized officers when determining whether to grant such a waiver, modification, or exception. In the end, as noted in Appendix E, a request for waivers, modifications, or exemptions undergoes an RMP and NEPA compliance review to ensure the action is consistent

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			with the RMP's goals and objectives. Simply citing one BLM office's rate of denying lessee requests for waivers without noting the conditions of the approved waivers does not automatically lead one to apply a similar approval rate to every waiver submitted at every BLM office. Site-specific conditions drive the request for and approval of waivers, modifications, or exceptions, and they cannot all be analyzed or presented in the EIS.
Fish and Wildlife Habitat	A. Alldredge	All habitats are not created equal and thus, in order to evaluate the efficacy of the 5% disturbance limitation, we would need to know just what habitats would be disturbed and how the disturbed habitats are distributed across the landscape. Sawyer et al (2005, 2006) report major shifts of mule deer from "preferred" habitats to more "marginal" habitats and a 46% reduction in wintering populations on the Pinedale Anticline resulting from gas and oil development that directly disturbed about 2% of crucial winter habitat. The Little Snake RMP/DEIS proposes, that at a minimum, two and a half times this amount of habitat could be disturbed by gas/oil development within a lease area at any one time. Furthermore, the "bait" if you will, to induce developers to "buy into" limiting habitat disturbance is that if they "opted" to do so, would be that the BLM would grant "exemption to big game and sage-grouse timing limitation stipulations." Thus, disturbance activity could be allowed during the most critical period of the year for big game and sage grouse and this disturbance could cause impacts far beyond what the BLM indicates in the DEIS. Impacts resulting from this magnitude of surface disturbance and associated human activity during the critical winter season could be deleterious to big game animals. Additionally, Sawyer et al. (2006) demonstrated that mule deer avoided areas up to 3 miles from wellfield activity, thus the mere physical footprint of development does not encompass the total ecological footprint. A more realistic calculation of the 5% disturbance would be to consider effective habitat loss and base calculations on the ecological footprint of developed areas which, for big game animals, could extend 3 miles in all directions from the point of disturbance. Habitat fragmentation is not a simple matter of percentage of habitats disturbed and instead depends on species affected, timing, specific habitat patches impacted and the location of these habitats across the landscape (see: D'Eon et al. 2002, Franklin et al. 2002, Jaeger 2000, McGarigal and Cushman 2002, and Weller et al. 2002). The BLM must be more thorough and forthright in acknowledging potential impacts to big game animals	BLM has updated the management of sagebrush habitat, including big game habitat, in Alternative C in chapter 2 of the Proposed RMP/Final EIS to include a 1% and 5% disturbance ceiling and a requirement for a Plan of Development that maintains large blocks of unfragmented habitat. BLM understands that habitat values vary across the landscape. This is evident in the different stipulations on habitats of varying value, as developed by working with CDOW and review the most up-to-date scientific literature. However, at the RMP-level, it is impossible to know what habitats would be disturbed and how the disturbed habitats are distributed across the landscape. Sawyer et al. reports the results of monitoring on a full-field gas development where such information is known and has already occurred. Additionally, impacts of wildlife displacement by mineral activities, which is identified in the Draft RMP/EIS, vary based on topography and the availability of adjacent habitats that are not developed. Just because development in the Pinedale area resulted in a 46% reduction in wintering populations does not indicate that there will be similar reductions in the RMPPA. Differences in topography, habitat values, and management will result in differences in impacts. The area analyzed by Sawyer et. al. did not require the maintenance of large blocks of unfragmented habitat. As a result, just because only 2% of the crucial winter habitat was disturbed doesn't address the location and distribution of the disturbance, both factors determined and analyzed at the implementation-level, not the RMP-level. While disturbance could be allowed in portions of the habitat during critical

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		from their proposals and admit that their proposal for limiting impacts and habitat fragmentation may not be adequate.	periods, the vast majority of the area, including large block of unfragmented habitat, would experience no development whatsoever. As noted in the Proposed RMP/Final EIS, this will provide more protection to wildlife than seasonally avoiding drilling in critical periods, but allowing such development during the summer, resulting in decreasing the actual value of the habitat, even though the disturbance didn't actually disturb the individual animals. Both the Draft RMP/EIS and the Proposed RMP/Final EIS describe impacts to wildlife species from mineral development, and do not imply that there won't be any impacts from such development within the RMPPA.
Fish and Wildlife Habitat	A. Alldredge	In my opinion, there are additional problems with the proposal to limit habitat fragmentation. Page 2-17 indicates that operators must continually meet the 5% minimal disturbance criteria but there is no indication of who will monitor surface disturbance or how this will be monitored. This seems like a significant commitment of personnel to provide almost up-to-the-minute data for surface disturbance. Does the BLM have personnel and capability to provide necessary monitoring and oversight? There also needs to be clarification as to what constitutes the size of the lease area upon which this 5% will be calculated. Then there is the question of what happens when the wells or lease sell to another operator. If the habitat fragmentation agreement is not part of the lease, is the agreement still binding when the lease sells? Lastly, the BLM must do a better job of describing impacts to big game animals on lands where disturbance will not or cannot be limited to 5%.	Concerning who will perform the monitoring, the language presently in the Draft RMP/EIS, Appendix O, is sufficiently clear. The first sentence of the appendix notes that it is the lessee's responsibility to use "reclamation practices." The activities that constitute those reclamation practices are defined throughout the Appendix, but if the responsibility to perform those activities is not specifically identified, it would default to this first sentence, that is, the lessee. Additionally, the section discussing "Maintaining the Project Record: Baseline Measurements, Monitoring, and Updating PODs" relative to the sagebrush protection approach has been expanded in the Proposed RMP/Final EIS. The identification of the area to which a 1% or 5% disturbance ceiling would be applied has also been clarified in the Proposed RMP/Final EIS. Concerning transfer of a well or lease to another operator, any development on the lease must comply with the approved Plan of Development that identifies how the development will be maintained within the disturbance ceilings while maintaining large blocks of unfragmented habitat. No new development would be allowed in the lease area until it complied with the Plan of Development for the area. Finally, chapter 4 of the Proposed RMP/Final EIS has been revised to better note the impacts to wildlife on areas where a lessee chooses not to opt into the surface disturbance limitation program. Impacts from other,

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			more standard mineral developments are already contained in chapter 4.
Fish and Wildlife Habitat	A. Alldredge	Criterion #1 says, "Upon successful reclamation, reclaimed areas would no longer be counted towards the 5% limit" Appendix 0 defines successful reclamation, but information presented there is inadequate. Furthermore, page 0-2 indicates that successful reclamation would ultimately be measured by soil "erosion less than or equal to two times the allowable amount." Thus it appears that successful reclamation will be ultimately determined by soil stability and this may have nothing to do with vegetation cover. There is not enough detail regarding how successful reclamation to a vegetation community will be monitored. There should be more detail on recommended seed mixes not just a statement that species would be "preferably native." In some instances, the use of non-natives can be beneficial to limit weed establishment and stabilize disturbed soils, but these non-natives should ultimately be replaced with indigenous species. Eradication of noxious weeds must be also addressed. Furthermore, stating that, "some presence of a desirable woody species is required," is unacceptable. Big game winter ranges are being disturbed and big game winter survival is dependent on availability woody shrubs. Reclamation with only herbaceous material will not meet winter habitat needs for big game animals. In order for a reclaimed area to be subtracted from the 5% surface disturbance because of presumed successful reclamation, shrubs must be established such that they are representative of the surrounding, undisturbed area. Baker (2006) reports that reclamation of sagebrush communities such as are found in the Little Snake RPA could take 50-150 years. The BLM should require reclamation to a functioning sagebrush and shrubland community before disturbed areas may be excluded from the 5% disturbance figure. Such a requirement would reduce impacts to big game animals not only by providing vital habitat but also by slowing the pace of development.	Appendix O has been revised in the Proposed RMP/Final EIS to add detail to successful final reclamation, as well as the identification of minimum reclamation actions.
Fish and Wildlife Habitat	A. Alldredge	Cumulative Impact Analysis - The cumulative impact section of the RMP/DEIS is inadequate and provides no specifics or quantification for impacts to big game species. Increased pressures from recreation, livestock grazing, forestry practices and energy development are impacting big game and their habitats not only on the planning area, but also on adjacent lands. Big game animals are extremely mobile and routinely cross management area boundaries in their seasonal migrations. During these seasonal movements they integrate environmental impacts across a broad landscape. The	The Cumulative Impacts Section was revised to better describe impacts from adjacent land owners and management agencies, as well as reasonably foreseeable cumulative actions identified by cooperating agencies, the BLM interdisciplinary team, and commenters on the Draft RMP/EIS.

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		BLM must expand their discussion of cumulative impacts to better quantify the array of impacts imposed on big game animals at the landscape level. This task should be feasible and of minimal cost considering current GIS capabilities and the attention being given environmental impact analysis throughout the area.	
Fish and Wildlife Habitat	Gundl Bhutani	With heavy-handed oil and gas development encroaching on the resource area from all sides - including an additional 4,200 proposed gas wells spanning across the Wyoming border into the Little Snake's Hiawatha area - the importance of protecting these remaining undisturbed lands cannot be overstated. We can learn much from recently conducted research on the devastating effects of aggressive oil and gas development in neighboring states. For instance, in Pinedale, Wyoming, scientists found that mule deer herds declined to almost half their previous size in the first four years of gas development. Pronghorn, elk and sage grouse all face similar risks.	The Draft RMP/EIS chapter 4 addresses the impacts of mineral development to wildlife. The Proposed RMP/Final EIS has been reviewed and revised, as necessary based on recent research, to ensure the noted impacts are accurate.
Fish and Wildlife Habitat	Susan Birch	Alternative D is the most viable strategy for protecting Northwest Colorado's special places while still providing for some energy development and motorized recreation where appropriate. The importance of protecting these remaining undisturbed lands cannot be overstated. Recently conducted research has shown the devastating effects of aggressive oil and gas development in neighboring states. In Pinedale, Wyoming, for example, scientists found that mule deer herds declined to almost half their previous size in the first four years of gas development. Pronghorn, elk and sage grouse all face similar risks.	BLM has reviewed the best available scientific research pertaining to energy development and its impact to wildlife. The restrictions found in Proposed RMP (Alternative C) reflect this scientific review.
Fish and Wildlife Habitat	Black Canyon Audubon Chapter 28478	The rolling reclamation idea is a good starting idea, but to be meaningful, it needs to include the area impacted by fragmentation, not just actually disturbed ground. This might be everything within a half mile of roads or pads, and of course would be a larger percentage. We appreciate your mention of fragmentation of sage and other habitats, but it needs to be more strongly considered, especially in special areas such as the Vermillion Basin, Sage Grouse leks or brooding areas, or prairie dog towns.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS. The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible. Similarly, there are too many variables to be able to define a specific distance from roads and facilities which might be considered disturbed. These areas would be mapped when a lease proposal is received by BLM.
Fish and Wildlife Habitat	David Bray	Table 2-42 identifies by wildlife species areas closed to OSV use. For the most part all of these areas except big game and sage	Alternative C/Proposed Plan has been updated be to allow over-the-snow vehicles only in areas where

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		grouse crucial winter range, and bald eagle winter perches and critical night roosts do not conflict with OSV use. I need to point out that my discussion here refers to only snowmobiling as the OSV use and does not include other OSV use such as snow cats the communication industry or electric companies may use. In general snowmobiling is limited by snow depth, to get off an existing road and not tear up a machine, a snow depth of approximately two feet is needed. Deeper in some areas depending on the size of rocks in the area. West of Craig, where most of the proposed closure to OSV use occurs, the season of use for snowmobiling may run from late December to mid to late February depending on the year. These dates are probably a worst case scenario, most years the snow depth is not there to snowmobile throughout this time period. Therefore the majority of the OSV use in this area does not conflict with nesting and birthing areas should not be closed to OSV use. One exception for sufficient snow depth would be areas over approximately seventy five hundred feet and north slopes. These areas would be more dependable for obtaining and keeping the necessary snow depth. However this dependable snow depth will also insure the area is not used for nesting or birthing when there is sufficient snow depth to snowmobile.	snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses. BLM has reviewed the best available scientific research pertaining to OSV use and its impact to wildlife. The restrictions found in the Proposed RMP reflect this scientific review.
Fish and Wildlife Habitat	David Bray	Closing big game crucial winter range to OSV use is not justifiable. First of all, most snowmobiling (riding for the sake of riding) takes place in areas that the snow depth has moved big game out of and into areas without or at least with less snow. Second, the Colorado Division of Wildlife (DOW) allows big game hunting through the end of February in Northwest Colorado. After December 31st big game hunting is limited to private land but the principal is still there. One group of biologist (DOW) is allowing big game to be disturbed on crucial winter range, by hunters and another group of biologist (BLM) is singling out another form of recreationist and attempting to close crucial winter range to OSV use. Third, since there is no justification or data presented in the Draft supporting closure of big game crucial winter range to use by OSV, I assume the biologist has stereotyped snowmobiling. Personal observations of wildlife while wildlife watching, hunting, snowmobiling and riding OHVs for the past twenty years in northwest Colorado has given me a strong understanding of big game animals reaction to man's recreational activity in this area. In the winter, the distance big game animals move when disturbed by man's recreational activity, except for hunting, is affected by the topography and cover. The more there is of either the shorter the distance moved. How long they stay out of an area is certainly affected by what disturbs them. Big game	Alternative C/Proposed RMP has been updated be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses. BLM has reviewed the best available scientific research pertaining to OSV use and its impact to wildlife. The restrictions found in the Proposed RMP reflect this scientific review.

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		animals in northwest Colorado react the greatest to a man on foot or what many may look like a man's silhouette. Deer and elk that winter around the base of Black Mountain are not dispersed when a snow cat or snowmachine headed for higher elevations is driven through them. Deer and elk stay in the same area all winter and have snowmachines driven through them every day. On weekends the machines run up and down the hill all day long. However, if a man on foot, skies or snowshoes disturbs them they will move out of the area. Sometimes for longer times than others. The justification is not there to single out OSVs and close big game areas to their use. There is already a law against harassing wildlife, if that is the problem then it needs to be enforced.	
Fish and Wildlife Habitat	Deirdre Butler	Oil and gas impact on Greater Sage Grouse can be somewhat limited by capping surface disturbance at one well per 640 acres and requiring best management practices including directional drilling.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS. BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain and restore sage-grouse populations and their habitats.
Fish and Wildlife Habitat	Colorado Division of Wildlife	Oil and gas and other federal minerals underlying CDOW State Wildlife Areas should not be leased or re-leased. If leased, CDOW requests that minerals underlying CDOW State Wildlife Areas carry NSO restrictions. CDOW owns several State Wildlife Areas (SWAs) within the boundaries of the LSFO. Most of the properties within the LSFO were purchased with Federal Aid in Wildlife Restoration (Pittman-Robertson) funds, making the U. S. Fish and Wildlife Service co-owners of the SWAs. These properties are owned and managed exclusively to provide key wildlife habitat and wildlife related recreation and are small in comparison to the extent of the LSFO. Oil and gas surface facilities on these SWAs will have a dramatic negative effect on both the habitat and recreational character of these special lands.	The Proposed RMP/Final EIS was modified to consider and analyze a no surface occupancy stipulation on all CDOW State Wildlife Areas under Alternative D.
Fish and Wildlife Habitat	Colorado Division of Wildlife	The plan continues to give inadequate attention to the effects of leasing and development of severed federal minerals on wildlife habitat. Private land habitats within the LSFO provide some of the most productive and crucial habitats for a wide variety of wildlife species. More than I million acres of those private habitats are underlain by federal minerals. The RMP focuses attention on management of BLM surface lands and associated minerals, but	As required by BLM policy, the mineral RFD was estimated regardless of surface or subsurface ownership. As such, analysis of the impacts to wildlife from mineral development, at the levels estimated in the RFD, addresses impacts from development on both federal surface estate, as well as split-estate with federal minerals. Additionally, the

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		does not appear to adequately address the management or impacts of leasing and development of severed federal minerals on wildlife habitats.	mineral leasing maps were developed using both surface and subsurface ownership maps. As such, any stipulation for wildlife applied to development on a federal surface/subsurface tract would also apply on a private or state surface/federal subsurface tract. This is noted in the Draft RMP/EIS in chapter 4 (page 4-1).
Fish and Wildlife Habitat	Colorado Division of Wildlife	Greater specificity in the method, timing and repetition of cumulative impacts analysis is needed in the RMP, including spatial analysis coupled with the Landscape Health Assessments to assess change. Regular cumulative impact assessment during the life of the RMP will be a significant step forward in evaluating and reacting to impacts rapidly enough to address them. It will be particularly important in assessing and modifying the sagebrush habitat functionality proposal as needed to adequately protect wildlife habitat. Landscape health assessments are useful tools for evaluating wide spread impacts to landscapes, but are unlikely to detect more concentrated impacts, such as road rights of way and oil and gas facility distribution. Furthermore, effects of management actions on wide ranging wildlife will be difficult to detect and evaluate with landscape health assessments. A regularly conducted, repeatable geospatial analysis of impacts and effects that cannot be measured by landscape health assessments will be a necessary adjunct to the LHAs. Factors evaluated should include those listed in Appendix F. Location, density and distribution of oil and gas surface facilities should be added to the factors in Table F-I.	The Record of Decision/Final RMP will include a monitoring section that further addresses some of the monitoring requirements by resource/use. Landscape health assessments are not, in and of themselves, a substitute for monitoring or a means to assess trend, but a public communication tool and a means to provide early warnings of resource problems when used in conjunction with quantitative monitoring and inventory information. Requiring specific monitoring measures would be inappropriate for a landscape-scale document. Site-specific monitoring will be described in activity level documents. Additionally, the specifics of all activity–level actions will be addressed by subsequent NEPA documents. Appendix M: The Adaptive Management Process for Implementation of Alternatives B, C, and D, acknowledges the challenges of using standards as system-level indicators and suggests a way to improve standards: “In addition to issues concerning measurability, standards fall short in assessing certain impacts, including cumulative effects. One area where the standards do not measure effects sufficiently and need further development is disturbance to wildlife populations. To measure cumulative effects, BLM would need to take a broader look at the landscape in addition to individual watersheds. One possible way to assess cumulative impacts would be to use digital photos or satellite imagery to assess habitat fragmentation and to correlate the fragmentation to known population trends. Integration of these new measurements into standards would be done during the creation of the AGD.”
Fish and Wildlife Habitat	Colorado Division of	More specificity is needed in the adaptive management criteria, particularly in the area of "floors" below which resources would not	Establishing such “floors” is not a land use plan decision, as defined in BLM’s 1601 planning

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	Wildlife	be allowed to fall during the application of adaptive management. Application of performance based standards and utilization of adaptive management and the other concepts rolled into the sagebrush habitat functionality proposal in the plan is admirable. The implementation of an effective adaptive management process is critical to the success of the sagebrush habitat functionality proposal and other non-traditional approaches incorporated in the RMP. While much of the operational detail of an effective management plan should be left for follow-on documents like the Assessment Guidance Document, basic minimums ("floors") below which wildlife resources will not be allowed to fall should be included in the RMP. CDOW DAU Management Plans (CDOW various years) provide information on big game population levels, male/female ratios, and young/adult ratios that could be used to develop reasonable floors. Similarly, the Northwest Colorado Greater Sage-Grouse Conservation Plan (Northwest Colorado Greater Sage-Grouse Working Group 2006) and the Colorado Greater Sage-Grouse Conservation Plan (CDOW 2007a) provide population target ranges for the Northwest Colorado (most of LSFO) and Eagle-South Routt (southeastern LSFO) greater sage-grouse populations. Survival/recruitment of first year big game animals can provide a responsive indicator of big game herd health that would be useful as an indication of trend with relation to the floor. For greater sage-grouse, adult female survival and chick survival/recruitment are similarly important and responsive measures (Miller et al. 2006).	handbook. Additionally, identifying “floors” below which resources would not be allowed to fall does not consider the source of the decline. Therefore, requiring stipulations if a “floor” is exceeded may not necessarily address the problem. However, in response to this CDOW concern, a discussion of how BLM would work with other agencies and interested parties to achieve the goals and objectives, including CDOW’s population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan has been added to the Proposed RMP/Final EIS.
Fish and Wildlife Habitat	Colorado Division of Wildlife	Much of the wildlife data in Chapter 3 is outdated, being that provided in 2004. Updated data was provided during development of the draft RMP but has not been universally adopted into the draft. CDOW will provide the newest data available for completion of the final EIS document. Specific areas where more current information is available include the big game population graphs in Figures 3-10 to 3-12, the greater sage-grouse lek count data in Table 3-16, and the greater sage-grouse management zones portrayed in Figure 3-20. The greater sage-grouse management zones have been expanded to incorporate sage grouse habitat throughout the LSFO (Northwest Colorado Greater Sage-Grouse Working Group 2006). The current Figure 3-20 represents an older data set limited to the boundary of Moffat County.	BLM used the datasets that were available during the development of the Draft RMP/EIS. As data are constantly being gathered, all new or upcoming monitoring cannot be integrated into the planning effort and still allow the process to continue in a timely manner. The Proposed RMP/Final EIS has been revised with new data where the new data has been collected at a large enough scale to update the information used in the Draft RMP/EIS and still maintain reasonable comparability. Additionally, if the new data did not result in a change of the trend described in the Draft RMP/EIS it was less likely to be included in the Proposed RMP/Final EIS, as the landscape-level trend data is more important for analysis purposes than the specific data points used to establish that trend.
Fish and	Colorado	Several approaches to mitigating impacts of energy development	Stipulations on a lease must be known at the time

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Wildlife Habitat	Division of Wildlife	have been tried or proposed. The classic approach used by BLM who manages leases on Federal mineral rights, is to apply stipulations to protect wildlife (conditions on the operator) at the time the lease is granted. For a variety of reasons, including a weak scientific knowledge base, failure to consider cumulative effects, etc., this approach has largely failed. Creating refuges in time and space is emerging as the leading strategy for reducing impacts, both because stipulations have not been completely effective and because they are very costly to industry. Stipulations are then relaxed or even eliminated on non-refuge areas. Industry has shown or indicated willingness to fund research, monitoring, and mitigation.	the lease is offered so the lease-holder can be aware of the amount of mitigation that is required and determine if such a lease would still be profitable. The Proposed RMP/Final EIS is the document that analyzes stipulations prior to a lease; therefore, all proposed stipulations on potential leases must be addressed in the Proposed RMP/Final EIS. Management that limits the amount of disturbance, thus creating unfragmented blocks of sagebrush habitat in the remainder of the area, has been incorporated in chapter 2 of the Proposed RMP/Final EIS. Subsequent industry funding of research, monitoring, and mitigation is outside the scope of the RMP and best addressed on a case-by-case basis.
Fish and Wildlife Habitat	Colorado Division of Wildlife	The Piceance basin, which winters the largest migratory mule deer herd in North America and is already the site of tremendous energy extraction development, represents a special problem, and will be considered separately. At this time we are not recommending establishing additional "do not drill" refuge areas for deer in northwest Colorado over and above those established for sage grouse. We anticipate that in much of NW Colorado the sage grouse refuges and the rotational aspect of drilling in occupied sage grouse habitat peripheral to core areas will protect deer, assuming BMPs and adequate mitigation are employed. We would definitely need to overlap important wintering areas on the sage grouse refuge areas to see to what extent this sage grouse protection protects deer habitat.	Chapter 4 of the Draft RMP/EIS (4.3.5) addresses interactions between oil and gas leasing and big game habitat. The Proposed RMP/Final EIS has been updated to show the interaction between the medium and high value sagebrush habitats and oil and gas management. In addition, Piceance basin, as shown on the commenter's figure 2, is not within the Little Snake RMPPA. Management decisions for this area are outside the scope of this document.
Fish and Wildlife Habitat	Colorado Division of Wildlife	In the Piceance basin, over 94% of the natural gas resource has already been leased. Establishing refuge areas for deer (recall we are not recommending any in that location for sage grouse) will be extremely difficult given that energy companies have much invested in purchasing mineral and surface rights, and much to lose because of the value of the available energy resource. Even imposing additional restrictions will be difficult and in most cases could not be implemented as lease stipulations on existing leases without being considered a violation of lease rights granted. Thus implementation of BMPs (Appendix 1) or establishment of refuge areas will have to be voluntary, and make economic sense to the industry.	Piceance basin, as shown on the commenter's figure 2, is not within the Little Snake RMPPA. Management decisions for this area are outside the scope of this document. BLM agrees with the issues surrounding valid existing oil and gas leases. The voluntary sagebrush protection approach was developed with these constraints in mind.
Fish and Wildlife Habitat	Colorado Division of Wildlife	Therefore, in lieu of refuge areas we propose 3 areas with varying intensities of development/restrictions be established. Area 1. High Restrictions (Figure 2). The Piceance Triangle, which is	Piceance basin, as shown on the commenter's figure 2, is not within the Little Snake RMPPA. Management decisions for this area are outside the

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		that area encompassed by State Highway 64 from Meeker west to the mouth of Piceance Creek, then south on County Road 5 along Piceance Creek, then west on County Roads 20 and 88 to Yellow Creek, then south along Yellow Creek to County Road 24. From this juncture, the boundary follows the CDOW severe winter range demarcation which generally proceeds in an east, south-east direction across Black Sulphur Creek (~mile post 2 of County Road 26) to Hunter Creek, then east to lower Steward Gulch and County Road 5, then southeast on County Road 5 to Rio Blanco, and then north on Highway 13 to Meeker. This area has the highest average long-term densities of wintering deer in Piceance Basin. This critical deer winter range supports the migrations of deer into the upper White River. Proposed Restrictions: 1) Temporary cessation of lease operations or other seasonal timing restrictions to protect deer on highly critical segments of winter range. 2) Phased or rotational extraction plan would be developed, so that most of this area would not be impacted at any one time. 3) Clustering development to group surface locations of gas wells in a defined and concentrated geographic area. 4) Consolidating natural gas production facilities such as condensate and produced water facilities, compressors, three phased pipelines, roads, etc. 5) Administratively closing roads seasonally over a relatively large area. 6) Implementing remote telemetry to monitor gas wells. 7) Developing daily operating plans that minimize human disturbance within the defined area. 8) Conducting extensive habitat renovation of hayfields along Piceance Creek and its tributaries and acquiring water rights to maintain these fields in perpetuity to produce high quality standing forage for deer during spring and fall migrations. 9) Conducting extensive habitat renovation of pinyon juniper forests by hydro-axing, roller-chopping, or controlled burning in conjunction with reseeding and protection from livestock during critical growing seasons to improve long-term quality of deer winter and spring forage. 10) Conducting extensive habitat renovation of sagebrush and mountain shrub habitats through fertilization, appropriate use of	scope of this document.

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		herbicides, or burning (not sagebrush) in conjunction with reseeding to improve long-term quality of deer winter and spring forage.	
Fish and Wildlife Habitat	Colorado Division of Wildlife	Area 2. Low Restrictions (Figure 2). The western Piceance Basin, which is the area encompassed from the mouth of Piceance Creek at Highway 64 west to Calamity Ridge extended to Highway 64 (the boundary between GMUs 21 and 22), then south along Calamity Ridge and the Cathedral Bluffs to the head of Black Sulphur Creek, then east on County Road 26 to -mile post 2 of County Road 26, then the boundary follows the CDOW severe winter range demarcation which generally proceeds in a northwest-west direction to the juncture of County Road 24 with Yellow Creek, then north along Yellow Creek to County Roads 88 and 20, then east to County Road 5, and then north on County Road 5 and Piceance Creek to Highway 64. This area contains low to moderate densities of wintering deer in the Piceance Basin. Proposed Restrictions: 1) Temporary cessation of lease operations or other seasonal timing restrictions to protect deer on highly critical segments of winter range would not be invoked. 2) Phased or rotational extraction plan would be developed, so that most of this area would not be impacted at any one time. 3) Administratively closing roads seasonally only in the most critical areas. 4) Invoking extensive habitat renovation of hayfields along Yellow Creek and tributaries and acquiring water rights to maintain these fields in perpetuity to produce high quality standing forage for deer during spring and fall migrations. 5)Invoking habitat renovation of pinyon juniper forests in selected areas by hydro-axing, roller-chopping, or controlled burning in conjunction with reseeding and protection from livestock during critical growing seasons to improve long-term quality of deer winter and spring forage 6)Invoking habitat renovation of sagebrush and mountain shrub habitats in selected areas through fertilization, appropriate use of herbicides, or burning (not sagebrush) in conjunction with reseeding to improve long-term quality of deer winter and spring forage. 7) Use off-site mitigation to alleviate impacts to mule deer. 8) Protect/conserve wildlife habitat through land conservation and/or mitigation banking.	Piceance basin, as shown on the commenter's figure 2, is not within the Little Snake RMPPA. Management decisions for this area are outside the scope of this document.
Fish and	Colorado	Area 3. Moderate Restrictions (Figure 2). The southern Piceance	Piceance basin, as shown on the commenter's figure

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Wildlife Habitat	Division of Wildlife	Basin which is that area lying south of Piceance Creek County Road 5 from Rio Blanco west to lower Steward Gulch, then west along the CDOW severe winter range demarcation to Hunter Creek, then northwest to Black Sulphur Creek at -mile post 2 of County Road 26, then west to the head of Black Sulphur Creek, then south and east following the boundary of GMU 22 to Rio Blanco. This area contains the transition and moderate to highly critical winter ranges within the Piceance Basin that are associated with deer that migrate to the Roan Plateau summer ranges. Proposed Restrictions: 1) Temporary cessation of lease operations or other seasonal timing restrictions to protect deer on highly critical segments of winter range would be invoked sparingly. 2) Phased or rotational extraction plan would be developed, so that most of this area would not be impacted at any one time. 3) Clustering development to group surface locations of gas wells in a defined and concentrated geographic area. 4) Administratively closing roads seasonally only in the most critical areas. 5) Invoking extensive habitat renovation of hayfields along Piceance Creek and tributaries and acquiring water rights to maintain these fields in perpetuity to produce high quality standing forage for deer during spring and fall migrations. 6) Invoking moderate levels of habitat renovation of pinyon juniper forests by hydro-axing, roller-chopping, or controlled burning in conjunction with reseeding and protection from livestock during critical growing seasons to improve long-term quality of deer winter and spring forage 7) Invoking moderate levels of habitat renovation of sagebrush and mountain shrub habitats through fertilization, appropriate use of herbicides, or burning (not sagebrush) in conjunction with reseeding to improve long-term quality of deer winter and spring forage. 8) Use off-site mitigation to alleviate impacts to mule deer. 9) Protect/conserve wildlife habitat through land conservation and/or mitigation banking.	2, is not within the Little Snake RMPPA. Management decisions for this area are outside the scope of this document.
Fish and Wildlife Habitat	Colorado Division of Wildlife	CDOW believes these 3 different levels of restrictions would allow industry more freedom to extract energy resources. However, CDOW considers the entire Piceance Basin to be of high value to an extremely important deer population. By relaxing restrictions on industry in portions of the Piceance Basin, CDOW is conceding that	Piceance basin, as shown on the commenter's figure 2, is not within the Little Snake RMPPA. Management decisions for this area are outside the scope of this document.

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		there could be significant and detrimental impacts on the mule deer resource. In exchange for these concessions, industry would agree to pay for the costs of: 1) the implementing the restrictions, such as habitat improvements and remote monitoring of wells, 2) to monitor the long-term results/impacts of these varied extraction restrictions on deer, and 3) pay for the costs of well-designed research projects to evaluate the relative short-term results/impacts of these varied extraction restrictions on deer. Some degree of adaptive management will be built in if mitigation measures prove inadequate.	
Fish and Wildlife Habitat	Colorado Snowmobile Association	CLOSURE TO OVER-THE-SNOW VEHICLES It appears that the proposed over-the-snow vehicles closures in Alternatives 3 and 4 may be related to wildlife winter habitat - but the document is not very clear about the specific reason for this proposal and, in fact, makes conflicting statements. It also fails to present evidence of analysis that would be required to make a giant leap from the current situation where 46,080 acres are closed to OSVs - to potentially 861,030 acres being closed to their use. NEPA clearly requires that such decisions be reached only after clear and reasoned analysis, which is typically site-specific versus broad-brushed. This document clearly does not meet that requirement. In the discussion about the Alternatives in Chapter 2 on page 2-20, it states that "The crucial winter habitat of big game species would be closed to surface disturbing activities from December 1 to April 30." Since this language is identical for Alternatives A (existing management), Alterative B (the preferred alternative), and Alternative D - how can this result in a Change, from winter travel currently being allowed by OSVs on 97 percent of the RMPPA, to allowing winter travel on only 36 percent of the area? And since there is no apparent change in policy (at least according to the way this information is presented in this section), how can this be the basis for closing up to another 814, 950 acres - nearly eighteen times the existing area - to OSV travel? It simply does not compute, so please provide better disclosure of the reasoning for this proposed change. Table 2-42 on page 2-110 outlines "Areas Closed to Over-the-Snow Vehicles, by Alternative." It is somewhat misleading in that not all of the twenty-two "Areas" listed in the table necessarily relate to the winter season or the entire winter season (Examples: elk calving area cloture is from April 16 to June 30; pronghorn fawning and bighorn sheep lambing closures are from May 1 to July 15, etc.). Furthermore, many of the areas pertain to only a 1/4 to 1/2 mile radius around identified use sites - so it would be improper, at this	Alternative C/Proposed Plan has been updated be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses. BLM has reviewed the best available scientific research pertaining to OSV use and its impact to wildlife. The restrictions found in the Preferred Alternative/Proposed RMP reflect this scientific review.

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		point in time, to identify any significant acreage and label it "closed." We believe this table needs to be revised to more accurately portray winter season issues (including the time period related to each potential closure) versus the 'everything possible under the umbrella' scenario currently presented. Additionally, it would be appropriate to better disclose exactly how many acres of 'closure' would be connected to each area definition (similar to what was done in Tables 4-12 through 4-15 in respect to big game habitat relative to oil and gas development) since it is now difficult to grasp the magnitude and importance of the twenty-two individual 'area' pieces.	
Fish and Wildlife Habitat	Colorado Wildlife Federation	CWF has focused on impacts to wildlife and applied the following mandatory requirement that is applicable to all resource uses and decisions affecting BLM lands: "In managing the public lands, the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b). This requirement must serve as a foundation for all analyses in the EIS and all activities undertaken pursuant to the Resource Management Plan (RMP). The preferred alternative for the RMP should emphasize resource conservation to preserve future use. FLPMA explicitly provides that BLM must consider the relative value of the resources involved. There are no replacements or substitutes for resources such as crucial wildlife habitats. We strongly believe that the preferred alternative must give special emphasis to conserving these wildlife resources. This is particularly essential in light of the unprecedented energy development in western Colorado and the cumulative impacts on wildlife habitat and wildlife populations. The preferred alternative does not satisfy this requirement. Although it contains some thoughtful provisions, the preferred alternative lacks terms to balance the substantial wildlife values that contribute significantly to our economy and quality of life.	BLM is mandated by law to comply with the provisions of the National Environmental Policy Act (NEPA), including the protection of sensitive resources while allowing for development and use of the nation's resources. The implementing regulations for NEPA require agencies to estimate the intensities of impacts to the human environment, as well as the resultant intensity based on the implementation of mitigation measures. The Draft RMP/EIS accomplishes this, explaining the impacts from energy development, in light of the various stipulations in the alternatives on fish and wildlife habitat.
Fish and Wildlife Habitat	Colorado Wildlife Federation	We support limiting the amount of disturbed area at any given time to the minimum needed to drill for the resources. However, 5 percent may be misleading. For example, noise from compressors can adversely impact bird reproductions. Due to a "spider web" effect, even that amount of acreage also can cause significant habitat fragmentation. Roads may be within the 5 percent criterion yet impose major impacts on migrations. Therefore, locations of disturbances must receive at least equal emphasis. Further, the option that would be offered to lessees to limit disturbance to 5 percent in exchange for waiver of seasonal use restrictions is applied on a lease by lease basis. To accommodate wildlife	Activity which can disturb wildlife is accounted for in the sagebrush protection approach through the requirement to submit a Plan of Development. The operator must show that it can reduce these impacts through minimizing oil and gas related activity (page 2-18). The approach is not necessary applied on a lease-by-lease basis. Page 2-18 of the Draft RMP/EIS, "The area of the project described in the POD could include multiple leases or units, either connected or not contiguous." Nothing in this approach limits the

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		resource needs, the limitation must be applied on a landscape scale rather than on a lease by lease basis.	size of project areas. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS.
Fish and Wildlife Habitat	Colorado Wildlife Federation	In addition to habitat matters, an impact of great importance is the practical reality of significant increases in “road kill” along routes that experience the heavy industry traffic associated with drilling operations. We receive a steady stream of field observations in Wyoming (such as Rock Springs to Pinedale) and on areas in northwestern Colorado under intense gas and oil development (such as wintering habitat 15 miles north of Baggs to the Colorado border – 100 dead deer; from the border to Craig – 50 dead deer; from Craig along Hwy. 13 through Meeker to I-70 – 200 dead deer and 75 dead elk, etc, etc.). This issue, too, must be addressed.	The potential for increases in vehicle collisions with big game is dependent on factors not known at the RMP-level of planning. NEPA completed prior to full-field development of oil and gas fields will consider site-specific habitat characteristics and analyze the potential for such mortality based on proposed road placements. Language was added to the Proposed RMP/Final EIS to acknowledge the increased potential for vehicle collisions in areas with increased road densities.
Fish and Wildlife Habitat	Kirk Cunningham	I'm not a hunter, so I don't have any strong opinions about preserving large game herds, but I do know that there are some habitat values for less common, even threatened, species (i.e. sage grouse) that need to be protected in sufficient amounts to prevent them from becoming truly endangered. I know that in the past, the BLM has treated sagebrush as a nuisance to remove in order to make the world safer for livestock. That type of habitat should have more respect in the Plan.	Sagebrush is an important component of wildlife habitat and is treated as such. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 of the Proposed RMP/Final EIS.
Fish and Wildlife Habitat	Margarita & Steven Downs	3. Impose Lease Stipulations on all areas of critical wildlife habitat (specifically; sage grouse and big game) and critical (imperiled) plant habitat.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS.
Fish and Wildlife Habitat	Form Letter #2	Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat.
Fish and Wildlife Habitat	Julian Friedland, Ph.D.	The BLM's plan should protect the sage grouse habitat found in the Resource Area, as it encompasses some of the best remaining habitat for this symbol of the sagebrush country. This habitat, especially lek sites, must not be disturbed by oil and gas drilling. The BLM's plan should also protect the white-tailed prairie dog colonies in the Resource Area. They are some of the largest remaining for the highly imperiled sagebrush native, and with	BLM has reviewed the best available scientific research pertaining to energy development and its impact to wildlife. The restrictions found in the Proposed RMP (Alternative C) reflect this scientific review.

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		adequate protection from oil and gas drilling and road building disturbance they could serve as a reintroduction site for the endangered black-footed ferret.	
Fish and Wildlife Habitat	Wade Haerle	I do not agree with the 4 mile radius for sage grouse habituate. I believe Moffat County has scientific evidence supporting a two mile or less radius for leks. I support the more localized science requirement over the arbitrary 4 mile radius proposed.	Local research has shown that over 75% of nesting females nest within a 4-mile radius of the lek. Since an objective of the Proposed RMP is to prevent disturbing 75% of nesting birds, greater sage-grouse nesting and early brood-rearing habitat within a 4-mile radius of a lek will be subject to a Controlled Surface Use stipulation from March 1 and June 30.
Fish and Wildlife Habitat	Rick Hammel	2.5.5.1, Page 2-16, Fish and Wildlife Goal E: BLM suggests that it encourage sport fisheries as long as it is not detrimental to native fish populations. Literature (Behnke; Fausch; Harig: and a great many others) states that native and exotic species of fish do not co-exist, due to hybridization or forage competition.	The potential for hybridization or forage competition would be addressed during site-specific planning. The objective merely notes that BLM would encourage sport fisheries when the impact to native fish populations would not be detrimental. The impacts would vary based on which sport fish is being managed for and what native species could be impacted. Both of these considerations would need to be made on a case-by-case basis at the project-level of planning.
Fish and Wildlife Habitat	Rick Hammel	Reduce Disturbance to Birds: Noise level (sound pressure level [SPL])'must be quantified. The statement really does nothing to quantify what the BLM is looking for in SPL. To be more specific, an example would be: "Reduce noise impacts from compressor stations by locating stations at least 2500 feet away from leks. Maximum Sound Pressure Level is 50dbA @ 50 feet. The SPL and distance must be determined by experts in wildlife noise pollution. The SPL should be monitored on a regular basis; once in the Spring of the year and once in the Fall." These BMPs must be outlined in the COA and are mandatory. Violations of these BMPs will result in cancellation of the APD, plus complete and immediate site restoration.	BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. As noted in the Draft RMP/EIS, “as new BMPs are developed, they may be added to [the] list of BMPs or may replace some of those now listed.” Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. BLM seeks to develop and apply BMPs to mitigate impacts from mineral development, as well as other uses. In addition to the BMPs identified in the Draft RMP/EIS, BLM would consider implementation of other BMPs to address specific issues identified at

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			the activity level.
Fish and Wildlife Habitat	Howard County Bird Club	On lands open to oil and gas development, we favor the recommendation of Colorado groups that surface disturbance in critical wildlife habitat be reduced by holding drilling to a maximum of one well pad per square mile. Best management practices should be required in all cases. We urge BLM to adopt further Sage-grouse conservation measures recommended by Colorado conservationists in their detailed comments on the draft plan.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions under the Proposed RMP/Final EIS will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development. BLM has reviewed the best available scientific research pertaining to energy development and its impact to wildlife. The restrictions found in the Proposed RMP/Final EIS reflect this scientific review. The magnitude, parameters and intensity of projects very considerably. Therefore, specific guidance on the implementation of many recommended BMPs would be provided on a case-by-case basis.
Fish and Wildlife Habitat	Howard County Bird Club	The Little Snake planning area, containing 1.3 million acres, is known for its large continuous blocks of sagebrush habitat, supporting Greater Sage-grouse, elk, mule deer and pronghorn. It also contains remarkable riparian habitat along the Yampa River and its tributaries. These habitat areas deserve secure protection in the plan through wilderness study areas, areas of critical environmental concern, and strict conditions imposed on oil and gas operations and off-road travel.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. In accordance with BLM Manual 1613-1.12, BLM identified special management for potential ACECs and existing ACECs in an array of management alternatives presented in chapter 2. Management considered in Alternative C was designed to protect endangered species, sensitive plants, remnant plant communities, sensitive habitat, scenic quality, and natural processes or systems, or other important and relevant values identified for each area. Additionally, existing special management area designation provides full protection of values, thus eliminating the need for special management attention afforded by an ACEC designation. The management action proposed in the alternatives will offer management flexibility to ensure resource values are protected while allowing acceptable levels of resource use that includes mineral entry, livestock grazing, OHV use, and oil and gas development.
Fish and	Henry Keesling	p. 4-234 Second paragraph: This statement is incorrect as presented. Provide and cite data that supports this statement.	Chapter 3 of the Draft RMP/EIS notes that elk across the RMPPA are at or above herd objectives, and

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Wildlife Habitat		Wildlife population reaching this level, and causing damage as indicated, would result in massive die-outs prior to causing the described impacts. The presented discussion is not supported by scientific documentation. Wildlife populations in the LSFO management area may be on the increase due to CDOW management for a "market economy" hunting experience. They have not, and will not, pose this problem. Wildlife impact at this level would conflict directly with the grazing program and ranchers. Sand Wash wild horse herd management area is the exception to this. Overshadowing any native wildlife impacts are major impacts resulting from the introduction of a non-indigenous animals, cattle, sheep, and horses, into the these ecosystems. This is documented in various Forest Service and BLM studies.	includes descriptions where the combination of livestock use with heavy use by large elk populations has resulted in decreasing and/or poor habitat conditions. As noted in chapter 4, this is a cumulative impact that, when combined with the impacts from the actions proposed in BLM's alternatives (i.e., livestock grazing), could result in the impacts noted. Additionally, as noted in the text, these impacts would not occur across the landscape, but in localized areas where the large wildlife population congregate. The impacts of hooves on soils and associated cultural resources from congregated large ungulates would be similar, whether from the hooves of domestic livestock, wild horses, or wildlife.
Fish and Wildlife Habitat	Kathy Kilmer	Put wildlife and habitat first by establishing sufficient limitations on industrial development and ORV use.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for motorized recreation mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of use.
Fish and Wildlife Habitat	Robert H. King, Dr.	The RMP should prioritize the protection of greater sage-grouse and big game native species critical to the vitality and character of Northwest Colorado by moving beyond the voluntary oil and gas limitations outlined in the draft plan, and requiring real, on-the-ground habitat protection with mandatory surface disturbance restrictions for essential breeding grounds, winter ranges, and habitat linkages.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production. The management actions proposed under the Preferred Alternative will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of mineral development.
Fish and Wildlife Habitat	Joy Master	1. Alternative D is the only one of the alternatives presented that provides a somewhat balanced approach to managing the resources of the area, including increased habitat protection for GRSG and other wildlife. All other alternatives are unacceptable, including the Preferred Alternative C. 2. In addition to other requirements of Alternative D, close the Critical Sagebrush Habitat areas that contain known GRSG leks and	Closing or applying no surface occupancy stipulations to the critical sagebrush habitat areas, which includes all areas within four miles of a sage-grouse lek site and the eight designated large patches of sagebrush habitat (Map 2-4 of the Draft RMP/EIS), was not considered a reasonable alternative because such restrictive stipulations on that large of an area would not meet BLM's multiple

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		nesting habitat, as shown on Map 2-4, to all oil and gas drilling within their boundaries (i.e. no surface occupancy in these areas). Directional drilling from the edges of these Critical Areas can be used to develop the oil and gas resources found beneath them. 3. In other habitat areas occupied by GRSG, limit oil and gas surface disturbance to one well pad per 640 acres and require best management practices, to minimize impacts on GRSG and other wildlife. 4. Protect the wildlife and habitat values of current proposed wilderness lands, including the Vermillion Basin, by closing them to oil and gas drilling and off-road vehicles.	use mission, or the purpose and need of the EIS. In addition, it would provide minimal protection to sage-grouse because the vast majority of these areas already contain valid existing leases. In preparing the Proposed RMP/Final EIS, BLM has reviewed updated scientific literature and has coordinated extensively with greater sage-grouse experts to develop an approach to better protect sagebrush habitat. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based). This would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance. Likewise, closing the areas from the Draft RMP/EIS Map 2-4 to off-road vehicles would be unnecessarily restrictive, as sage-grouse issues would be able to be addressed during travel management planning. In the Proposed RMP/Final EIS, there would be no high priority sagebrush habitat open to cross-country OHV use. OHV use in these areas would either be closed or restricted to existing routes (in the interim, designated routes when travel planning is completed within 5 years).
Fish and Wildlife Habitat	Caitlyn McKenzie	Increased uses throughout the RMPPA, including recreational use, grazing, and motorized and mechanized vehicle use, will critically affect wildlife populations and their habitat if not properly managed. Habitat management is necessary to minimize impacts on wildlife species and their habitats. Special attention must be given to many species, including but not limited to big game, white-tailed prairie dog, black-footed ferret, Canadian lynx, greater sage-grouse, raptors, migratory birds, and native fish.	The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing public use of the resources. Impacts to wildlife habitat resulting from management alternatives are provided in chapter 4. Management of federally listed threatened and endangered species, as well as designated critical habitat, and species and habitat proposed for listing, are directed by the Endangered Species Act. Under

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			BLM Manual 6840, BLM is required to manage habitat for candidate species for federal listing, BLM-determined priority (sensitive) species, and state-listed species in a manner that will ensure that all actions authorized, funded, or carried out by BLM do not contribute to the need for the species to become listed. Special attention was paid to special status, listed and candidate species, as well as big game and native fish. Please see chapter 2 fish and wildlife and special status species sections and chapter 3 special status species section.
Fish and Wildlife Habitat	Moffat County Commissioners	p. ES-4-Wildlife: The tone of the Wildlife Planning Issue is one of pedestaling and lobbying for wildlife above other uses whereas the tone of all other Planning issues is neutral and simply factual. Moffat County requests the tone be changed from one of political posturing to one of describing the issue.	See General Comment Response #32
Fish and Wildlife Habitat	Moffat County Commissioners	2-41 White-Tailed Prairie Dog ACEC: Moffat County does not support protecting prairie dog towns less than 10 acres in size or placing timing limitation stipulations on towns greater than 10 acres in size. Prairie Dogs are not considered a rare species and therefore do not need additional protection. In fact the science suggesting the need for their protection is sketchy at best. In fact, when the Colorado Wildlife Commission restricted hunting seasons on Prairie Dogs in 2006, they remarked that the science did not justify restricting the seasons, but rather it was political pressure. We request BLM doesn't fall to the same political pressure. At a minimum Appendix M (Adaptive Management Standards) should be incorporated to alternative C. In addition, the Reference to Section 2.5.5.2 in Alternative C seems irrelevant as Section 2.5.5.2 is the 5% oil and gas disturbance proposal. Moffat County recommends and requests Alternative A be selected as the Preferred Alternative regarding White Tailed Prairie Dogs.	White-tailed prairie dogs are considered a species of concern because of their important association with the endangered black-footed ferret and other species. In addition, white-tailed prairie dog towns create unique vegetative conditions that provide potential habitat for the mountain plovers, black-footed ferrets, and burrowing owls, which are all special status species. Black-footed ferrets have not been reintroduced into the Little Snake RMPPA. BLM is to consider reintroduction into the area should it be determined that white-tailed prairie dog populations within the Vermillion Creek area could support a viable ferret population. White-tailed prairie dog stipulations are based on the best available scientific information. The stipulation referenced by the commenter is not unduly restrictive, as in most instances oil and gas operators would be able to drill directionally to reach the resource below white-tailed prairie dog towns of less than 10 acres in size.
Fish and Wildlife Habitat	Moffat County Commissioners	p. 4-42. 4.3.5 Impacts on Fish and Wildlife: Moffat County recommends BLM add an impact describing that wildlife numbers must be reduced when habitat cannot sustain numbers. Although it is DOW's responsibility to reduce numbers, BLM should state they support reductions for wildlife rather than solely livestock.	BLM is working with DOW to reduce livestock/big game conflicts and this is addressed in the range of Livestock Grazing alternatives. Alternative B: “BLM would work closely with CDOW to reduce livestock/big game conflicts and would focus on decreasing big game populations.” Alternative C: “BLM would work closely with CDOW to reduce

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			livestock/big game conflicts so as to improve vegetative and forage conditions." Alternative D: "Livestock/big game conflicts would be reduced by focusing on decreasing livestock use, which would improve vegetative and forage conditions."
Fish and Wildlife Habitat	Jill Nichols	-OUTLAW HUNTING OF ANY ANIMAL BY ANY MEANS ON U.S. TAX PAYER OWNED LAND!!!!!!!!!!!!	Management of the State's non-listed wildlife populations is under the jurisdiction of the Colorado Division of Wildlife, not BLM. Hunting or harvesting of wildlife is one of the management options employed by CDOW and is strictly regulated to meet wildlife population objectives.
Fish and Wildlife Habitat	NW Colorado Oil and Gas Association	p. ES-4-Wildlife-Placing wildlife above all other uses is a concern. Co-habitation or co-existence is a better use of words. We need to work together and adaptive management could be used here as well.	See General Comment Response #32
Fish and Wildlife Habitat	Tim Pollard	A couple of issues with the plan itself: 1. The four mile radius for sage grouse habitat is quite a bit more than most experts believe the birds need to thrive. Colorado DOW has in the past talked about a two mile radius, so not sure why it has doubled in this plan. 2. Wildlife are an important national resource. However, they are not the only important resource in the Little Snake management area.	Local research has shown that over 75% of nesting females nest within a 4-mile radius of the lek. Since an objective of the Proposed RMP is to prevent disturbing 75% of nesting birds, greater sage-grouse nesting and early brood-rearing habitat within a 4-mile radius of a lek will be subject to a Controlled Surface Use stipulation from March 1 and June 30. Under FLPMA's multiple use mandate, BLM manages many different resource values and uses on public lands. Through land use planning, BLM sets goals and objectives for each of those values and uses, and prescribes actions to accomplish those objectives. The RMP EIS provides for protection of the resource but still provides the flexibility to allow multiple uses within the planning area.
Fish and Wildlife Habitat	Public Lands Advocacy	PLA objects to the imposition of controlled surface use stipulations to protect White Tailed Prairie Dog (WTPD) towns less than 10 acres in size and a timing limitation on towns greater than 10 acres. BLM has provided no scientific basis for this restriction and is apparently ignoring that the US Fish and Wildlife Service found listing of the species was unwarranted due to a lack of threats. We recommend that BLM retain current management of WTPD or provide relevant scientific data that supports this increased restriction.	In 2004, the Service determined that a petition submitted by the Center for Native Ecosystems and others did not present substantial biological information indicating that listing may be warranted. In 2007, after questions were raised regarding whether the petition decision was based on the best science, the Service announced the decision would be reconsidered. Subsequently, the Center for Native Ecosystems filed a lawsuit regarding the petition finding. In a stipulated settlement, the Service agreed

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			to submit to the Federal Register by May 1, 2008 a notice initiating a status review for the white-tailed prairie dog and submit the results of that status review to the Federal Register by June 1, 2010. These restrictions are not included under Alternatives, A, B, or D. Based on the analysis of impacts of implementing these restrictions and not implementing these restrictions, BLM believes it is necessary to restrict surface disturbing activities according to Alternative C in order to protect white-tailed prairie dog colonies.
Fish and Wildlife Habitat	Questar, Rockies Region	Page 2-16, Section 2.5.5.2: Remove any language referencing 160-acre surface spacing or averaging facilities over the landscape. Add a phrase that would allow for Operators to submit alternative year-round drilling proposals to be analyzed by the BLM and considered for approval.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. It is clearly stated that there is no surface spacing requirement to the sagebrush protection approach. In addition, the approach states that BLM would consider PODs from oil and gas operators showing a strategy to reduce habitat fragmentation.
Fish and Wildlife Habitat	Questar, Rockies Region	Page 2-21, Section 2.5.5.2: Prairie dog seasonal timing restrictions from April 1 to June 15 have not previously been implemented. Please consider avoidance of prairie dog burrows as an acceptable means of mitigation which would not trigger the seasonal timing stipulation.	Alternative D of the Draft RMP/EIS considers an ACEC for white-tailed prairie dog habitat that includes avoidance of the colonies using a no-surface-occupancy stipulation. Additionally, Alternative C avoids small colonies that could be eliminated in the face of surface disturbance.
Fish and Wildlife Habitat	Robert Steele	Alternates C and D of the Little Snake Resource area are far too restrictive to allow the full concept of multiple use to be effective for the citizens of the area and the nation. I object to: Your concessions to hunters in the wildlife protection portions of the RMP ignores the needs of other travelers and livestock interests. The current federal and state wildlife management programs have proven to be ineffective so why add more restricts.	See General Comment Response #32
Fish and Wildlife Habitat	The City Council of Steamboat Springs	Oil and Gas Development: Wildlife Protection: Alternative C provides for protection of sensitive wildlife at sensitive times through: (1) timing limitations on oil and gas activities on 1.2 million acres including: big game habitat, big game fawning and calving areas, critical sage grouse winter habitat, and nesting sage grouse;. (2) no-surface-occupancy (NSO) or controlled surface-use stipulations; and voluntary incentives for operators. Additionally, we urge further protection for priority sage grouse habitat and critical big game	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS.

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		habitat identified by Colorado Division of Wildlife and BLM by eliminating surface disturbances and increasing no surface occupancy stipulations around lek sites and other critical habitat.	
Fish and Wildlife Habitat	The Nature Conservancy in Colorado	2. Quantify desired outcomes; describe monitoring in greater detail; and identify thresholds for change as part of the RMP. We understand that BLM intends to generate more clear adaptive management guidance as part of the Assessment Guidance Document (AGD), which is slated to be completed after BLM releases the Record of Decision. However, any delay in the creation of the AGD – which in and of itself could require significant time – may allow resource degradation to continue unchecked past potentially unacceptable levels per BLM (whatever such levels may be).	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. BLM recognizes that an adaptive management approach is incomplete without measurable outcomes, indicators and trigger points. However, including these details in a land use plan where they cannot be changed without a RMP amendment is contrary to the flexibility which an adaptive management approach is designed to provide. Therefore, BLM has committed to preparing a subsequent adaptive management document entitled an Assessment Guidance Document. This document will contain all the necessary specific information required for adaptive management. BLM states in Appendix M that the Assessment Guidance Document will be developed within a 2-year period after the ROD is signed and that no adaptive management projects would be allowed before the approval of this document.
Fish and Wildlife Habitat	The Nature Conservancy in Colorado	Key Steps of the Planning Support Tool. Described below is the process that BLM and TNC have been using to inform the aforementioned RMPs, and the degree to which the Little Snake Draft RMP/EIS addresses each step of the process. BLM could complete most or all of the steps below in between the Draft and Final plans (preferable) and/or for the AGD. We hope that this feedback strengthens the adaptive management provisions of the plan. These steps should be somewhat familiar to the Little Snake Field Office, as we shared this tool in 2006 with the Field Office Manager, the Planner, and other individuals at BLM's request. 1. Identify priority communities and species across the planning area as the basis for planning and management. The first step in the process is to identify the specific resources for which adaptive management will be applied. These resources should include biological resources since BLM would typically be managing adaptively for biological resources, but they could also include cultural, socioeconomic, and other resources.	BLM recognizes that an adaptive management approach is incomplete without measurable outcomes, indicators and trigger points. However, including these details in a land use plan where they cannot be changed without a RMP amendment is contrary to the flexibility which an adaptive management approach is designed to provide. Therefore, BLM has committed to preparing a subsequent adaptive management document entitled an Assessment Guidance Document. This document will contain all the necessary specific information required for adaptive management. BLM states in Appendix M that the Assessment Guidance Document will be developed within a 2-year period after the ROD is signed and that no adaptive management projects would be allowed before the approval of this document.

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		Specifically for biological resources (on which this discussion focuses), this step should identify an adequately detailed set of communities and species to help BLM meet its management goals, such as those for standards for public land health (e.g., Standard 2 – riparian systems, Standard 3 – healthy plant and animal communities, and Standard 4 – Special Status Species). "Communities" for this step primarily include ecological systems (e.g., sagebrush shrublands), but can also include rare plant communities (e.g., Narrowleaf cottonwood/red osier dogwood). The communities and species should be relatively few in number to enable focused monitoring and desired outcome development, yet broad enough to capture the smaller or "nested" communities and species that represent the full range of priority species and communities.	
Fish and Wildlife Habitat	The Nature Conservancy in Colorado	5. Formulate a monitoring and adaptive management plan. This step involves three activities: a. Identify indicators that are monitoring priorities. The health indicators serve as the suite of possible monitoring priorities. Rarely will an agency have time or need to monitor all potential indicators, so it is useful to prioritize the indicators based on factors such as the indicator's sensitivity to change and BLM's ability to affect an indicator. Example: The indicator "proper functioning condition" would probably be a very high monitoring priority because BLM actions affect PFC and BLM policy requires that the agency monitor it. b. Identify thresholds for adaptive management. Here is the crux of the whole adaptive management effort – how will BLM decide when management change is necessary? The definitions of indicator ratings (Step 2c) can provide a useful basis for identifying thresholds for adaptive management. Example: BLM could identify a move of "good" to "fair" for sage-grouse population size as the threshold for management change. Once an indicator crosses this threshold, already identified management changes are undertaken. c. Identify additional components of a monitoring framework. A monitoring framework can also include additional elements such as frequency, cost, which organization/agency will do the monitoring, etc.	BLM recognizes that an adaptive management approach is incomplete without measurable outcomes, indicators and trigger points. However, including these details in a land use plan where they cannot be changed without a RMP amendment is contrary to the flexibility which an adaptive management approach is designed to provide. Therefore, BLM has committed to preparing a subsequent adaptive management document entitled an Assessment Guidance Document. This document will contain all the necessary specific information required for adaptive management. BLM states in Appendix M that the Assessment Guidance Document will be developed within a 2-year period after the ROD is signed and that no adaptive management projects would be allowed before the approval of this document.
Fish and Wildlife Habitat	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.5.2 Management Action s- Raptors (p.2-19): Alt. C (same as Alt. A) states that "NSO would be allowed within a 0.125-mile radius of raptor nest sites." We encourage BLM to justify	The 0.125 mile NSO is a minimum distance that can be expanded when appropriate, as described in Alternative A. In addition, a six month seasonal 0.25 mile NSO is included in the alternative. The

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		this NSO based on scientific study. In the absence of such research, change this to the Alt. D action which states, “NSO/NGD would be allowed within a 0.25-mile radius of raptor nest sites.” This is a more cautionary approach.	commenter has provided no scientific information indicating that the 0.125 mile NSO is inadequate.
Fish and Wildlife Habitat	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.5.2 Management Action s- Water fowl (p.2-20): Alt. C (same as Alt. A plus additional provisions) states, “NSO would be allowed on significant production areas, such as waterfowl habitat and rookeries.” Please define “significant production areas” and include a map as an appendix if one does not already exist.	As stated, waterfowl “significant production areas” are waterfowl habitat management areas and rookeries; or habitats rich in food and shelter for adult and young waterfowl. These areas have not been mapped, but would be identified on a project-level basis when implementation-level proposals are submitted.
Fish and Wildlife Habitat	U.S. Fish and Wildlife Service	Conservation measures should also be included for protection of prairie dog habitat in areas that are suitable for ferret reintroductions. Plague in recent years has reduced the overall number of prairie dogs. However; we believe this is a temporary condition and that the numbers of prairie dogs should return to their historic numbers over time provided their habitat is not substantially altered or destroyed.	Alternative C contains several restrictions to protect white-tailed prairie dog habitat. To ensure the prairie dog complex remains suitable for reintroduction of the black-footed ferret, language similar to that in the 1991 Oil and Gas Leasing Amendment was brought into Alternative C: “Surface disturbing activities would be minimized to the extent reasonable to reduce landscape disturbance to prairie dog habitat for the black-footed ferret.” In addition, a new stipulation specific to white-tailed prairie dog habitat was added to Alternative C: “Controlled surface use and timing stipulations would be as follows: Surface disturbing activities occurring over more than 1 acre would not be permitted in active prairie dog towns less than 10 acres in size. These activities would be relocated to the edge of the active prairie dog town. To protect prairie dog pups, surface disturbing activities occurring over less than 1 acre or within active prairie dog towns larger than 10 acres would not be permitted between April 1 and June 15. However, if a company has a well pad in place but for whatever reason is unable to complete the well before April 1, these timing restrictions would be granted an exception. Exceptions may also be considered on a case by case basis following Appendix E guidelines.”
Fish and Wildlife Habitat	Vermillion Ranch Limited Partnership	Pg ES-4 Wildlife should not be preferential to grazing and other valid uses refer planning criteria Local community niche for public lands.	See General Comment Response #32
Fish and Wildlife Habitat	Vermillion Ranch Limited	Pg 2-16 2.5.5.2 Support but Expand cooperators fragmentation proposal to all of the resource area not yet cover to limit	BLM has updated the management of sagebrush habitat in Alternative C in chapter of the Proposed

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	Partnership	fragmentation accordingly for both limitations and benefits.	RMP/Final EIS. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority sagebrush habitats. The highest priority habitats consist of sage-grouse core areas, which include 4-mile lek radii around the largest leks, portions of sage-grouse winter range, and portions of big game winter range. Medium priority habitats are defined as consisting of big game winter concentration areas, severe winter range, migration corridors, sage-grouse winter range, sage-grouse breeding habitat, and areas within the 4-mile radius of leks located outside of the sage-grouse core areas. While high and medium priority sagebrush habitats do have timing limitation stipulations associated with them, low priority habitats do not. Therefore, without the ability to grant exceptions to timing limitations in these low priority areas, there would be no incentive for oil and gas operators to opt into the voluntary approach. It did not make sense to include areas in the voluntary sagebrush protection approach that do not have wildlife timing stipulations.
Fish and Wildlife Habitat	Vermillion Ranch Limited Partnership	Pg 3-41-52 Comments on Land Health Assessment regarding aquatic habitat: Were these conducted with a full interdisciplinary team and were the permittees involved? Request removal as they do not belong in and RMP.	The Land Health Assessments were completed using the process identified on page 3-2 of the Draft RMP/EIS. The first step of this process is to initial scoping, invite involvement, and assemble an ID team which may include BLM, local parties, and permittees. The results of these evaluations provide a landscape-level look at whether or not the individual landscapes meet the Standards for Public Land Health. As such, these evaluations provide excellent information to be used in establishing the existing condition of the range resource, considering the status of current land management practices, and analyzing the effects of the proposed alternatives.
Fish and Wildlife Habitat	Vermillion Ranch Limited Partnership	Pg 3-54 Question conclusions of LHA, prove that livestock not wildlife is culprit or remove the speculation! Please remove statement.	BLM feels there is sufficient evidence to warrant the statements regarding livestock grazing contributing to the three landscapes failing to meet LHAs. During the Landscape Health Assessment process, a group of interdisciplinary specialists make a determination of what they believe to be the cause of the problem. BLM invites grazing permittees to participate in the

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			analysis of the sites and offer their input in determining the cause of the problem.
Fish and Wildlife Habitat	Vermillion Ranch Limited Partnership	Pg 4-64 5th paragraph does not analyze the corresponding affect on Livestock grazing by wildlife analysis is on sided. Request correction or removal.	The section on page 4-64 is the impact analysis on wildlife from other resources and could appear one-sided if Section 4.4.2 Impacts on Livestock Grazing was not also reviewed. Section 4.4.2 covers impacts on livestock grazing from other resources, including fish and wildlife management.
Fish and Wildlife Habitat	Western Watersheds Project	Predators should be protected so that their ecological role can be provided to the Little Snake Resource Area. Studies in Yellowstone and Zion National Park have shown that predators (wolves and cougars) cause ungulates to move around and have resulted in the restoration of plant communities such as cottonwood and aspen. They have also resulted in the restoration riparian areas (Beshta, 2003; Ripple and Beschta, 2006; Hebblewhite et al, 2005; Ripple and Larsen, In press).	BLM is responsible for managing habitat for fish and wildlife; Colorado Division of Wildlife is the agency responsible for the management of wildlife in Colorado.
Fish and Wildlife Habitat	Western Watersheds Project	Fleischner (1994) has well documented the loss of biodiversity and lowering of population densities of animal populations caused by competition with livestock for food and cover. It is only common sense that what livestock consume is not available to support wildlife populations. I will not go into detail on this subject other than to touch on the myth that livestock do not compete with deer because deer are “browsers”, living on shrubs and livestock are “grazers”, living on grasses and forbs. If deer are browsers, why do we see them in meadows so much of the time during spring, summer and fall?	The Draft RMP/EIS does not identify a landscape-wide lack of food for big game or livestock within the Field Office and the commenter does not provide supporting evidence of any such existing impact. The Draft RMP/EIS impact analysis already notes competition for habitat resources as an impact between livestock grazing and wildlife. It simply notes that the impacts of competition with wildlife would be greater with species that prefer grasses. It does not eliminate the impact of competition with species that prefer to browse, just that they would be more pronounced with species that prefer to graze.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	Decisions about protecting habitat and wildlife are not made at the landscape scale in the Draft RMP. The major consideration in the Preferred Alternative for wildlife protection – the option for lease holders to keep their direct disturbance down to 5% in exchange for waving seasonal use restrictions – is applied optionally on a lease-by-lease basis rather than required for the broader habitat areas that need protection. Individual gas fields or other local projects are also too small an area to make informed decisions about wildlife because they fail to see the significance of a resource in the context of the broader landscape. Management decisions about oil and gas development as it affects wildlife (and other natural resources) must be made at the landscape level looking across the entire Little Snake Resource Area and considering implications on adjacent	The decisions in the Draft RMP/EIS were made at the landscape level by applying stipulations to all of given habitat types or areas with specific habitat values. The decisions placing ceilings on surface disturbance were revised in the Proposed RMP/Final EIS after review of public comments and extensive coordination with CDOW specialists. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary,

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		lands as well.	incentive based) leases. It is also important to note that the ceiling on disturbance is not the only stipulation associated with development in these areas. The stipulation also states that BLM would require PODs from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Map 2-3 illustrates the extent of this habitat protection approach, which covers the majority of the planning area. By setting stipulations on the entire extent of a habitat or type of habitat value, across the landscape, the Draft RMP/EIS did make habitat protecting decisions at the landscape scale. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	First, ecological values should be mapped out across the full resource area such as the wildlife habitats in Map 5 (all Maps attached). Note that most of the lands outside of the National Monument and Forest Service's lands contain important wildlife values. Many areas contain multiple, overlapping habitat types. Maps of this type should be prepared and used to identify specific areas to be protected for their wildlife values and corridors connecting these patches with each other and with migratory corridors where needed (e.g. for ungulates migrating to summer range).	The Draft RMP/EIS already includes maps showing wildlife habitat across the resource area (see Draft RMP/EIS maps 3-10 through 3-20). As indicated on these maps, there are wildlife values throughout the RMPPA. Other ecological values were also used in the Draft RMP/EIS and are displayed in the other chapter 3 maps (3-4 through 3-9 and 3-21 through 3-27). Based on a simple comparison from all these maps it is evident that several areas do have overlapping values. However, showing all the information from these maps on one map would make readability difficult. However, all the data used to create these maps were used in developing the range of alternatives and performing the impact analysis.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	The plan should set up long-term (beyond the 15-20 year life of this plan) wildlife management zones based on habitat needs for the species included in these comments. The management prescriptions in these zones may vary by leasing status and split estate status. All wildlife zones should have management prescriptions based on wildlife needs and in the long-term move toward a more protective status. Examples for the wildlife management zones should include areas of no development and areas of restricted development. Management prescriptions should be similar to the following for all lands with federal minerals whether or not the BLM has surface management authority: federal minerals not leased	The Final RMP will not have a specific ending point (e.g., “15-20 year life of this plan” as noted by the commenter), but can be subject to maintenance actions or amendment, as needed and explained in the BLM 1601 planning handbook. For estimation and analysis purposes, 20 years has been used for a variety of issues to limit the scope of the analysis to a point where such estimation will produce reasonable conclusions. Concerning the creation of wildlife management zones, the decisions in this RMP are made based on existing information and to best meet BLM’s multiple use mission identified in FLPMA.

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		• no new leases in some areas in most critical habitats • where leasing is allowed, new leases must have minimum habitat core area and maximum area of direct disturbance based on wildlife research and follow phased and cluster development federal minerals leased, not held by production • when leases expire don't re-lease lands in most critical habitats • insure full and timely restoration of developed lands before any new leasing occurs • where leasing is allowed, new leases must have minimum habitat core area and maximum area of direct disturbance based on wildlife research and follow phased and cluster development federal minerals leased, and held by production • current oil and gas production continues • after production is complete, do not re-lease lands • insure full and timely restoration of developed lands before any new leasing occurs Clearly defined wildlife management zones with prescriptions such as those listed above could set a trajectory for management of the lands for the next century, not just the next 20 years. This plan needs to look at how it will set the stage for sustaining the landscape and its resources beyond current leasing – beyond the life of this RMP. Recommendations: The BLM should compile wildlife habitat data and related ecological value data and design wildlife management zones. The agency should further produce mandatory management prescriptions for these zones including areas of no oil and gas development and areas of highly restricted development based on wildlife impacts research similar to those outlined above. These new management prescriptions should set the landscape on a trajectory to protect the most important wildlife habitat areas. In the short-term, unleased lands will be protected in these areas and in the long-term (as leases expire and production is completed) these areas will be restored, unfragmented and connected across the broader landscape.	FLPMA requires that public land management be developed "on the basis of multiple use and sustained yield," not in a manner that "in the long-term move[s] toward a more protective status," as recommended by the commenter. In meeting FLPMA's direction, the Draft RMP/EIS considers a range of alternatives that require varying levels of restrictions on mineral development within wildlife habitat. In addition to applying mineral stipulations directly to wildlife habitats, the sagebrush management actions contained in the Proposed RMP/Final EIS would limit mineral disturbance in high priority sagebrush habitats to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary, incentive based) leases. The stipulation also states that BLM would require PODs from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation. Finally, the Final RMP cannot create a separate plan-within-a-plan just for wildlife habitat, with decisions that over-ride future RMP decisions. Such an action fails to consider the changing dynamics of both natural systems, as well as uses of the RMPPA's resources.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	The Draft RMP does not present sufficient data to show that the 5% surface disturbance limitation will provide adequate protection for big game. Bill Alldredge notes that the baseline conditions for big game have not been established and instead the Preferred Alternative, "fails to include some of the most recent and important data." Further, Dr. Alldredge points out that not all habitat is "equal," so, it	The commenter did not provide any more accurate baseline data to be used in the Proposed RMP/Final EIS. BLM has used the best available data for developing management actions and determining impacts.

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		is vital that the BLM identify highest quality habitat and limit effective habitat loss. His comments highlight the inadequacies in the reclamation standards set out in Appendix O, because they could result in an area being deemed "reclaimed" and more disturbance authorized where only herbaceous material is growing (which will not meet winter habitat needs for big game) or where the soil is simply stabilized. Dr. Alldredge also notes the challenges in monitoring surface disturbance.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 based on CDOW and USFWS recommendations and revised surface reclamation performance standards of the Proposed RMP/Final EIS. Changes included identifying high and medium priority habitat, or the "highest quality habitat" as mentioned by the commenter. Draft RMP/EIS Appendix O details the surface reclamation performance standard that must be met before acreage would be released from counting against the 1%. Based on public comments, more detail has been added to Appendix O.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	The Draft RMP fails to acknowledge and utilize the full extent of scientific literature pointing to the direct, indirect and cumulative impacts of roads and oil and gas development, particularly habitat fragmentation on wildlife, and incorporate it in relevant sections of the document: We commend the BLM for several sections acknowledging the likelihood of impacts on wildlife from oil and gas development. Chapter 4 on Environmental Consequences includes a discussion of direct and indirect impact of oil and gas development on wildlife (Draft RMP, pp. 4-43 through 4-47). This type of review of the scientific literature is critically important, but we are concerned that the review in the Draft RMP is incomplete and misses important literature and consequently significant findings of biologists that study wildlife impacts from roads and oil and gas development. This is of great concern since the potential for impacts is high and that the Draft RMP states that "Issues regarding where and how mineral resources could be developed will be a principle focus of this plan." (Draft RMP, p. 1-6) Substantially more information on the impact of roads and oil and gas related infrastructure on wildlife are available. These impacts widely recognized in the scientific community as having a range of direct, indirect and cumulative effects on habitats and wildlife (Trombulak and Frissell 2000, Wyoming Game and Fish Department 2004, Wisdom 2004). Effects range from direct removal of habitat to long-term displacement of species from preferred habitat. The indirect and cumulative effects are hardest to measure, but are increasingly studied through analysis of habitat fragmentation. Habitat fragmentation has been defined as the "creation of a complex mosaic of spatial and successional habitats from formerly contiguous habitat" (Lehmkuhl and Ruggiero 1991). Habitat fragmentation alters the distribution of wildlife species across the	The Draft RMP/EIS includes several references from scientific literature supporting the conclusions in the impact analysis. Most of the points the commenter raises are addressed in chapter 4 of the Draft RMP/EIS. Those few impacts that are not addressed are not able to be addressed due to the landscape-level nature of the decisions being made and the knowledge of what projects could be implemented and where. The Draft RMP/EIS includes analyses of impacts from roads on a variety of wildlife. Simply requesting that more references be added that support analyses and conclusions already contained in the Draft RMP/EIS is contrary to CEQ regulations noting that environmental impact statements should be "analytic rather than encyclopedic" (40 CFR 1500.4(b)).

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		landscape and affects many life functions such as feeding, courtship, breeding, and migration. Transportation networks are one of the most significant causes of habitat fragmentation, and negatively impact wildlife well beyond the surface area disturbed by an actual road or motorized trail. In fact, habitat fragmentation from roads and other human infrastructure has been identified as one of the greatest threats to biological diversity worldwide (Wilcove 1987). The adverse effects of routes on wildlife have been well documented in several extensive literature reviews (Trombulak and Frissell 2000, Gucinski et al. 2001, Gaines et al. 2003, Wyoming Game and Fish Department 2004, New Mexico Department of Game and Fish 2005 (attached), Confluence Consulting 2005). The hundreds of scientific papers in these literature reviews illustrate the preponderance of evidence that routes ranging from narrow dirt tracks to paved roads can and do cause adverse affects on wildlife. This volume of science simply cannot be ignored in a major land management planning effort such as this RMP (or any travel management planning effort).	
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	As documented by the comprehensive literature reviews cited above and the additional conclusions reached by state agencies in their respective reports, the existence of motorized routes can result in habitat fragmentation and, depending on the use of the route, have impacts extending well into surrounding habitats. Such fragmentation from transportation networks is immediate and can lead to a range of risks to the survival of wildlife. Sound science must be used to evaluate impacts from motorized travel routes and including those from energy development before adopting an oil and gas development plan.	The Draft RMP/EIS includes analyses on the impacts from roads on wildlife, including the potential for habitat fragmentation. Several references from scientific literature are included to support the conclusions in the impact analysis. Most of the points the commenter raises are already addressed in chapter 4 of the Draft RMP/EIS. Those few impacts that are not addressed are not able to be addressed due to the landscape-level nature of the decisions being made and the knowledge of what projects could be implemented and where. It is important to note that the Draft RMP/EIS does not consider the designation or construction of any roads or trails. After the ROD is completed, a comprehensive trails and travel management plan will be completed to designate the actual routes. Likewise, during implementation planning for oil and gas developments the need for, placement considerations and construction of routes will be addressed in site-specific NEPA. At the RMP level, it is assumed that roads and trails will be designated and that roads will likely be needed to support oil and gas development. The analysis in chapter 4 of the Draft RMP/EIS addresses the potential impacts from such. Further detailed analyses would be addressed

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			during implementation planning.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	Examples of species specific information on fragmentation and impacts from roads and oil and gas development from field biologists and the scientific literature that should be considered include the following: Sagebrush Obligate Birds Impacts: Inglefinger (2001) found that for lands within 328 feet (100 meters) of a road or well pad the density of sagebrush obligate birds drops by 50 percent regardless of the amount of activity on the road (Inglefinger 2001).	The conclusions raised by the study the commenter quotes are included in the analyses contained in chapter 4 of the Draft RMP/EIS. The effect identified by the study is addressed in the analyses, namely that increasing habitat fragmentation from roads leads to decreases increased displacement and increased stress during critical time periods. Specifically repeating the numbers cited by the commenter does not provide any further evidence beyond the conclusions drawn and presented in chapter 4 of the Draft RMP/EIS. The section detailing impacts to greater sage-grouse in chapter 4 of the Proposed RMP/Final EIS was updated, including referencing additional studies.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	Examples of species specific information on fragmentation and impacts from roads and oil and gas development from field biologists and the scientific literature that should be considered include the following: Mule Deer Impacts: Freddy et al. (1986) (attached) found that mule deer are shown to alert exhibiting a stress response to human activity at a distance of 0.29 miles (470 meters) and are less likely to use the habitat for normal life functions. Wyoming Game and Fish Department (2004) used this figure to calculate a 117 acre area of reduced habitat effectiveness around each well pad. An ongoing study by Sawyer et al. (2005) of GPS-collared mule deer in Wyoming found that deer utilized habitat progressively farther from roads and well pads over years of increasing gas development and showed no evidence of acclimating to energy-related infrastructure and activities. Lutz et al. (2003) (attached) states that mule deer can be pressured into using less-preferred or lower-quality habitat, and that this could negatively affect an individual's energy balance "and ultimately decrease population productivity especially on winter range."	The Draft RMP/EIS includes analyses on the impacts from roads and oil and gas development on mule deer, including the potential for habitat fragmentation, displacement, and reduced animal fitness and reproductive potential. It is important to note that the Draft RMP/EIS does not consider the designation or construction of any roads or trails. After the ROD is completed, a comprehensive trails and travel management plan will be completed to designate the actual routes. Likewise, during implementation planning for oil and gas developments the need for, placement considerations and construction of routes will be addressed in site-specific NEPA. At the RMP level, it is assumed that roads and trails will be designated and that roads will likely be needed to support oil and gas development. The analysis in chapter 4 of the Draft RMP/EIS addresses the potential impacts from such actions. Further detailed analyses would be addressed during implementation planning, addressing site-specific impacts from road designation, construction, and/or use.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	Examples of species specific information on fragmentation and impacts from roads and oil and gas development from field biologists and the scientific literature that should be considered include the following: Pronghorn Impacts:	After the commenter's quoted portion of the Draft RMP/EIS, the text goes on to state that "…it has been documented that woven wire…fences along roads impede or block pronghorn movement, resulting in fragmentation or elimination of access to

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		The discussion in the Draft RMP of pronghorn disturbance from roads and development was concerning, particularly the statement that "There are no known published studies on pronghorns' reactions to roads…" (Draft RMP, p. 4-45). We agree that fewer biological studies are available for pronghorn than some other species mentioned in the Draft RMP, but information is available. Pronghorn are a species that must be able to move freely across an open landscape for food, habitat, and mates. Past management planning by the BLM suggests that route densities exceeding 1mi/mi2 will cause negative impacts on pronghorn populations (BLM 1999). Wyoming Game and Fish Department (2004) note that pronghorn are particularly flight sensitive and avoid areas of dense energy development. The agency includes the following in their guidelines for oil and gas development: "Avoidance distances reported for pronghorn range from 0.25 mi (Autenrieth 1983) to 0.6 mi (Easterly et al. 1991) from sources of disturbance. Accordingly, we presume disturbance thresholds for pronghorn are comparable to those identified for mule deer. Habitat treatments should be designed to offset the reduction of habitat effectiveness throughout the areas covered by these zones of impact." (Wyoming Game and Fish Department 2004) A study in central Arizona showed that pronghorn generally exhibited a weak avoidance of areas within 3,168 feet of a maintained road, as well as areas near non-maintained dirt roads and four-wheel-drive trails (Ockenfels et al. 1994, attached). The same study observed that males (and perhaps females) avoided habitat within 0.25 miles of highways. Additionally, pronghorn may be more strongly affected by the noise and activity associated with a road than by the road bed itself (Ockenfels et al. 1994), suggesting that temporal occupancy restrictions are particularly important. A study of pronghorn from the University of Wyoming for the Wyoming Department of Transportation Research Center demonstrated that pronghorn tend to occupy areas with lower densities of primary roads and other rights of way (Sheldon et al. 2006, attached). This study also supports discussion that pronghorn strongly avoid fencing and fencing along paved roads. Van Riper and Ockenfels (1998) (attached) found that in more than 3,000 movements that were recorded, not one pronghorn ever crossed a fenced road. Perhaps the most significant research on pronghorn and oil and gas development is an ongoing study by Berger et al. (2006) (newspaper articles attached) in Upper Green River Basin gas fields. The	severe winter relief range" (Draft RMP/EIS page 4-45). The analyses also conclude that pronghorn avoid drilling sites, but not because of changes in vegetation, leading to the assumption that it is due to the presence of the activity. However, the Draft RMP/EIS also includes references to research that found that pronghorn do continue to use areas that contain oil and gas fields, although to a diminished degree. With these analyses, the conclusions already addressed in the Draft RMP/EIS are the same to those raised in the references noted by the commenter. Therefore, the commenter's references support the analytic conclusions already in the Draft RMP/EIS.

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		research suggests that the configuration and density of well pads and other surface disturbances adversely affect pronghorn habitat use. This paper documents findings from the first year of a 5 year study monitoring study funded by oil and gas companies and done in coordination with wildlife managers at the BLM and Wyoming Fish and Game Department. A subset of the results from the report includes: i. “A growing array of gas fields, roads and attendant human infrastructure is altering the suitability of habitat for wildlife.” ii. “continual fracturing of previously undisturbed lands is leading to reduced usage and abandonment of habitat parcels, particularly those less than ~ 600 acres in size.” iii. “Snow depth in excess of ~ 20 centimeters affects use of local habitats. However, once the density of gas wells and attendant infrastructure reaches a threshold, pronghorn no longer us these areas irrespective of snow depth.” iv. “Based on 56,992 data points generated from global positioning system (GPS) radio collars, none of the collared animals used areas within the Jonah Gas Field.” v. “Pronghorn generally shunned concentrated gas fields, and there was no evidence to suggest animals altered their 24-hour activity patterns to utilize these areas at night when human disturbance was reduced.” An updated report including the second year’s field work is due out this spring and should be considered developing the final alternative for the Little Snake RMP.	
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	Examples of species specific information on fragmentation and impacts from roads and oil and gas development from field biologists and the scientific literature that should be considered include the following: Elk Impacts: A major volume reviewing elk ecology and management by Lyon and Christensen (2002) (attached) states, “Access — mainly that facilitated by roads — is perhaps the single most significant modifier of elk habitat and a factor that will remain central to elk management on public and private lands.” Several authors have noted that elk habitat security is a particular concern in open landscapes (Morgantini and Hudson 1979, Rost and Bailey 1979 (attached), Lyon 1979 (attached)) such as the open sagebrush habitat of the Little Snake Resource Area. Lyon (1979) suggests that in non-forested landscapes with route densities less than 1 mi/mi2 may eliminate effective habitat for elk. A study in open habitat at Jack	The Draft RMP/EIS includes analyses on the impacts from roads and oil and gas development on elk. The commenter is referred to pages 4-44 and 4-45 of the Draft RMP/EIS for these impacts. With this analysis, the conclusions already addressed in the Draft RMP/EIS is the same as that raised in the references noted by the commenter. Therefore, the commenter’s references support the analytic conclusions already in the Draft RMP/EIS. The management alternatives were developed to address the wide range of issues raised during the scoping period. This included wildlife management and protection, including the various interactions between wildlife, elk in this case, and their habitat. CEQ’s NEPA regulations support structuring an EIS

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		Morrow Hills in Wyoming observed that elk avoid areas within 1.2 miles of roads and active oil and gas wells in the summer and within 0.6 miles of these features in the winter (Powell 2003) (attached). While it is important to acknowledge the latest science on wildlife impacts, this information is of limited value as a simple discussion in the Environmental Consequences chapter. Its real value is in building a knowledge base to draw on for the process of crafting management alternatives. It is not clear from the Draft RMP if this was used to shape and evaluate alternatives for the protection of wildlife resources.	such that chapter 2 presents the alternatives, chapter 3 presents the affected environment (habitat conditions, population levels and trends, etc.), and chapter 4 presents the environmental consequences. The Draft RMP/EIS follows this direction.
Fish and Wildlife Habitat	Wilderness Society (The), et. al.	5. Raptors. The preferred alternative proposes to apply NSO stipulations only within a one-quarter mile of raptor nest sites "to preserve the integrity of the sites" (p. ES-9). However, the U.S. Fish and Wildlife Service has developed guidelines for raptor management that require larger buffers from disturbance than this. Recommendations: The BLM must consult with the U.S. Fish and Wildlife Service to ensure that its raptor management is in compliance with the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, and the Endangered Species Act. The Utah Field Office of the Fish and Wildlife Service is able to provide the BLM with these raptor guidelines, and the BLM should adopt their recommended management. At present, the RMP's proposed management is inadequate.	BLM has worked closely with the appropriate office of the U.S. Fish and Wildlife Service in developing the Draft RMP/EIS and its chapter 2 management actions. Consultation efforts have been initiated and will be completed per legal and regulatory requirements and direction. Further, BLM is not required to use guidelines prepared by another ecological field office of the U.S. Fish and Wildlife Service than is formally responsible to provide biological advice and assist in legal consultation efforts the Little Snake Field Office.
Fish and Wildlife Habitat	Lynda Winslow	- Limit oil and gas impacts on sage grouse and critical big game habitat by capping surface disturbance at one well per 640 acres, and requiring best management practices including directional drilling.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 to include disturbance thresholds of 1% in high priority and 5% in medium priority habitats, which results in an average of no more than one facility for each 640 and 160 acres, respectively. The Draft RMP/EIS already includes application of best management practices. BLM is committed to protect greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain and restore sage-grouse populations and their habitats.
Fish and Wildlife Habitat	Yates Petroleum Corporation	Page 2-126 Baseline Measurements and Monitoring I missed the 5% threshold. What does that mean and where is it defined?	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the

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	(through agent)		Proposed RMP/Final EIS.
Fish and Wildlife Habitat	Yates Petroleum Corporation (through agent)	Page 2-130 The white-tailed prairie dog was not warranted for listing and is not endangered. These restrictions are very unusual and not warranted	In 2004, the US Fish and Wildlife Service determined that a petition submitted by the Center for Native Ecosystems and others did not present substantial biological information indicating that listing may be warranted. In 2007, after questions were raised regarding whether the petition decision was based on the best science, the Service announced the decision would be reconsidered. Subsequently, the Center for Native Ecosystems filed a lawsuit regarding the petition finding. In a stipulated settlement, the Service agreed to submit to the Federal Register by May 1, 2008 a notice initiating a status review for the white-tailed prairie dog and submit the results of that status review to the Federal Register by June 1, 2010. White-tailed prairie dogs are considered a species of concern because of their important association with the endangered black-footed ferret and other species. In addition, white-tailed prairie dog towns create unique vegetative conditions that provide potential habitat for the mountain plovers, black-footed ferrets, and burrowing owls, which are all special status species. Black-footed ferrets have not been reintroduced into the Little Snake RMPPA. BLM is to consider reintroduction into the area should it be determined that white-tailed prairie dog populations within the black-footed ferret reintroduction area could support a viable ferret population. White-tailed prairie dog stipulations are based on the best available scientific information. The stipulation referenced by the commenter is not unduly restrictive, as in most instances oil and gas operators would be able to drill directionally to reach the resource below white-tailed prairie dog towns of less than 10 acres in size.
Forestry	Moffat County Commissioners	p. 2-12 Forestry Goal …that Managing for Old Growth forests will not complement existing grazing uses. Please remove the 2nd bullet referring to managing based on a single book/manual.	The Proposed RMP/Final EIS has been revised to remove this objective to reduce duplication. Managing areas identified as old growth would naturally be accomplished by reaching the next objective to "maintain the appropriate...age-class distribution for forest and woodland communities that are resilient to disturbances." However, managing an

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			area to maintain old growth characteristics would not automatically result in a loss or reduction of properly managed livestock grazing.
Forestry	The Nature Conservancy in Colorado	As another suggestion, we would encourage BLM to provide context for quantified desired outcomes and management actions. Using the lodgepole treatment action above, explain how you chose 50 acres to treat, versus another amount (e.g., 5, 500, 600, or 5,000 acres). The public needs some sense of the full range of treatment options, the total amount needing treatment, and how the selected acreage goal fits into this range. Completing Step 2c above - Identify and define a series of ratings for each indicator could address this issue.	The context for a given decision should not be located directly next to it in chapter 2, but, as established by NEPA CEQ regulations, throughout the NEPA document in chapter 1 as an issue (as well as the more voluminous scoping comments) and in chapter 3 as the existing condition of the environment. Combined, these set the stage for the alternatives presented in chapter 2 and the analysis in chapter 4. The Draft RMP/EIS chapter 3 presents the acres of coniferous forests on BLM surface estate within the RMPPA (less than 2% of the total acreage), as well as a description of the existing condition of the various coniferous forest types. In addition to this information, the alternatives, and the targets referred to by the commenter, were developed by an interdisciplinary team, including fire ecologists, and are based on both ecological need and realistic staffing and funding. The team broke down the planning area into different vegetation types, and gauged the need for treatment of each type. Past funding trends were employed to create realistic and obtainable targets given the ecological needs. The alternatives also used the goals and objectives, the existing decisions from the 1989 RMP and amendments, and previously management activities. The forestry management actions presented in Sections 2.5.4.2 are a result of this process.
Forestry	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.4.2 Management Actions – Forestry (p.2-14): Alt. C states includes at least two statements about restoration: “An average of 200 acres per year of Ponderosa pine…would be restored” and “An average of 500 acres per year of pinyon-juniper woodland would be restored.” Consider replacing the “restored” with “treated” in both instances. It is highly unlikely that full restoration of any acres can be achieved in any given year, though acres can certainly be treated with an aim of restoration.	The Proposed RMP/Final EIS was revised as recommended in the comment.
General/	A. Alldredge	Adaptive Management - Utilization of adaptive management is good and Appendix M provides a generic description of the process. The	Appendix M describes the adaptive management framework that would be employed when

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Miscellaneous		failure here is that there is no indication as to how this adaptive management will actually be applied. Triggers and actions that would be implemented are not discussed and it is not clear who will make decisions regarding changes in management directions. Monitoring, as proposed in the document (Appendix F), will not provide the necessary information in a timely fashion to render adaptive management feasible. One of the better triggers for big game animals that could be precisely measured for a reasonable cost would be over-winter survival of juvenile animals. The BLM must elucidate triggers and actions for adaptive management, indicate what data will be collected to drive the adaptive management process and discuss responses to be implemented.	implementing the Proposed RMP. It was not intended to contain resource-specific targets, trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets or triggers should be adapted, this would not be possible without a land use plan amendment. Appendix M also states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. The specific course of action to be taken will be determined by the authorized officer, in consultation with Field Office staff, at the time a trigger point is reached.
General/ Miscellaneous	Colorado Division of Wildlife	An expanded list of recommended BMPs accompanies this letter (Attachment B CDOW 2007b). Use of applicable BMPs should be mandatory throughout the resource area. The BMPs listed within the sage grouse section of the alternatives (pp 2-132 to 2-135) were taken largely from the Northwest Colorado Greater Sage-Grouse Conservation Plan (Northwest Colorado Greater Sage-Grouse Working Group 2006). Over the past year, CDOW has put considerable effort into devising a more comprehensive list of BMPs that have the potential to reduce impacts of energy development on wildlife, including big game and other species other than sage grouse. CDOW recommends that this expanded list be incorporated in the RMP. Industry should be expected to do the best job feasible to protect wildlife wherever they are operating, not just in sage grouse habitat or when operating under the sagebrush habitat functionality proposal. Implementation of appropriate, feasible BMPs should be required for all development activities on BLM lands in the LSFO.	See General Comment Response #40
General/ Miscellaneous	Colorado Division of Wildlife	Best Management Practices (BMPs) The following information is presented in the context that greater that 94% of the natural gas resources in the Piceance basin have already been leased. Many of the management options presented below could not be implemented as lease stipulations on existing leases without in many cases, being considered a violation of lease rights granted. Thus the implementation of BMPs is a voluntary approach by the lessee to implement the level of protection	See General Comment Response #40

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		envisioned by the formal lease stipulations (Le. timing limitations to protect wildlife species during critical times). Examples include: - Temporary cessation of lease operations; - Clustered development (groups surface locations of gas wells in a defined and concentrated geographic area). - Phased development (groups the drilling and construction of a number wells in time). - Consolidation of natural gas production facilities such as condensate and produced water facilities, compressors, three phased pipelines, roads, etc; - Implementing remote telemetry monitoring of producing wells; - Administrative closure of roads; - Developing daily operating plans that minimize human disturbance to the defined area; - Establishing enhance well site and road reclamation to benefit wildlife; - Restoration and or enhancement of wildlife habitat within and or adjacent to defined geographic area; - Off-site mitigation; - Protection/conservation of wildlife habitat through land conservation and/ or mitigation banking; - Transfer/abandonment of lease right; - BMPs should be structured so that the implementation of the various commitments and obligations transfers from one operator (lease holder) to the next. - An integral component of implementing BMPs is the requirement to adopt a formally accepted evaluation and monitoring protocol. This protocol would stipulate that a standardized sampling methodology be used to assess the success of any implemented BMP. For example, regarding reclamation of disturbed land; the methodology would provide objective data on specific attributes such as presence absence of noxious weeds, presence absence of rills and gullies, percent vegetative cover, percent desirable wildlife forage, species composition, etc. - Implementation of BMPs will be expedited by BLM affirmation of the authority granted in Sec. 6 of the Standard Lease Terms and Conditions to control the rate of drilling within the defined geographic	

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		area. - There is a need to explore the option of an extension in the operators lease term in response to the lessee's voluntary cessation of gas development activities in some defined geographic areas. Attachment B: DRAFT Division of Wildlife Methods to Reduce Impacts to Wildlife Siting and Construction: - Involve CDOW personnel early in the project planning phases and use Natural Diversity Information Source wildlife GIS data prior to development. - Apply seasonal timing to avoid wildlife conflict in accordance with CDOW recommendations. - Consult with CDOW on surface occupancy within 4 miles of any greater sage grouse leks. Apply seasonal restrictions during critical seasons, protect high quality habitats, and refer to local work group plan for sage grouse for additional recommendations. - Prior to ground disturbing activities, determine locations of raptor and birds of conservation concern nests, ground nesting birds and consult with CDOW on timing and buffer zones. - Collect baseline data on water quality both pre and post development. Include in baseline data collection information on groundwater, surface water springs, and macro invertebrates. - Collect baseline aquatic species inventory data both pre and post development. Include species composition, length-frequency and individual weights; conduct two pass population estimations for each stream. - Use state of the art technology to protect existing vegetation. Use of mats if possible for drilling operations to preserve topsoil and vegetative root stock. - Wherever mats cannot be used, conserve soil horizons and segregate topsoil from subsoil. Re-vegetate topsoil piles to maintain soil microbe health and viability. - Minimize habitat fragmentation by limiting surface disturbance by reducing the number of well pads per section, reducing cut and fill sizes, consolidating facilities, and controlling traffic into newly pioneered areas. - Perform voluntary onsites on private lands to identify issues prior to ground disturbance. - Consolidate pipeline corridors and economize gas transportation.	

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		Encourage cooperative gas carrying agreements. - Properly plan and site pipeline rights-of-way such they avoid drainages and riparian areas, as well as areas containing unstable soils. - Engineer and construct roads to meet or exceed minimum standards for type of vehicle traffic expected on pads. Engineer roads such that they drain water off of the road bed as well as away from wetlands and riparian areas. - Design and install culverts to ensure adequate size for coursing water. Protect inlets and install energy dissipation structures at outlets to protect drainages from erosion and sedimentation. Consult with CDOW to evaluate habitat to determine if bridges or low water crossings that permit fish passage may be appropriate structures. - Implement directional drilling to the greatest extent possible. Cluster wells on multiple-well pads and place associated facilities to maximize use of well pads. - Consolidate oil and gas production facilities to reduce disturbance to wildlife and minimize long term impacts. Reduce the number of locations where water and oil would be hauled off by truck. - Avoid critical habitats such as migration corridors, big game fawning and calving areas, sage grouse leks, wetlands, riparian corridors, streams, (spell out habitats) and plan activities to avoid these areas. Drilling Operations and Production: - Simultaneously complete wells to facilitate faster drilling and development rates. - Provide three acres of reclamation for every one acre of surface disturbance to mitigate wildlife impacts. - Centralize hydraulic fracturing operations, and complete simultaneously with drilling when possible to speed up the drilling process. - Restrict well site visitations to between the hours of 10:00 a.m. and 3:00 p.m. Reduce well site visitations during winter months to protect wintering bighorn sheep and deer. Economize visitation to wells by use of multi-function contractors. - Reclaim well sites and other disturbed areas quickly with native weed free seed and forbs. Consult with CDOW on interim/final reclamation seed mixes. - Make every effort to aggressively control noxious and invasive	

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		weed species. Consult county and State of Colorado guidelines for weed identification and control. Map weed accumulations prior to ground disturbance to optimize weed mitigation. - Preplan and adequately size infrastructure and facilities to accommodate current and future gas production. - Recycle and reuse water. Treat produced water if possible to Federal and State water discharge specifications. Install water treatment facilities such as reverse osmosis if practicable. - Install or utilize water distribution pipelines for completions and reuse of produced water. - Educate employees and contractors on best management practices, environmental regulations, and raise awareness on wildlife issues. - Encourage industry participation in CDOW's Operation Game Thief program and immediately report all potential poaching incidents. Educate industry and their contractors on the importance of poaching and wildlife harassment mitigation. - Create development plans to phase development to maintain wildlife sanctuaries. - Install automated systems, including high tank alarms, emergency shut down and facilitate remote monitoring. - Expeditiously skim and eliminate oil from produced water ponds and reserve pits, and exclude wildlife and livestock from evaporative ponds and pits. - Protect wetlands, drainages, and riparian areas from erosion, sedimentation and spills. Map wetlands prior to development to identify and properly permit these sensitive areas. Consider wetland banking if feasible. - Facilitate increased communication and cooperation between stakeholders, companies and agencies. - Line reserve pits to protect groundwater or drill and complete using a closed loop systems where practical. Transportation: - Minimize fugitive dust generation and vegetative impacts from construction and road traffic through application of gravel to roads, watering roads with potable water, or application of magnesium chloride. Minimize fringe vegetative effects from dust. - Manage travel and prohibit off road travel. Manage development of road networks through transportation planning, and reduce habitat	

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		fragmentation. - Restrict and monitor vehicular speed to reduce wildlife collision potential, increase safety, and minimize dust generation. - Encourage carpooling, transportation coordination or provide mass transport options for workers to work sites. Consider advantages of man camps. - Limit offsite tracking of mud from roads by graveling roads. Environmental: -Institute corporate environmental, safety and health program. Consider developing environmental management system, and audit program routinely to ensure compliance. Track incidents to evaluate system failures, shortcomings and patterns. Educate employees and contractors. - Hire environmental specialists such as reclamation and weed experts, and biologists, and implement their recommendations. - Develop site-specific management plans to influence post development, which could include reclamation, control of invasives/noxious weeds, grazing, storm water, transportation management, spill control, sampling and analysis plans, wildlife habitat enhancement, etc. - Spread quick germinating native seed for interim reclamation on cut and fill slopes of well pads as well as on other disturbed areas such as right-of-ways. - Develop site specific reclamation plans and consult with CDOW on seed mixes, apply seed most effectively during the late fall and early winter. Assess reclamation success at least annually through photo documentation, vegetation plots, documentation of invasive weeds and erosion. Evaluate reclamation in different areas that represent different elevations, vegetative communities, slope aspects, water proximity. - Cooperate with CDOW on game management issues. Provide opportunities for hunter outreach, education and conservation on private lands. Consider hunting leases on private lands or land exchanges. - Irrigate landscape where practicable to accelerate reclamation and provide additional forage. Obtain water rights to irrigate additional lands and maintain or improve, if possible, historical irrigation regimes. - Consult with CDOW on wildlife habitat enhancement opportunities and create plans to implement improvements. Wildlife habitat	

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		improvements could include water, grazing management, vegetation, installations or removal of fences, vegetative treatments, interseeding, controlled burns, replanting, etc. - Compile maps containing wildlife information including mule deer, elk, sheep, sage grouse, raptor, wildlife usage etc. Survey for wildlife issues prior to development. Plan around issues accordingly. - Track wildlife habitat improvements on maps, photographs, and other documentation. - Monitor and map wildlife presence or usage areas. Document using photographs, maps and annual reports as to deer and elk usage. Identify locations of native fish (Cutthroat trout) and consider stream habitat improvements. Compile information on maps to track changes and document occurrences. - Install high tensile or post and rail (wildlife friendly) fences and or remove unnecessary fences to reduce wildlife entrapment hazards. - Install raptor perch protection on fences in sage grouse habitat. - Mitigate impacts to streams by controlling erosion and sedimentation, and managing storm water. Reclaim sites as quickly as possible to restore vegetation and control erosion. - Construct grazing management plans for private lands and assess stocking rates annually. Improve grazing efficiency through water improvements, vegetative treatments, weed control, habitat enhancements, etc. - Engage in or fund CDOW and private research to develop methods for impact reduction. - Reduce noise effects using special mufflers, equipment housing, installation of sound barriers, earthen berms, etc. - Consider leaving portions of hay meadow vegetation for wildlife winter consumption. - Apply certified weed free mulch to reclaimed areas to preserve seed and maintain soil moisture. - Preserve air quality with dust suppression, use of combustors, electric equipment, and complete wells without flaring. - Allow no pets on site and report feral animals to County Animal Control Officers. - Institute an emergency response program and educate employees and contractors on response procedures. - Fence livestock out of newly reclaimed areas until reclamation becomes established. Fence construction should follow CDOW	

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		fencing guidelines and be durable to avoid wildlife entrapment. Once fences are no longer needed removing fencing material and dispose of properly. - Consult with CDOW/BLM/USFS on wildlife habitat enhancement projects, reclamation planning, noxious weed control, riparian habitat restoration, grazing management, geographic area specific seed mixes. - Consider putting lands under conservation easement. - Maintain compliance with all state and federal environmental regulations.	
General/ Miscellaneous	Colorado Wildlife Federation	Our members also continually voice strong concern about the amount of reclamation bonds. A reclamation bond must be adequate to fully reclaim a disturbed area to established soil, grading and vegetative standards. This must be a requirement as proper reclamation is one of the essential keys to mitigating development impacts and retarding invasion of noxious weeds.	Establishing the levels or limits of reclamation bonds is not a landscape-level decision, but is determined on a case-by-case basis at the implementation phase. As such, it is beyond the scope of the RMP.
General/ Miscellaneous	Form Letter #8	BLM must monitor the effect its management decisions have upon the outdoor recreation industry (hunting, fishing, wildlife watching, etc), as hunting generates $26 million for Moffat County's economy alone.	An analysis of impacts on recreation is included in chapter 4 (Section 4.4.3) of the Draft RMP/EIS, and socioeconomic impacts from recreation across the alternatives, including changes in types of recreation, is included in Section 4.5. Subsequent activity-level, NEPA analysis will be conducted for specific proposed activities, which will include an analysis of potential impacts on recreation.
General/ Miscellaneous	Form Letter #8	One of the major themes discussed by the BLM and the cooperating agencies is adaptive management. In theory, adaptive management is extremely attractive. However, there is little information or examples available that illustrate where it has been adequately funded or effectively employed to actually improve management of the resources in which it is designed to protect. We are not explicitly against the use of adaptive management, but do caution against its usage in any large scale projects and must demand that any project go under a public review period prior to implementation. BLM must also explicitly state that they will utilize any data recovered from monitoring to implement a decision that follows the data from monitoring.	Principles of adaptive management have been used by BLM in many field offices. Appendix M describes the adaptive management framework that would be employed when implementing the Proposed RMP. Appendix M states that adaptive management decision-making should be limited to situations where all of the criteria in the "adaptive management filter" are met. Criterion 5 of the adaptive management filter states: "There are firm funding and workload priority commitments to conduct monitoring." Therefore, no adaptive management project would be approved if there were not adequate monitoring funds available. FLPMA Section 201 also requires BLM to "maintain on a continuing basis an inventory of all public lands and their resource and other values…" In accordance to this, BLM works closely with all involved parties to

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			continue the collection of inventory and monitoring data. Appropriate NEPA analysis is required for any project proposed on federal lands, which would include a public review and comment period before the project is implemented.
General/ Miscellaneous	Form Letter #8	Adaptive management projects must not waive seasonal or timing limitations for critical seasonal habitats or for habitat of species of special concern (e.g. critical winter range for mule deer and Greater Sage Grouse nesting habitat). •All adaptive management projects must be fully funded in order to ensure that monitoring will occur properly.	Applying the adaptive management process does not automatically result in the waiver of seasonal or timing limitations. Rather, the revised Appendix E in the Proposed RMP/Final EIS contains the criteria and explains the process BLM follows when considering and granting or rejecting requests for exceptions, modifications, or waivers. Specific decisions will be made in response to monitoring data on a case-by-case basis, and cannot be predicted at the RMP stage. Appendix M states that adaptive management decision-making should be limited to situations where all of the criteria in the “adaptive management filter” are met. Criterion 5 of the adaptive management filter states: “There are firm funding and workload priority commitments to conduct monitoring.” Therefore, no adaptive management project would be approved if there were not adequate monitoring funds available.
General/ Miscellaneous	Rick Hammel	There are many times the BLM has said,"...would be encouraged." This comment is relatively meaningless. The BLM must develop incentives that mean something to the permittee, i.e., Waiving of a portion of a fee.	Draft RMP/EIS chapter 2 decisions include resource allocations, specific restrictions, and/or stipulations on uses, or desired resource conditions. The use of the phrase “would be encouraged” was purposely associated with several decisions throughout chapter 2 to avoid applying overly restrictive stipulations that would not be appropriate in all instances. However, the insertion of the recommended stipulation and the “would be encouraged” language allows BLM to convey management intent to be applied at the implementation/activity level and during review of specific project proposals.
General/ Miscellaneous	Rick Hammel	3. It is our understanding that BLM does not have baseline data on a lot of management disciplines within the resource area. Land health assessments (LHA) cover some of inadequacies. But certainly not all of them. A concerted effort must be done within the first five years of this plan to acquire this data. This is particularly important if adaptive management is going to take place. Without baseline data, adaptive management will not be able to occur. For that matter,	Baseline data/information is presented in chapter 3 of the Draft RMP/EIS. BLM recognizes that comprehensive baseline data is not available for all resources. This fact and an identification of some of the major types of unavailable data is noted in Section 4.2 of the Draft RMP/EIS. BLM is collecting baseline data where possible, and NEPA requires

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		efficient management practices are far more difficult without the latest resource data.	BLM to disclose potential impacts using best available information which has been done. Appendix F includes information on future data gathering efforts to assist in the adaptive management process. Additionally, FLPMA Section 201 requires BLM to “maintain on a continuing basis an inventory of all public lands and their resource and other values…” In accordance to this, BLM works closely with all involved parties to continue the collection of inventory and monitoring data.
General/ Miscellaneous	Anita Hawkins	I also believe that education is important to help people understand the reasons for the regulations and encourage them to comply. I did not notice in the Little Snake RMP any plans for educating and informing BLM users, but I hope this will be included before and during the implementation of the plan.	Page 2-78 of the Draft RMP/EIS includes a goal to "provide visitor services including interpretive and educational information." There is also an objective to "use education as a means to further resource protection." Outlining the specifics of an education program is beyond the scope of an RMP-level decision; as such a program would need more flexibility than an RMP decision would provide. Based on the language already within the Draft RMP/EIS, BLM has sufficient management direction to develop interpretive and education plans that do assist in protection and management of resources. Future education activities will be determined on an annual basis as funding and staffing are available.
General/ Miscellaneous	Henry Keesling	Individual specific analysis of each proposed project is needed throughout the DRAFT document.	The RMP is a broad-based, land use document that makes land allocation decisions and, as such, uses qualitative and quantitative (where possible) approaches to analyze impacts resulting from the various alternatives. Specific analysis of individual proposed projects is not appropriate at the RMP planning stage, as the RMP will not directly authorize any on-the-ground activities. Site-specific analyses, mitigation measures, and monitoring plans will be developed at the activity level.
General/ Miscellaneous	Henry Keesling	p. ES-13 Cow image needs to be something that is more representative of cows in northwest Colorado. Showing cows shoulder deep in a fragile "wetland" is not good public relations. I suggest presenting an image of cows grazing in the Powder Wash or Hiawatha area.	The image used in the Draft RMP/EIS was taken from within the RMPPA and was used simply as a pictorial reminder that the RMPPA is used for livestock grazing. The image is not intended nor presented as representation of livestock grazing throughout the RMPPA.
General/	Henry Keesling	p. 2-227 Recreation Alternative C: Discussion related to adaptive	The language that links adaptive management as a

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Miscellaneous		management is incorrect. Adaptive management does not allow for this result. Application of philosophical adaptive management techniques does not change laws and policies when convenient. Adaptive management does not circumvent existing procedures. See comments below for document pages 4-175 and 4-176. Adaptive management does not write off obligations for LSFO to provide current or future management of these areas. If that is what is being proposed here LSFO needs to do a better job. If so, please explain in detail this adaptive management process and present those impacts throughout the DRAFT.	contributing component of the impacts noted on page 2-227 of the Draft RMP/EIS has been removed in the Proposed RMP/Final EIS.
General/ Miscellaneous	Henry Keesling	Section 4.4.3.3 Alternative C, second paragraph, Page 4-175-176: The indicated LSFO management actions addressing these impacts as "could" do something are lame. For LSFO the concept of "could" has resulted in LSFO doing nothing. The term "could" needs to be changed to will. Using a positive indication that something will be done provides the Public some reason to believe that LSFO will manage natural resources and mitigate impacts.	The word "could" was used several times in this paragraph. The language associated with adaptive management that used the "could" language has been removed from this section in the Proposed RMP/Final EIS. The remaining uses of the word "could" in this paragraph are appropriate to the explanation of impacts under this alternative. 1) Limiting OHV use to existing roads and trails does not automatically mean that every OHV user would blaze new routes, just that it could happen; therefore, the use is correct. 2) The statement that BLM could identify and close routes is not related to a specific management action proposed in chapter 2, and therefore the analysis is based on one of the possibilities available to BLM during the implementation phase, so the word "could" is used. This also implies to the reader that BLM may not implement such management, which makes the use of the word could accurate.
General/ Miscellaneous	Henry Keesling	p. 6-1 Chapter 6 List of Preparers: The cultural sections for this document were prepared by Booz/Allen/Hamilton, a consulting firm. Ms. Morris has been the BLM LSFO archaeologist since Fall 2006 to the present. She could not have participated in the development of the cultural sections. Please indicate this fact on the list.	While BLM's contractor assisted the BLM in preparing the Draft RMP/EIS, the BLM Field Office and State Office personnel reviewed materials prepared by the contractor throughout the preparation of the Draft RMP/EIS. During these reviews a number of BLM cultural resource specialists provided comments on the cultural resource sections. The contractor subsequently incorporated these comments, and BLM reviewed the incorporation prior to final publication. Through these measures the Draft RMP/EIS is fully considered a BLM document, although as noted in chapter 6 of the Draft RMP/EIS outside preparers

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			were used to assist in the preparation.
General/ Miscellaneous	Moffat County Commissioners	p. 2-24 General Typo Comment Each time adaptive management is referenced it refers to Appendix E. Actually, appendix M is the Adaptive Management Appendix.	The references to Appendix E on page 2-24 and throughout this chapter are correct. The statements in question generally state that "...exceptions would be granted according to [adaptive management] criteria established in Appendix E." Appendix E outlines the criteria that would be considered for granting exceptions, modifications, and waivers to allow for additional flexibility in approving surface disturbing and disruptive activities. In contrast, Appendix M explains the adaptive management approach to be employed in implementation of Alternatives B, C, and D. Therefore, the references to Appendix E in these contexts are correct.
General/ Miscellaneous	Moffat County Commissioners	p.2-58 Alternative C Typo on 'Appendix E.' change to 'Appendix M' p.2-61 Alternative C Typo on 'Appendix E.' change to 'Appendix M'	The references to Appendix E on page 2-58 (Alternative C) and page 2-61 (Alternative C) are correct. Appendix E outlines the criteria considered for granting exceptions, modifications, and waivers to allow for additional flexibility in approving surface disturbing and disruptive activities. In contract, Appendix M explains the adaptive management approach to be employed in implementation of Alternatives B, C, and D. Therefore, these references to Appendix E are correct.
General/ Miscellaneous	Moffat County Commissioners	General Comment for Chapter 3 1) Moffat County requests BLM take a serious look at rewriting this chapter to reflect positive situations. Several times the author used trip words and phrases that set off the reader. This section is terribly biased towards 'natural' landscapes with the implication that 'soil crusts' are good, 'hummocks' are bad, and 'wildlife management' is more important than other land uses. We request this chapter be written more in a neutral and positive tone rather than with negative bias toward land users.	BLM believes chapter 3 was written appropriately. Chapter 3 accurately describes the current condition of resources and resource uses within the planning area, and does not attempt to imply that one particular resource value or use is more important than another.
General/ Miscellaneous	Moffat County Commissioners	2) Moffat County requests the Land Health Assessments section state up front the qualitative nature associated with Land Health Assessments. We also request a clarification of BLM policy dictating several specialists of differing backgrounds and permittees are required to participate in land health assessments. Then, we recommend clarification as to which assessments have occurred not meeting this requirement, and which ones have occurred meeting this requirement.	On page 3-2 of the Draft RMP/EIS, it states "These landscape health assessments determine whether areas are meeting the standards. The LSFO does not intend for these studies to be used for the purpose of monitoring or inventory. The studies are only intended to be qualitative assessments and determinations of site conditions." BLM believes the last sentence clearly conveys that Land Health

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			Assessments are a qualitative assessment. On page 3-2 of the Draft RMP/EIS, the methodology for conducting Land Health Assessments is described. Part of this methodology is the creation of an Interdisciplinary (ID) Team. An ID Team is a group of individuals with training and professional backgrounds in the range of natural resources being assessed. Additionally, BLM invites grazing permittees and other interested publics to participate in the analysis of the sites and offer their input in determining the cause of the problem. Therefore, the request in the comment was integrated into all the Land Health Assessments conducted within the Little Snake Field Office.
General/ Miscellaneous	Moffat County Commissioners	p. 3-17 to 3-18 Definitions of Withdrawal but no Deferral. Moffat County finds it particularly entertaining that the "Current Conditions" section of the RMP uses the term 'Withdrawal,' but not a 'deferral,' yet BLM claims they are not 'withdrawing' oil and gas drilling in the RMP only 'deferring for the life of the RMP.' We suggest either adding a 'deferral for the life of the RMP' definition or admitting in the Alternatives section that BLM is actually 'withdrawing' mineral leases.	Pages 3-17 to 3-18 of the Draft RMP/EIS discuss some current conditions associated with water resources, and never mention withdrawals or deferrals. When the entire chapter 3 was searched for the use of both those terms, neither was used in relation to oil and gas leasing, exploration or development. Additionally, withdrawals are defined by FLPMA §103(j) as follows: the term ‘withdrawal’ means withholding an area of Federal land from settlement, sale, location, or entry, under some or all of the general land laws, for the purpose of limiting activities under those laws in order to maintain other public values in the area or reserving the area for a particular public purpose or program; or transferring jurisdiction over an area of Federal land…from one department, bureau or agency to another department, bureau or agency. 43 U.S.C. § 1702(j). The terms “settlement,” “sale,” “location,” or “entry” are all terms contemplating transfer of title to the lands in question, particularly the patenting or potential patenting, of lands out of Federal ownership into the hands of private parties based on the provisions of the General Mining Law of 1872, as amended, the various Homestead Acts, and other general land law. It is inapplicable to mineral leasing occurring under the Mineral Leasing Act of 1920. A Federal mineral lease sale is not a “sale” of public land under Section 203 of FLPMA, and a closure to

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			leasing is not a “withdrawal” as described in Section 204 of FLPMA.
General/ Miscellaneous	David & Tresa Moulton	Alternative C (the current "preferred" alternative) in the draft Resource Management Plan (RMP) for the Little Snake Resource Area (LSRA) does not provide sufficient protection for unique and irreplaceable natural and historical features of this pristine, wild area. Under Alternative C, 93 percent of the LSRA's public lands, including the Citizen-Proposed Wilderness in the Vermillion Basin, will be opened to high impact uses such as oil and gas development, road building, and off-road vehicle us. This is an extremely fragile environment in which evidence of man's activities such as vehicle tracks and drilling sites can NOT be effectively reclaimed or mitigated. Any tracks and disturbed land will remain evident for many years - beyond our lifetimes and probably our children's too. Solid protections for Greater Sage-Grouse population and habitat and for the cultural resources of the Vermillion Basin are missing from the RMP.	Alternative C in the Proposed RMP/Final EIS has been revised to include additional protections for greater sage-grouse, including requirements for oil and gas developments to maintain large, unfragmented blocks of high and medium value sagebrush habitat. In addition, BLM's policy is to fully protect cultural resources. Protection is accomplished largely through avoiding disturbing sites, which is BLM's preferred method of mitigation. The result is less than 9% of the RMPPA being open to oil and gas leasing with the standard lease terms and conditions and more than 19% either closed to leasing or containing NSO requirements. In addition, Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Closing Vermillion Basin to new oil and gas leases for the life of the RMP was considered in Alternative D of the Draft RMP/EIS. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance.
General/ Miscellaneous	NW Colorado Oil and Gas Association	Other Comments: 1) Lyon 2000 is cited in the document but the reference is not found in the References section. 2) Pg. 3-64 states leks are identified on map 3-19, the leks are identified on Map 2-4.	All map references in the Proposed RMP/Final EIS have been updated. In addition, BLM has searched for a Lyon 2000 reference in the Draft RMP/EIS and has been unable to find one. Without additional specificity no change is possible. In-text references were checked against the references section and updated, as needed.
General/ Miscellaneous	NW Colorado Oil and Gas Association	2.3 RMP Goals –We can agree with RMP goals. NWCOS did collaborate on these RMP goals. We did one section we called overarching RMP requirements/goals/visions and in that section we recognized and respected valid and existing rights which the BLM has on page 1-9 under planning criteria, but one important statutory requirement which is not listed under the planning criteria or the RMP goals is the use and observe the principles of multiple use. We agreed on this and it should be in one of those sections.	The following three statements regarding multiple use management are included in chapter 1 of the Draft RMP/EIS: (1) Page 1-2: The purpose of the Little Snake RMP revision is to ensure that public lands are managed according to the principles of multiple use and sustained yield. (2) Page 1-3: An RMP is a set of comprehensive long-range decisions concerning the use and management of resources administered by BLM. In

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			general, an RMP accomplishes two objectives— -Provides an overview of goals, objectives, and needs associated with public lands management -Resolves multiple use conflicts or issues associated with those requirements that drive the preparation of the RMP. (3) Page 1-10: FLPMA, as amended (43 U.S.C. 1701, et seq.), provides for public lands to be generally retained in federal ownership for periodic and systematic inventory of the public lands and their resources; for a review of existing withdrawals and classifications; for establishment of comprehensive rules and regulations for administering public lands statutes; for multiple use management on a sustained yield basis; for protection of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; for receipt of fair market value for the use of the public lands and their resources; for establishment of uniform procedures for any disposal, acquisition, or exchange; for identification and protection of ACECs; for recognition of the nation's need for domestic sources of minerals, food, timber, and fiber from the public lands, including implementation of the Mining and Mineral Policy Act of 1970; and for payments to compensate State and local governments for burdens created as a result of the immunity of federal lands from State and local taxation. BLM believes these statements clearly convey that the Little Snake planning area will be managed under multiple use principles under the revised RMP.
General/ Miscellaneous	The Nature Conservancy in Colorado	Within Appendix M and the other plan components stated above, BLM incorporates some key principles of adaptive management. However, BLM will need to significantly strengthen and expand the adaptive management provisions throughout the RMP in order to effectively establish and implement an adaptive management program. Specifically, we urge BLM to: 1. Allocate land uses more conservatively at first. Appendix M describes the overall process by which BLM would identify necessary management changes. It sounds as though BLM will	The Draft RMP/EIS considered and analyzed a range of alternatives that made land use allocations across the use/preservation spectrum, while complying with BLM's multiple use mandate. This resulted in analysis of alternatives that would place on leases no surface occupancy stipulations or would close areas to leasing entirely on between 6% (Alternative B) and 38% of the RMPPA. Additional, less severe stipulations developed to provide varying degrees of protection to a variety of resources were

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		assess the extent to which a watershed or other landscape unit is meeting standards on a periodic basis, and if standards are not being met BLM would implement "an immediate management change" (p.M-5). To allow for effective system-level changes though, land use allocations must provide ample management flexibility. Therefore, we would urge BLM to allow for less intense and extensive uses initially, and allow for greater extent and intensity of uses over time as monitoring of standards demonstrates that additional uses can be comfortably supported. If the plan allows for a high intensity and extent of uses initially as we believe it does now (e.g., opening up the vast majority of the planning area to oil and gas leasing), it seems highly unlikely that BLM can make effective system-level changes in the future without costly and time-intensive plan amendments, if at all.	also analyzed. The existing environment information presented in chapter 3 is based on monitoring of standards and was considered in analyzing the alternatives and in developing a Proposed RMP that supports the uses anticipated. As supported by the impacts described in chapter 4, the Proposed RMP will provide a reasonable level of land uses and development activities while providing protection of the variety of natural and cultural resources.
General/ Miscellaneous	The Nature Conservancy in Colorado	The landscape health assessment reports (RMP Chapter 3) indicate that portions of many landscapes do not meet all land health standards currently. This would also suggest a conservative approach to allocating land uses is warranted in order to move these areas toward standard quickly, which is the stated goal. As the areas that do not currently meet standard are improved, management may be adjusted more quickly using the adaptive management approach. An additional approach could be to require more monitoring and a higher level of resource protection in the face of increased energy development. This approach was taken in the Dillon RMP in Montana.	Information from the land health assessments was used in developing and analyzing a range of alternatives that made land use allocations across the use/preservation spectrum, while complying with BLM's multiple use mandate. In the Proposed RMP/Final EIS, all recently completed landscape health assessments were updated in chapter 3 to ensure that information from the assessments would be considered in developing the Proposed RMP and analyzing its impacts. As supported by the impacts described in chapter 4, the Proposed RMP will provide a reasonable level of land uses and development activities while providing protection of the variety of natural and cultural resources. It is also important to note that revising an RMP to become less restrictive is the same process as revising an RMP to become more restrictive. The process for revising RMP decisions does not change, so the commenter is incorrect in stating that management may be adjusted "more quickly" to move management from more restrictive to less restrictive.
General/ Miscellaneous	The Nature Conservancy in Colorado	Observations and Recommendations for Little Snake. BLM describes desired outcomes and management actions for some biological resources in Chapter 2.5 of the Draft RMP – "Resource Descriptions and Management Considerations." We fully support that BLM has quantified a number of management actions throughout the plan, as quantitative figures will provide clear guidance to BLM and partners during plan implementation and for	The goals, objectives, and management actions are quantified where possible. At the RMP planning stage, it is difficult to quantify all actions because many proposed activities are not yet known. NEPA analysis conducted at the activity planning stage will include more quantification of actions and impacts.

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		adaptive management. For example, a vegetation treatment management action states, "An average of 50 acres per year of lodgepole pine…would be treated" (p. 2-14). However, non-quantitative desired outcomes and management actions are the norm throughout the plan. We understand that at present, BLM intends to defer most quantification of goals, objectives, and management actions to the AGD. We would strongly recommend, however, that BLM quantify as many goals, objectives, and management actions as possible in the RMP itself. It is essential that the goals and objectives be quantified for the public and BLM to adequately assess the future direction of the RMP. BLM's planning handbook (H-1601-1) would support this quantification – especially for objectives - as it states, "Objectives are usually quantifiable and measurable and may have established timeframes for achievement (as appropriate)" (p.12). The AGD could take years to develop, and in the meantime BLM will not have clear goals, objectives, and management actions under which to work.	
General/ Miscellaneous	The Nature Conservancy in Colorado	Observations & Recommendations for Little Snake. Appendix F includes a section on data collection and monitoring. It is helpful that Table F-1 lists indicators and justification for why each indicator was selected ("information indicator provides"). There are at least a couple key limitations to this table however: • It is not clear why BLM chose the indicators in Table F-1 versus the full suite of indicators it mentions in the AMS. Please explain how BLM chose the indicators in the table versus those in the AMS. Consider developing a table of the full suite of indicators that the AMS includes, along with additional indicators as needed to assess the range of management actions being proposed, and citing the priority for each with rationale. • It is not clear whether and how the indicators selected will allow BLM to clearly monitor progress toward desired outcomes. The plan must provide for more clear links between resource health; desired outcomes (goals and objectives) and management actions; monitoring priorities; and adaptive management triggers. We would urge BLM to apply the process we have outlined here to achieve this aim	In developing Appendix F, BLM determined the indicators that would be feasible to monitor and would best facilitate achieving desired outcomes. As part of this determination process, BLM identified some indicators in the AMS that were not necessary or appropriate. Additionally, as the implementation of the RMP proceeds other monitoring methods may become available. BLM is not limited to monitoring just the specific indicators noted in Appendix F, but may modify the list as resource conditions and priorities fluctuate. FLPMA grants BLM authority to maintain an inventory of public lands and their resource and other values. Through this authority, BLM may adopt monitoring methods and indicators that will track implementation and success of RMP goals and objectives.
General/ Miscellaneous	The Nature Conservancy in Colorado	Chapter 1.5. Planning issues and criteria, 1.5.2 Planning criteria (p.1-9): 5th bullet down states, "A strategy will be provided for reaching desired conditions and outcomes and meeting objectives." We fully support this strategy concept. Please explain where this	The goals, objectives, and management actions presented in chapter 2 were designed to identify and achieve desired outcomes. BLM believes Alternative C provides the best strategy to allow for various

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		strategy is located within the plan.	levels of resource use while protecting important resource values.
General/ Miscellaneous	The Nature Conservancy in Colorado	Appendix E - Procedures…for granting exception, modification or waiver, Introduction (p.E-1): Please state the resource uses to which this appendix applies.	An exception is a one-time relief from the stipulations or conditions of approval (COA) applied to an Application for Permit to Drill (APD) or from the stipulations applied to a right-of-way (ROW). Therefore, exceptions and waivers apply to mineral exploration and development activities and ROW development activities.
General/ Miscellaneous	Arthur Trenholme	I do not think that the U.S. Government gets an adequate return from this kind of exploitation. I think that at least 6% of the net profit plus additional funding for adequate supervision by the BLM of the site, roads, etc. needs to be required. Also, the companies doing this kind of think need to required to post a very substantial bond to make sure that the land is restored, in all ways, to its original state.	Establishing taxes on mineral production is not an RMP decision. In addition, the levels or limits of reclamation bonds is not a landscape-level decision, but is determined on a case-by-case basis at the implementation phase. As such, it is beyond the scope of the RMP
General/ Miscellaneous	Tri-State Generation and Transmission Association, Inc.	1. In the Proposed RMP/Final EIS, regardless of the number of volumes, and in the Record of Decision, include the chapter name, number, and major section in the header at the top of each page. This makes finding information and reviewing and reading the document easier. 2. Add the table number and name above each table, as a header cell that shows up at the top of the table on each succeeding page.	The Proposed RMP/Final EIS formatting has been revised to improve readability. This includes incorporation of some of the commenter's suggestions.
General/ Miscellaneous	Tri-State Generation and Transmission Association, Inc.	Lands and Realty (Page ES -14) Correct the map number that identifies the retention and disposal zones to number 2-40.	Map numbering has been updated throughout the Proposed RMP/Final EIS.
General/ Miscellaneous	Vermillion Ranch Limited Partnership	Pg 2-116-230 detailed list of analysis and impacts is left out. Generally these pages lack both a positive and negative description very one sided	Pages 2-116 through 2-214 of the Draft RMP/EIS present the goals, objectives and management actions for each alternative in a side-by-side format for ease of comparison. Pages 2-215 through 2-230 present a summary comparison of impacts. As noted on page 2-215, a more detailed analysis of impacts is included in chapter 4. Additionally, the Draft RMP/EIS sought to present impacts without the use of value-based terminology. As described in chapter 4 of the Draft RMP/EIS, "as impacts could be perceived as beneficial (positive) or adverse (negative) by different readers, these descriptors were not used to define impacts."

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Lands and Realty	Colorado Division of Wildlife	Additional emphasis should be placed on public access and significant wildlife habitat as reasons to retain or acquire isolated parcels. CDOW generally supports the division of the LSFO into three land tenure zones and understands the value of consolidating land ownership to facilitate management. However, small isolated parcels of BLM land, particularly some of those in the central and east zones, can provide crucial wildlife habitats and/or public recreational access of greater importance than their size and isolation would indicate. In highly private environments, these small parcels can provide the only protected habitats or public access. BLM should add criteria in the central and eastern zones in addition to those already in the draft to make crucial wildlife habitat or public access sufficient reasons to retain or attempt to acquire small or isolated parcels. CDOW has recently evaluated many of the smaller parcels in the east zone as part of the Emerald Mountain exchange. Parcels of particular interest for retention in public ownership include the Watson Creek parcels in T2N, R85W, Secs. 7, 8, 17, 18, 19 and T2N, R86W, Secs. 12, 13, 24 for protection of important greater sage-grouse and Columbian sharp-tailed grouse habitat and public access. The Bear Gulch and Middle Creek parcels have high habitat value for wildlife, especially elk. They are also primary destinations for hunter recreation, and due to their placement, have limited motor vehicle use. Many other BLM parcels within the Twenty-mile area also hold substantial habitat value for elk. The North Fork Middle Creek and Trout Creek parcels in particular, also hold a high risk for development potential in the near future.	Under Alternative C of the Draft RMP/EIS (pages 2-98 and 99), BLM identifies general criteria for land tenure adjustments. Each retention and disposal zone includes the criteria to facilitate better management of BLM lands and to benefit the public. Facilitating hunter access, as well as maintaining important habitats, could fall under these criteria. Prior to any land tenure adjustment, the values associated with the lands involved would be assessed on a site-by-site basis.
Lands and Realty	Colorado Division of Wildlife	CDOW supports the concept of exchanging lands to facilitate one-agency management adjacent to CDOW State Wildlife Areas and CDOW/SLB lease areas. Areas of particular interest are the various units of the Browns Park SWA, the Little Snake, Bitter Brush, and Indian Run SWAs, and the Jimmy Dunn CDOW/SLB lease area.	The Draft RMP/EIS direction for land tenure adjustments in Alternative C includes direction to "look to exchange lands with the appropriate local, state, and federal agencies to facilitate one-agency management..." While some specific areas are noted in each of the zones, the statement "including, but not limited to" provides sufficient flexibility to consider any area that meets the intent of this decision.
Lands and Realty	Chad Kurtenbach	The last parcel is T2N, R85W, section 4. This parcel was mentioned in the emerald mountain exchange but as far as I know was dropped. I would like to see this parcel remain in public ownership.	The Finding of No Significant Impact for the Emerald Mountain Land Exchange was signed by the Little Snake Field Office Manager on September 27, 2006, by the BLM State Director October 4, 2006, and was finalized by early 2007. That Amendment/EA had a public process associated with it. Decisions associated with that land exchange and amendment to the Little Snake RMP were addressed during that

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			process. The Proposed RMP addresses land disposal actions by retention and disposal zones, as shown on Map 2-20 of the Draft RMP/EIS. Site specific analysis would be required prior to any future land disposals.
Lands and Realty	Moffat County Commissioners	On p. 2-98 Land Tenure Adjustments, Moffat County is recommending Alternative A become preferred, where parcels are dealt with case-by-case and where the public interest is served. The three tiered system is not functional as a broad sweeping method because each parcel will have a different set of circumstances for acquisition or disposal and not fit into a textbook tier. As a long-standing policy, Moffat county supports sale of federal land to private entities but rarely acquisition of private land by BLM or other federal agencies. This generally takes private property off the tax rolls and grows the federal land base, something Moffat County is opposed to. We request that acquisitions occur only when the local community is involved and supports the acquisition of State or Private lands by federal agencies. We recommend BLM move alternative A to the preferred alternative in this section. If BLM does not do so, we request BLM not acquire private land without local governmental involvement, and furthermore request BLM respond as to why they will be managing inconsistent with the County Land Use Plan. Please incorporate this comment into p.2-98.	The three-tier approach is designed to provide BLM with maximum flexibility in land tenure adjustments, while providing management direction for land tenure adjustment priorities. Land tenure adjustments are addressed on a case-by-case basis, considering site-specific circumstances. Parties interested in land tenure adjustments, other than immediately affected parties, will be notified of such actions through the public NEPA notification process. Cooperating agencies may be involved, as defined by NEPA regulations.
Lands and Realty	Moffat County Commissioners	2) Vermillion Basin Zone 2 does not exist in the current preferred alternative, furthermore right of way exclusion areas were not part of the cooperating agency consensus for Vermillion Basin. We request this language be removed.	Managing a portion of Vermillion Basin as a ROW exclusion area is included in the Draft EIS under Alternative D. Alternative C (the Proposed RMP) of the Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including managing it as a ROW exclusion area.
Lands and Realty	Moffat County Commissioners	p. 2-100 Alternative C – Right of Way Exclusion Areas 1) Although the Black Footed-Ferret Plan does suggest minimal disturbance for 3-4 months within a ¼ mile of release sites, the BFF Plan's intent was not to reroute power lines or rights of way on public land around BFF habitat. Therefore Moffat County strongly objects to rerouting rights of way around BFF habitat and we request that all the alternatives be reworded to allow rights of way through BFF habitat. Furthermore, it is our belief that the spirit of Non-Essential Designation, through Section 10J of the Endangered Species Act, is that reintroduction of BFFs specifically means other land uses are not impacted because the BFFs are merely experimental to see if they can 'get along' with existing uses.	Black-footed ferret habitat is not a proposed exclusion area for ROWs. Occupied black-footed ferret habitat is included as a ROW avoidance area, which would not necessarily require that ROW facilities be re-routed around the habitat.

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Lands and Realty	Moffat County Commissioners	3) Moffat County requests Cold Springs and Dinosaur North do not have right of way exclusion areas since powerline corridors will be necessary to transmit power from wind energy and other activities.	Managing Cold Spring Mountain and Dinosaur North SRMAs as ROW exclusion areas is included under Alternative D. Upon evaluation of the impact analysis in chapter 4 and public comments on the Draft RMP/EIS, BLM determined that this management action will not be included in the Proposed RMP/Final EIS.
Lands and Realty	Moffat County Commissioners	5) Concentrating utility corridors along county roads should not be a blanket recommendation, as the County must adhere to strict visual obstruction standards from the State, something that a utility corridor along a county road would affect. We request language be added to clarify County Roads will not be considered as utility corridors on a case by case basis.	The language in the Draft RMP/EIS is only to “encourage” ROWs in following existing corridors, which does not require location of ROWs (including utility corridors) in the existing corridors. If state standards were to preclude a ROW along a county road it would not be permitted.
Lands and Realty	Moffat County Commissioners	p. 2-102 Easements Moffat County requests this section of the RMP direct BLM to publicly disclose all parcels delineated for easement acquisition prior to the easement acquisition process beginning.	Parties interested in easement acquisitions will be notified of such actions through the public NEPA notification process.
Lands and Realty	Moffat County Commissioners	p. 3-119 Communications Site Table Harper Hill, and Iles Mt. are two Communication sites that appear to be missing from this table.	BLM has reviewed the data to ensure that all applicable sites are included in the table.
Lands and Realty	Moffat County Commissioners	2) Vermillion Basin Zone 2 does not exist in the current preferred alternative, furthermore right of way exclusion areas were not part of the cooperating agency consensus for Vermillion Basin. We request removing exclusion areas regarding Vermillion in Alternative C.	Managing a portion of Vermillion Basin as a ROW exclusion area is included in the Draft EIS under Alternative D. Alternative C (the Proposed RMP) of the Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including managing it as a ROW exclusion area.
Lands and Realty	Becky Raney	Alternative C should not place the Limestone Ridge as a Right of Way Exclusion area.	Alternative C is one of the alternatives considered in the range of alternatives for the Draft RMP/EIS. Alternative B considers no restriction on ROWs for the Limestone Ridge area.
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	Issue 6: Lands and Realty (Page ES-4) Expand issue # 6 to discuss the influence that the reasonable and foreseeable development scenario for oil and gas wells would have on the need for the identification and designation of ROW corridors in the RMPPA to service this increase, especially in the western areas, where the bulk of the BLM surface management occurs. This related matter could also be a separate issue of concern in the RMPPA. Access and electrical service to or near the two RMPPA areas that are identified as having high potential for wind generated	Issue 6 (regarding ROWs) is as follows (see page 1-8 in the Draft EIS): "BLM regularly receives ROW applications for pipelines, roads, legal access, and communication sites. This plan will provide some direction for these uses." BLM believes the wording of this issue is appropriate and reflects that ROW corridors are an issue within the planning and are therefore addressed in the alternatives. BLM does not believe that changes to the issue statement are

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		electricity would also influence the need for ROW corridors. The high wind energy potential of these sites is non-existent without designated transmission line corridors.	necessary.
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	Lands and Realty (Page ES -14) Statement in DRMP --- The BLM administered lands in the RMPPA would be divided into three retention and disposal zones: the East, Central, and West zones (Map 2-37). Provision should be made for BLM ROW and Easements to be retained by the ROW grant holder or easement holder when parcels of BLM land are exchanged or sold. Without some provision for the continuation of the valid existing rights, the holder loses the right to occupy the land when the ROW expires. At the time the parcel is exchanged or sold a BLM ROW or Easement can be issued in perpetuity to the holder. Another way to insure continued use of the land parcel is to place a reservation in the patent recognizing the holder's authorization.	Existing ROWs located in land tenure adjustment areas would be dealt with on a case-by-case basis at the time of the land exchange. Dictating specific terms of a land tenure adjustment prior to the decision is not appropriate for a landscape-level RMP decision. The conditions on the ground at the time of the transfer should drive the potential action on any ROW.
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	Lands and Realty (Page ES -15) Statement in DRMP --- ROWs would be encouraged in existing corridors... If ROW corridors cannot be designated in this RMP effort, or the existing corridors on Map 3-38 recognized as official ROW corridors, then a statement should be included here and other appropriate locations in Alternative C, in Chapter 2, concerning designating ROW corridors when they become necessary. The RMPPA is anticipating major energy development in the future and electric transmission lines, distribution lines, pipelines, and possibly major transportation features, will be required to serve these energy facilities. In addition, when and if the anticipated development of Oil Shale becomes a reality, new transmission line corridors may be required to serve that segment of the energy industry, even though the oil shale resource is located to the south of the Little Snake Resource Planning Area. It is important to identify possible future transmission line corridors for development of future energy sources.	The following goal is included on page 2-97 of the Draft RMP/EIS: "Identify and establish major utility and transportation corridors within the planning area." This goal will be implemented throughout the life of the RMP. BLM believes this goal is very similar to the suggested text in the comment to designate ROW corridors when they become necessary. In addition, corridors have been identified in the planning area (see page 2-100 in the Draft EIS).
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	2.6.5 Lands and Realty (pg. 2-97) Lands and Realty Goal C ---First bulleted objective under this goal is to provide access for the development of renewable energy resources...manner. Add "and transmission line corridors" after the word access.	The Draft RMP/EIS already contains language to address this issue. Lands and Realty Goal C objective 2 (page 2-97) states that BLM will “provide access for the development of transportation routes, utilities, transmission lines, communication sites, and other uses, in an environmentally responsible

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			manner."
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	Rights of Way: Officially designating ROW corridors for all alternatives (A, B, C, & D) would be the best end result for the users and the public, as the locations where these facilities would be encouraged would be known. It is possible to identify future corridor needs by working with the electric power companies in the area (Tri-State, Xcel, Western Area Power Administration, Yampa Valley Electric), as well as corridor planning entities such as the Western Utility Group), and oil and gas companies, and other public land users. This effort may ultimately save RMP amendments in the future. Alternative A -- See above comments concerning ROW corridors. Alternative B -- See above comments concerning ROW corridors. Alternative C -- See above comments concerning ROW corridors. Alternative D -- See above comments concerning ROW corridors.	The National Energy Policy Act of 2005 requires the U.S. Department of Energy, BLM, and U.S. Forest Service to designate new right-of-way corridors on federal lands for electricity transmission and distribution facilities and oil, gas, and hydrogen pipelines. The DOE, BLM, and USFS are preparing the West-Wide Energy Corridor Programmatic EIS to evaluate issues associated with designation of energy corridors on federal lands. The Draft RMP/EIS, chapter 2 (page 2-99 and 100) does identify areas where minor ROWs would be encouraged. In addition, the Draft RMP/EIS (page 3-93) identifies the location of nine existing ROW corridors. Minor ROWs would be established on a case-by-case basis considering the issues and resource conditions at the time of establishment. While NEPA documentation is required for establishment of a ROW, an RMP amendment is not necessarily required.
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	Renewable Energy See the above discussion of the need for transmission line corridors from areas of renewable energy resources to connect with existing transmission line corridors that presently carry energy to the end users. It is important to have these corridors identified, if possible, or at least mentioned in the RMP renewable energy section. Alternative A -- See above comments concerning renewable energy ROW corridors. Alternative B -- See above comments concerning renewable energy ROW corridors. Alternative C -- See above comments concerning renewable energy ROW corridors. Alternative D -- See above comments concerning renewable energy ROW corridors.	The Draft RMP/EIS, chapter 2 (page 2-99 and 100) does identify areas where minor ROWs would be encouraged. In addition, the Draft RMP/EIS (page 3-93) identifies the location of nine existing ROW corridors. ROWs would be encouraged in these two types of areas. Regardless of the location, placement of ROWs would be established on a case-by-case basis considering the issues and resource conditions at the time of establishment.
Lands and Realty	Tri-State Generation and Transmission Association, Inc.	4.4.5 Impacts on Lands and Realty (pg. 4-190) In the paragraph that begins "The analysis is based on the following assumptions…" Add a section to insure that the rights of holders of existing ROWs and Easements are protected if the BLM lands are included in a disposal category. See the previous comments in other sections of this document. 4.4.5.1 - Alternative A -- See above comments concerning preservation of grant holder's rights, traditional ROW corridors, and	The Draft RMP/EIS states that valid existing rights would be recognized (e.g., pages ES-15, 1-9, 2-44, 7-16). Existing ROWs located in land tenure adjustment areas would be dealt with on a case-by-case basis at the time of the land exchange. Dictating specific terms of a land tenure adjustment prior to the decision is not appropriate for a landscape-level RMP decision. The conditions on the ground at the time of the transfer should drive the

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		renewable energy corridors. 4.4.5.2 - Alternative B -- See above comments concerning preservation of grant holder's rights, traditional ROW corridors, and renewable energy corridors. 4.4.5.3 - Alternative C -- See above comments concerning preservation of grant holder's rights, traditional ROW corridors, and renewable energy corridors. 4.4.5.4 - Alternative D -- See above comments concerning preservation of grant holder's rights, traditional ROW corridors, and renewable energy corridors.	potential action on any ROW.
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	Union commends the BLM for its efforts to update the RMP for the Little Snake Resource Area. Although the BLM has incorporated piecemeal amendments to this RMP since its adoption in 1989, the BLM should revisit the RMP to ensure that it reflects the nation's evolving priorities and the greater importance of wireless communications in modem life. In particular, Union urges the BLM to revise the RMP to facilitate the availability of federal lands for the siting of wireless communications infrastructure. While Union recognizes that the BLM must balance the management of various land uses, it recommends the adoption of Alternative B or Alternative C because they would increase the availability of federal lands and reduce the restrictions on land use. Union also would support the continuation of the existing management plan under Alternative A, with certain revisions to promote access to BLM-administered lands.5 Regardless of the alternative selected, the BLM should designate additional utility corridors for the siting of wireless communications infrastructure and follow a flexible approach to the siting of such infrastructure in areas outside of such corridors.	See General Comment Response #45
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM should increase the availability of federal lands for wireless communications infrastructure in accordance with numerous federal laws and policies. Specifically, the BLM should prepare a Final EIS and revised RMP that comply with the executive and legislative directives supporting the construction and use of wireless communications infrastructure on federal lands. The siting of communications towers on federal lands also would further federal policies concerning the enhancement of public safety and emergency communications and the expansion of telecommunications services to rural areas, Finally, the siting of wireless communications infrastructure is otherwise consistent with the BLM's management priorities under the Federal Land Policy and	See General Comment Response #45

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		Management Act of 1976 ("FLPMA") and the National Environmental Policy Act of 1969 ("NEPA").	
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	5 Under no circumstances, however, should BLM adopt the Alternative D proposal to limit all new communications facilities to existing sites. U.S. Department of the Interior, Bureau of Land Management, Draft Environmental Impact Statement for the Little Snake Resource Management Plan 4-194 through 4-195 (2007) (Little Snake Draft EIS). Alternative D would impose unnecessary design and siting requirements on wireless licensees that could (1) restrict the placement of communications sites; (2) limit future access to sites; (3) create dead zones in wireless coverage; (4) delay the availability of communications service in rural areas; (5) require the siting of communications sites in less-desirable locations or in areas with additional restrictions on accessibility or construction; and (6) increase the cost of deploying wireless communications service. Id	Upon evaluation of public comments on the Draft EIS and the impact analysis in chapter 4 of the Draft EIS, BLM has determined that the related actions included in Alternatives B and C (see page 2-102 of the Draft EIS) would be included in the Proposed RMP. The action included in the Proposed RMP would be as follows: "All sites would be open except in ROW exclusion areas. Priority would go to collocation of facilities and use of existing sites to minimize number of total sites. Use, where possible, best available technologies, such as tower guy wires, to reduce migratory bird mortality."
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The Little Snake Resource area is within Union's licensed wireless service area. As depicted on a map of Union's Global System for Mobile Communications (GSM) home coverage area: Union already provides coverage to portions of this Resource Area, Although Union has constructed or otherwise uses several wireless communications towers in the Little Snake Resource Area, it will need to construct other towers in this Resource Area in the future. Thus, this proceeding directly impacts Union's existing and proposed operations.	See General Comment Response #45
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM has received directives from the President and Congress to implement the nation's strategy for wireless communications. Over the past twelve years, the executive and legislative branches have prodded land management agencies to encourage and facilitate the siting of wireless communications infrastructure on federal property. These directives initially appeared in the mid-1990s in (1) an Executive Memorandum; (2) the Telecommunications Act of 1996; and (3) a General Services Administration Bulletin. The BLM's Washington Office subsequently issued an Instruction Memorandum providing guidance to its field offices on rights-of-way planning. President Bush also issued an Executive Memorandum reiterating the importance of expanding the deployment of telecommunications infrastructure on federal lands.	See General Comment Response #45
Lands and Realty	Union Telephone Company	The BLM should give substantial weight to public safety considerations in its preparation of a Final EIS and revised RMP for the Little Snake Resource Area, Although the BLM already	See General Comment Response #45

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	(through McDermott Will & Emery)	considers safety issues when ruling on individual right-of-way applications. Congress has enacted several other statutes to encourage and facilitate the deployment of wireless communications infrastructure for public safety purposes. The BLM should incorporate the policies reflected in those statutes into the Final EIS and revised RMP for the Little Snake Resource Area.	
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM should facilitate additional siting of communications towers in the Little Snake Resource Area because this Area lacks any other feasible alternatives to satisfy this statutory mandate.	The following goal is included on page 2-97 of the Draft EIS: "Provide access for the development of transportation routes, utilities, transmission lines, communication sites, and other uses, in an environmentally responsible manner." The management action included in the Proposed RMP regarding development of communication sites (included under Alternatives B and C of the Draft EIS) is as follows: "All sites would be open except in ROW exclusion areas. Priority would go to collocation of facilities and use of existing sites to minimize number of total sites. Use, where possible, best available technologies, such as tower guy wires, to reduce migratory bird mortality." This goal and management action addresses the need and BLM's commitment to provide for the development of communication sites.
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	Union has committed to the deployment of emergency communications throughout its service area. To provide these communications, however, Union will need to construct wireless communications infrastructure. Thus the BLM should prepare a Final EIS and revised RMP to encourage and facilitate the siting of this infrastructure on federal lands in the Little Snake Resource Area.	See General Comment Response #45
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM would enhance public safety and emergency communications if it prepared a Final EIS and revised RMP to facilitate the siting of wireless communications infrastructure in the Little Snake Resource Area. Although Union offers commercial service in Wyoming, Utah, and Colorado, its subscribers expect to receive access to emergency communications as part of this service. As explained below, Union needs to construct and use wireless communications infrastructure on BLM-administered land throughout its service area, including the Little Snake Resource Area, to ensure the availability of such emergency communications.	See General Comment Response #45
Lands and Realty	Union Telephone	Although Union has attempted to accommodate requests for more coverage, its capacity and terrain coverage are not sufficient to	There is extensive acreage open to the consideration of ROWs throughout the RMPPA, including in the

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	Company (through McDermott Will & Emery)	provide the necessary level of emergency communications services required by subscribers outside of populated areas. For example, Union has identified several coverage gaps along U.S. Highway 40, as well as along other smaller state and county roads in the Little Snake Resource Area. Over the next two or three years, Union will attempt to fill significant coverage gaps on Colorado State Highways 13, 14, and 131, as well as gaps in the oil and gas areas. Union also lacks coverage in the Greystone area, has several coverage gaps on the road from Browns Park to Maybell, and has little or no coverage along the twenty-mile road from Hayden to Oak Creek. These dead zones raise public safety concerns regarding the lack of access to emergency communications arising from accidents, range fires, medical emergencies, and winter storm conditions. To provide the capacity and terrain coverage necessary to make emergency communications available in these and other areas, Union will need to construct wireless communications infrastructure on BLM-administered land in the Little Snake Resource Area.	areas identified.
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The cost of building wireline service is prohibitive. In the Little Snake Resource Area, most of these tellular customers are in Browns Park and western Moffat County. Without tellular service, none of these customers could afford telephone service. Union needs to provide tellular service to remote areas, such as Greystone, where cellular service is not currently available. Thus, the BLM should prepare a Final EIS and revised RMP to facilitate the deployment of wireless communications infrastructure to permit the provision of these much-needed telecommunications and broadband services.	See General Comment Response #45
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM should prepare a Final EIS and revised RMP for the Little Snake Resource Area to facilitate the siting of wireless communications infrastructure on federal lands because it would further the statutory and regulatory goals of land-use planning. Although the BLM must balance the management of various land uses in the Little Snake Resource Area, the siting of wireless communications infrastructure would (1) be consistent with the existing RMP; (2) not compromise public resources; (3) support other uses of federal lands; (4) correspond to the policies of other governmental entities; and (5) benefit the local economy and the use of adjacent non-federal areas.	See General Comment Response #45
Lands and Realty	Union Telephone Company (through McDermott Will	The BLM should continue to evaluate applications for wireless communications infrastructure on a case-by-case basis rather than adopting blanket prohibitions. Although Alternative A would allow case-by-case review of communications site proposals, Alternatives B and C appear to preclude the siting of wireless communications	See General Comment Response #45

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	& Emery)	infrastructure in exclusion areas. The BLM should allow wireless providers to conduct studies demonstrating that their proposed wireless communications infrastructure would not interfere with public resources throughout the Little Snake Resource Area, including in exclusion areas, due to minimal surface disturbance, the absence of continued human presence, or other mitigating factors.	
Lands and Realty	Union Telephone Company (through McDermott Will & Emery)	The BLM should ensure that the Final EIS and revised RMP for the Little Snake Resource Area are consistent with the policies of other governmental entities. Section 202 of the FLPMA requires the BLM to "coordinate the land use inventory, planning, and management. With the land use planning and management programs of other Federal departments and agencies and of the States and local governments." In its FLPMA regulations and Handbook, the BLM commits to avoiding inconsistencies with the resource-related plans, policies, and programs of other governmental entities. Sections 101 and 102 of the National Environmental Policy Act similarly require the BIM to prepare analyses and documentation "in cooperation with State and local governments" and other agencies with jurisdiction by law or special expertise. To comply with these statutory requirements, the BLM should join other federal agencies in implementing the national policy toward the deployment of wireless communications infrastructure on federal lands. For example, the National Park Service requires Park Superintendents to "consider the potential benefit of having telephone access to emergency law enforcement and public safety services," underlining the importance of public safety and emergency communications on and adjacent to federal lands. Park superintendents also must "consider whether the proposal would cause unavoidable conflict with the park's mission," indicating that the National Park Service would prohibit only those wireless communications towers that arc incapable of mitigating potential harm. The BLM also should coordinate its Final EIS and revised RMP for the Little Snake Resource Area with local governments. As discussed above, Union has received requests for improved coverage, emergency communications, and enhanced 911 service from local governmental entities in several portions of its service area.	BLM has worked with cooperating agencies at the state and local level throughout the development of the Draft EIS. The Federal Land Policy and Management Act (of 1976) (FLPMA) requires that BLM coordinate with and incorporate the land use plans of other federal, state, and local agencies and governments “to the extent consistent with the laws governing and administration of the public lands”, “to the extent practical”, and “to the extent consistent with federal law and the purposes of this Act (FLPMA)”. BLM considered local and state plans and policies in developing the alternatives. The following goal is included on page 2-97 of the Draft EIS: "Provide access for the development of transportation routes, utilities, transmission lines, communication sites, and other uses, in an environmentally responsible manner." The management action included in the Proposed RMP regarding development of communication sites (included under Alternatives B and C of the Draft EIS) is as follows: "All sites would be open except in ROW exclusion areas. Priority would go to collocation of facilities and use of existing sites to minimize number of total sites. Use, where possible, best available technologies, such as tower guy wires, to reduce migratory bird mortality." This goal and management action addresses BLM's commitment to provide for the development of communication sites (which include wireless-related communication sites).
Lands and Realty	Union Telephone Company (through	Finally, the BLM should follow a flexible siting policy to expand wireless communications service to rural areas. As mentioned above, over the next few years, Union will need to install wireless communications infrastructure on BIN-administered lands to resolve	See General Comment Response #45

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	McDermott Will & Emery)	various coverage gaps outside of populated areas in the Little Snake Resource Area	
Lands and Realty	Vermillion Ranch Limited Partnership	Pg ES-14 Lands and realty Oppose tiered disposal system should be same area wide and criteria for disposal should recognize agriculture and livestock sustainability as a reason to transfer land by sale or trade to true agricultural operations	The tiered approach does not preclude land tenure adjustments, but it identifies the likelihood of the criteria being met across the RMPPA. Criteria considered in all the zones are public benefit, as well as facilitating better management of public lands and resources.
Lands and Realty	Vermillion Ranch Limited Partnership	Pg 2-98-99 2.6.5.2 Land and realty oppose zone concept and specifically only tying sale or exchange to land in resource area as it violation of Moffat County land plan for no net loss and support private acquisitions that sustain ranching as a priority criteria for disposal.	The three-tier approach is designed to provide BLM with maximum flexibility in land tenure adjustments, while providing management direction for land tenure adjustment priorities. While the Moffat County plan includes a no net loss statement, such a concept is not part of any federal law, regulation or policy. The direction contained in FLPMA is that "public lands be retained in Federal ownership, unless as a result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular parcel will serve the national interest." When private acquisitions meet this broad criteria, as further clarified in the Draft RMP/EIS, they would be considered.
Lands and Realty	Vermillion Ranch Limited Partnership	Pg 2-99-102 ROW Oppose the use of BF Ferret to stop ROW that was not in plan Black Footed Ferret Recovery Plan. ROWs along county roads may impair visuals. Closed areas are inconsistent with renewable's objective.	Black-footed ferret habitat is not a proposed exclusion area for ROWs. Occupied black-footed ferret habitat is included as a ROW avoidance area, which would not necessarily require that ROW facilities be re-routed around the habitat. The potential impairment of visual resources by encouraging ROWs along county roads would vary based on which county road, the VRM class in that area, and the type of ROW. These would be addressed on a case-by-case basis to consider the site-specific conditions and the proposed action, if and/or when any is made.
Lands and Realty	Vermillion Ranch Limited Partnership	Pg 2-102 Easements: Delineate and disclose Easements or Lands slated for acquisition of private lands for full NEPA discloser which is a requirement for this document; other RMPs (IE) Rocksprings have done this.	On Page 2-204 of the Draft EIS, under Land Tenure Adjustments, BLM identifies areas in which opportunities for acquisition of lands would be considered.
Lands and Realty	Vermillion Ranch Limited	Pg 2-102 Renewable Energy: More than just excellent Category should be emphasized if trying to encourage renewable energy	The decision in the Draft RMP/EIS just notes that "wind energy would be encouraged in areas rated excellent and above..." This decision does not

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	Partnership	objectives.	require excluding all proposals in areas rated less than excellent. The Draft RMP/EIS refers readers to the ROW section, which identifies the actual restrictions on ROW placement.
Lands and Realty	Wilderness Society (The), et. al.	XV. LAND TENURE ADJUSTMENTS Section 102(a)(1) of FLPMA requires that BLM-managed lands be retained in federal ownership unless BLM determines through the land use planning process that disposal of a particular parcel will serve the national interest. 43 U.S.C. 1701. Land tenure decisions must achieve the goals, standards, and objectives outlined in the land use plan. BLM should focus future land tenure decisions with an eye towards providing adequate public open space, maintaining key viewsheds and taking into consideration new proposals for open space, non-motorized trails and special management areas. Along with the growing population of Craig and the other population centers within the planning area has come a desire to develop more land, some of which may be appropriate. However, the BLM must retain land near sensitive and ecologically important areas, including all those within existing or proposed ACECs, SRMAs, lands with backcountry characteristics, WSAs, lands with wilderness character, and areas for open space. BLM's preferred alternative states that, in all three zones, "Sales should be tied to identification of the purchase of nonfederal lands within the LSFO, as appropriate and in the public's interest" (Draft RMP, pp. 2-98 – 2-99). While we applaud BLM for stating that all land disposal should be tied to land acquisition, BLM should mandate a "no net loss" of public land policy and clearly identify the types of areas whose acquisition will be tied to any land disposal. Recommendations: The BLM should amend the RMP language regarding exchanging or selling lands within each Zone. The following statement, present in the description of each zone in Alternative C, presently reads: …exchange or sell lands (surface and/or mineral estate) to facilitate better management of BLM lands and to benefit the public. Sales should be tied to identification of the purchase of nonfederal lands within the LSFO, as appropriate and in the public's interest. This section of the RMP should be amended in each zone to read (changes in brackets): …exchange or sell lands (surface and/or mineral estate) to facilitate better management of BLM lands and to benefit the public. Sales [must] be tied to identification of the purchase of nonfederal lands	Adopting a "no net loss" policy for public land disposals does not take into account that some land actions could dispose of scattered tracts of public lands with low ecological values in exchange for fewer acres of lands with very high values (e.g., riparian areas, cultural resources, critical habitats, viewsheds). A "no net loss" policy would preclude any land actions that would reduce the overall acreage of public lands, regardless of the ecological, recreational, or otherwise beneficial values on the lands being acquired. As such, BLM does not feel it in the best interest of the American public to adopt such a policy. Concerning the commenter's recommended changes to the lands and realty disposal criteria, the criteria already include areas in each zone where BLM would retain and seek acquisition of additional lands within specific acquisition areas. The language is also written such that if priorities for acquisition change over time, the RMP would still accommodate acquisition without an RMP amendment.

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		within the LSFO, as appropriate and in the public's interest [including private or state inholdings within WSAs, proposed wilderness, lands with wilderness characteristics, backcountry areas, ACECs, SRMAs, and areas proposed for public open space.]	
Lands With Wilderness Characteristics	Barbara Banke	I ask that your land management plan for the Little Snake area preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Michael Bartell	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Mark Bartleman	The BLM should adopt Alternative D with modifications, offering a balanced approach to protect unspoiled wildlands of northwest Colorado, including the Vermillion Basin. Your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Sheila Bruggen	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Marian Buckner	These spectacular values will be lost if over one million acres of this wild corner of the United States are opened to industrialization. Instead, your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Ed Burnham	Please protect our natural and cultural heritage by BANNING HARMFUL DRILLING AND OFF-ROAD VEHICLE USE in the Vermillion Basin and all other wilderness-quality lands in that region.	See General Comment Response #4
Lands With Wilderness Characteristics	Ann & Bill Burton	The BLM should adopt Alternative D with modifications, which would offer a balanced approach to protect the unspoiled wildlands of northwest Colorado, including the Vermillion Basin. The Little Snake Resource Area and its outstanding wildlands provide vital habitat to an incredible array of wildlife, including pronghorn, elk, mule deer, white-tailed prairie dogs, greater sage grouse, golden eagles and peregrine falcons. It is also home to some of our nation's most important archeological treasures, ancient petroglyphs and pictographs.	See General Comment Response #4

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Lands With Wilderness Characteristics	Hope Carr	The BLM's land management plan for the Little Snake Resource Area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Colorado 500	"Areas with Wilderness Characteristics": We totally object to any special management prescription for these areas. The court case settlement was clear that no new WSA were to be designated. You now propose something like a WSA-Lite for these lands which is unwarranted and perhaps illegal. A proposal from fringe extremists does not warrant a special management category. The anti-access, anti-use crowd has repeatedly caused the BLM to waste millions of dollars attempting to circumvent the original wilderness inventory, the only one authorized by Congress. To give this one-sided effort any credence whatsoever should not occur. There should be no special management prescriptions for these areas and OHV travel should be as on the majority of other BLM lands, limited to existing roads and trails. You have no authority to treat lands not officially designated as WSA as such.	See General Comment Response #15
Lands With Wilderness Characteristics	Colorado Off-Highway Vehicle Coalition (COHVCO)	Regarding the “areas with wilderness characteristics”, we see no precedent for such designations. No more WSAs is the court’s direction and a thinly veiled attempt to create a de facto WSA is probably a bad idea at a minimum, and illegal in the worst case. Certainly it will merit a serious legal challenge at the appropriate time. We urge you to drop this specific management prescription and manage for existing roads and trails.	See General Comment Response #15
Lands With Wilderness Characteristics	Elizabeth Conlan	Please evaluate the intrinsic, as well as the economic value of Colorado's Vermillion Basin when formulating your policy.	Economic impacts resulting from a range of management actions for Vermillion Basin are considered in the socioeconomic analysis (Section 4.5). This section includes a discussion of how non-market values would be affected from BLM’s management alternatives.
Lands With Wilderness Characteristics	Andrea Cousins	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Andra Cox	I’d like to see the adoption of alternative D for the Little Snake Draft. It would preserve Vermillion Basin as a wilderness and keep it intact. Any drilling is going to cause problems to the environment there on some level, and I’d hate to see it ruined. It is such a different type of ecosystem that shouldn’t be damaged.	See General Comment Response #4
Lands With	Andra Cox	The 2001 decision to keep Vermillion Basin as a wilderness, closed	See General Comment Response #4

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Wilderness Characteristics		to drilling should continue to stand. I don't have a problem if directional drilling is adopted, as it isn't as destructive.	
Lands With Wilderness Characteristics	Randy DeLeo	The Little Snake Resource Area and its outstanding wildlands provide vital habitat to an incredible array of wildlife, including pronghorn, elk, mule deer, white-tailed prairie dogs, greater sage grouse, golden eagles and peregrine falcons. It is also home to some of the nation's most important archeological treasures, ancient petroglyphs and pictographs. People from around the state, the region and even the world seek out northwest Colorado for outdoor recreation, wildlife viewing, and solitude. These spectacular values will be lost if over one million acres of this wild corner of the United States are opened to industrialization. Instead, your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Jennifer DiMeo	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Margarita & Steven Downs	1. Close the seven and (7) proposed Wilderness Study Areas, including the Vermillion Basin, to Leasing activities and Off-Road Vehicle (ORV) use until a complete and thorough inventory can be completed for Cultural Resources and Wilderness Qualities. You have technical data in hand that indicates that these areas contain approximately 6% of the LSRA land mass, less than 5% of the technically recoverable gas and less than 1% of the technically recoverable oil. Surely "set aside" of this small percentage of the LSRA can allow Leasing/Extrication over much of the LSRA.	See General Comment Response #4
Lands With Wilderness Characteristics	Environmental Protection Agency (EPA), Region 8	BLM has determined that more than 77,000 acres of the Vermillion Basin contain wilderness characteristics. Vermillion Basin is not currently leased for oil and gas development. The DEIS proposes to allow one percent of a leased unit in the Vermillion Basin to be disturbed by oil and gas activities at one time. EPA is concerned that this plan does not demonstrate how it will protect the natural and scenic value of the Basin, which is stated as an objective of this plan (DEIS page 2-47). EPA suggests that the EIS describe the proposed project impacts and cumulative impacts analyses before making leasing decisions for the Vermillion Basin. In addition, EPA recommends that BLM fully describe its balancing of various uses, particularly in consideration of BLM's 2001 determination of the wilderness characteristics of most of Vermillion Basin and the	The Draft RMP/EIS impact analysis acknowledges that even with the 1% surface disturbance limitation, oil and gas development would be a significant impact to wilderness characteristics in Vermillion Basin. The impact analysis in Section 4.3.11.2 has been updated to further disclose impacts from visual intrusion and noise, as well as reclamation issues. In addition, Alternative D of the Draft RMP/EIS for Vermillion Basin addresses managing the area for its wilderness characteristics, which includes closing the area to oil and gas leasing (See Map 2-16). Alternative C (Proposed RMP) of the Proposed RMP/Final EIS has been revised to manage

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		public's significant interest in maintaining the pristine nature of this area.	Vermillion Basin for its wilderness characteristics. The 1% surface disturbance limitation is still considered in the Final EIS, but as part of Alternative B.
Lands With Wilderness Characteristics	Robert A. Evangelista	Your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Form Letter #2	Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Form Letter #6	The final RMP should protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and OHVs. One study finds that if the proposed wild lands (amounting to only 6% of the surface acres) were protected, less than 5% of the gas and 1% of the oil would be off limits. If you compare that amount in terms of annual U.S. consumption, it is equivalent to 10.4 days and 7.5 minutes of gas and oil consumption, respectively, that would be off limits to development. It is not worth the fragmentation of this delicate ecosystem in the high desert basin, or the loss and degradation of sage grouse habitat.	See General Comment Response #4
Lands With Wilderness Characteristics	Form Letter #8	Preserve the seven (7) citizen-proposed wilderness areas by managing them for their wilderness character, as well as for their numerous unique values such as outstanding wildlife habitat, irreplaceable cultural resources, exceptional primitive recreation opportunities and solitude. • For all seven (7) Citizens' Wilderness Proposal Areas, BLM must withdraw them from mineral entry, close them to motorized traffic and manage them to protect the aforementioned unique values that they possess. • Existing grazing uses will be permitted within the proposals as they represent a historic use of the land and play an important role in our rural custom and culture.	See General Comment Response #4
Lands With Wilderness Characteristics	Form Letter #8	•All seven (7) Citizens' Wilderness Proposals must be closed to motorized access in order to prevent degradation to their respective wilderness character.	See General Comment Response #4
Lands With Wilderness Characteristics	Charles Garvin	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4

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Lands With Wilderness Characteristics	Wade Haerle	I hope the BLM will reject the call to make the Vermillion Basin a wilderness area as part of the RMP process. Wilderness designation can only be done by Congress. Such designations in an RMP process are illegal. I would suggest the land use designation in Vermillion Basin be consistent with the Energy Policy Act of 2005 and the BLM must justify any other decision with an Energy Impact Statement if the proposed designation does not allow energy development.	See General Comment Response #15
Lands With Wilderness Characteristics	Lynn Hague	It is in the national interest in the unspoiled lands of the Little Snake. The top priority should be to protect the pristine roadless areas you have left.	See General Comment Response #4
Lands With Wilderness Characteristics	Lynn Hague	We ask BLM to protect the 7 areas proposed for wilderness in Rep, Diana DeGette's bill, the Colorado Wilderness Act (R 4587) - Vermillion Basin, Dinosaur Additions, Cross Mountain, Cold Spring Mountain, Diamond Breaks, Pinyon Ridge, and Yampa River. All those areas should be closed to off-road vehicles and oil/gas leasing. BLM should leave it to Congress to decide whether these should be protected as wilderness.	See General Comment Response #4
Lands With Wilderness Characteristics	Rick Hammel	Lands With Wilderness Characteristics Outside Existing WSAs Page 2-47 We have to support Alternative D. As horizontal drilling is further developed and perfected, drill rig will be able to set up outside Vermillion Basin and extract product without destroying the wilderness character of Vermillion Basin. Any kind of disturbance will detract from the solitude that makes the Basin so desirable. The scenic values are so magnificent. These views can be seen from the BLM Road 2058 along the top of Vermillion Bluffs. OHV use anywhere near lands with wilderness characteristics, in time, will render these land unsuited for wilderness designation. It is unfortunate to write this, but it is true. This writer has had 50 years of OHV experience. I have promoted extremely large scale races, with up to 1200 riders in the California Desert. Course workers intentionally routed the race course into a WSA. This is the mindset of 10% of the OHV community, I am sorry to say. From conversations with local OHV users, and what I have witnessed on the ground, OHV use is impacting lands wherever they're allowed. Consequently, if BLM wants to keep wilderness quality lands pristine, it will have to develop a buffer zone that will absorb excursions into it and protect the wilderness quality lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Arlene Hoffman	Please do not open the Little Snake Resource Area to oil and gas drilling and off-road vehicle traffic. This area is home wildlife including pronghorn, elk, mule deer, white-tailed prairie dogs,	See General Comment Response #4

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		greater sage grouse, golden eagles and peregrine falcons, as well as to ancient petroglyphs and pictographs.	
Lands With Wilderness Characteristics	Arlene Hoffman	-preserve the wild nature of the Vermillion Basin and all other proposed wilderness.	See General Comment Response #4
Lands With Wilderness Characteristics	Howard County Bird Club	We call particular attention to the units adjoining Browns Park NWR and Dinosaur National Monument. These units have added value because their natural character contributes to the values of the refuge and the monument. The Diamond Breaks unit protects lands to the west of the northern (Lodore Canyon) panhandle of Dinosaur and lands to the south of Browns Park NWR. Several of the Dinosaur Adjacent units protect northern tributaries of the Yampa River, which flows through the eastern panhandle of the monument.	See General Comment Response #4
Lands With Wilderness Characteristics	Howard County Bird Club	We favor secure protection in the final plan for all seven areas in the citizens' wilderness proposal, totaling 275,000 acres, as shown in the plan on Map 3-27: Vermillion Basin, Cold Spring Mountain, Diamond Breaks, Cross Mountain, Dinosaur Adjacent, Pinyon Ridge, and Yampa River. These areas should be off-limits to oil and gas leasing and should be closed to off-road vehicle traffic to protect their wildlife values and wilderness character. In due course the United States Congress will consider these for possible designation as wilderness. Nothing should be allowed to impair their wilderness	See General Comment Response #4
Lands With Wilderness Characteristics	Barbara Hughes	Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Bill Israel	Your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use.	See General Comment Response #4
Lands With Wilderness Characteristics	Jimmy Juel	I am writing you to let you know that I favor Alternative C for the Little Snake Resource Area with the stipulation that Vermillion Basin be closed to all oil and gas development. Having recently flown over the subject area, I was amazed that an oasis free from drilling sites was still intact. Amongst the thousands of other drilling sites located in NW Colorado, this virgin wilderness stands alone as the last, large, intact ecosystem to provide habitat for the sage grouse, a bird that has been petitioned for the endangered species list. Instead of desecrating this beautiful area for resource extraction, this area should be seriously considered for federal wilderness designation that would protect it from all future development.	See General Comment Response #4

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Lands With Wilderness Characteristics	Angie & Ken Cairn	I am most hopeful that the RMP will establish stronger protections for wilderness lands, i.e., withdraw them from OHV use and O & G leases.	See General Comment Response #4
Lands With Wilderness Characteristics	Kathy Kilmer	Please establish a management plan that protects all proposed wilderness from O&G development and from ORVs.	See General Comment Response #4
Lands With Wilderness Characteristics	Robert H. King, Dr.	I would like the plan to place strong protections on proposed wilderness lands to safeguard the wildlife habitat, opportunities for hiking and other recreation, clean air and water, and cultural resources that these lands provide. For example, the plan should close the Vermillion Basin and the six other proposed wilderness areas to off-road vehicle (ORV) use, and withdraw them from mineral leasing and drilling, and should classify them as right-of-way exclusion areas.	See General Comment Response #4
Lands With Wilderness Characteristics	Jan & Gayla Kobialka	The official "preferred alternative" (Alternative C) is a giveaway to the oil and gas industry, opening 93 percent of the planning area to leasing and possibly leading to 3,000 gas wells or more. It fails to protect Vermillion Basin and some other wilderness candidate areas. No doubt the Bush administration is putting pressure on BLM to advocate this king of unbalanced plan. Please resist that pressure and reject Alternative C.	See General Comment Response #4
Lands With Wilderness Characteristics	David Korr	Instead, close Vermillion Basin and the other wilderness lands cited in the proposal to oil and gas drilling and off-road vehicles. Certainly the conditions put forward by the Wilderness Society are compromise enough with our overwhelming need to salvage our ever-more threatened natural world.	See General Comment Response #4
Lands With Wilderness Characteristics	Lisa Maragon	Please place strong protections on Vermillion Basin and the six other proposed wilderness areas in your RMP: -close them to off-road vehicles -withdraw them from mineral leasing and drilling -classify them as right-of-way exclusion areas.	See General Comment Response #4
Lands With Wilderness Characteristics	Caitlyn McKenzie	Seven areas fall within the RMPPA: Cold Spring Mountain, Cross Mountain, Diamond Breaks, Dinosaur Adjacent (which includes six units and is also referred to as Dinosaur Wilderness Additions), Pinyon Ridge, Vermillion Basin, and Yampa River). BLM conducted an inventory of Vermillion Basin in 2001 and determined that more than 77,000 acres contained wilderness character. Although some of these areas contain oil and gas potential, the BLM must balance protection and resource management. I support moving forward with	See General Comment Response #4

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		Wilderness Protection for these listed areas with detailed protection from long-term destructive uses like oil and gas and OHV use.	
Lands With Wilderness Characteristics	William Mockovak	Keep drilling and off-road vehicle use out of the Vermillion Basin.	See General Comment Response #4
Lands With Wilderness Characteristics	Moffat County Commissioners	p. 2-47 Lands With Wilderness Characteristics Outside Existing WSAs Moffat County has repeatedly objected to BLM's ability to manage lands as defacto wilderness, which this category of land management does. Although BLM has justified this through their own internal policies, Moffat County believes these policies are not consistent with recent law and Department of Interior policy. A complete legal brief is attached explaining why BLM does not have authority to conduct such activities.	See General Comment Response #15
Lands With Wilderness Characteristics	Moffat County Commissioners	We also recommend that these areas have the Right of Way Avoidance area removed from alternative C. On Cold Springs Mountain, it is perplexing why wind energy would be allowed, yet a power transmission right of way would not. We request Right of Way Avoidance areas only be considered in Alternative D, not C.	A ROW avoidance area does not necessary preclude ROWs. In chapter 7, “Avoidance Area” is defined as: “Areas with sensitive resource values where rights-of-way and Section 302 permits, leases, and easements would be strongly discouraged. Authorizations made in avoidance areas would have to be compatible with the purpose for which the area was designated and not otherwise be feasible on lands outside the avoidance area.” Alternatives A and B in the Draft RMP/EIS contain no ROW restrictions for the Dinosaur North and Cold Spring Mountain wilderness characteristics areas.
Lands With Wilderness Characteristics	Moffat County Commissioners	p. 2-222 Impact Comparison on lands with wilderness characteristics Moffat County requests the alternative comparison address loss of other uses such as motorized recreation and general access on federal land, not simply mineral lease impacts.	The impacts described on page 2-222 of the Draft RMP/EIS in the impacts summary table (Table 2-47) addresses impacts to Non-WSA lands with wilderness characteristics from other resources. Impacts such as the loss of OHV opportunities are described in the OHV Section (page 2-229 of the Draft RMP/EIS) and Section 4.4.6.
Lands With Wilderness Characteristics	Moffat County Commissioners	p. 4-123 Impacts to Lands with Wilderness Characteristics 1) Impact analysis only focused on impacts to the land surface. We request this section analyze the impacts to the land users who are restricted from traditional uses and access. 2) Moffat County requests there be an analysis of impacts to the community from removing these lands to mineral entry.	The impacts requested will not be located in the portion of chapter 4 that addresses impacts to non-WSA lands with wilderness characteristics. The commenter is referred to Section 4.5 of the Draft RMP/EIS for impacts to social and economic conditions from decisions under each alternative.

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Lands With Wilderness Characteristics	Moffat County Commissioners	A. Wilderness Study Authority Expired: The Bureau of Land Management (BLM) contends that it can identify public lands having wilderness character and revise the land use plans to protect these wilderness character areas. This position, as articulated in Colorado and Utah BLM offices, contradicts the terms of the 2003 bureau-wide settlement agreement in State of Utah v. Norton and the decision of the U.S. District Court for the District of Utah upholding the settlement agreement, in part, because it "restores the proper interpretation" of FLPMA. State of Utah v. Norton, 96CV870, p.43 (2006). The Utah settlement and the federal court decision rest on the basic concept that Congress granted BLM wilderness review authority in Section 603 of the Federal Land Policy and Management Act (FLPMA), and this authority expired in 1991, 15 years after FLPMA was enacted. Even Secretary of the Interior Babbitt agreed any wilderness study authority in Section 603 expired in 1992. State of Utah v. Babbitt, 137 F.3d 1193, 1206, n.17 (10th Cir. 1998) (citing to "Letter from Bruce Babbitt, Secretary of the Interior, to James V. Hansen, Chairman, Subcommittee on National Parks, Forests, and Public Lands 2 (July 24, 1996) ('I also agree with you that FLPMA's section 603 no longer provides authority to inventory BLM land in Utah for wilderness values.'") Because its wilderness study authority expired, BLM cannot rely on land use planning which does not authorize new wilderness protection areas. Neither Section 202, which governs land use planning nor the planning rules mention the word wilderness. The word wilderness appears only in Section 603. Other than the wilderness review authority in Section 603, wilderness designation is the exclusive province of Congress and a federal agency cannot invade the area reserved to Congress, without illegally appropriating authority to itself. Wyoming v. U.S. Dept. of Agriculture, 277 F. Supp. 2d 1197, 1234 (D. Wyo. 2003), vacated on other grounds 414 F.3d 1207 (10th Cir. 2005) (holding that the Forest Service roadless rule based on its general resource protection authority could not lawfully establish de facto wilderness). As Utah Court concluded, only Congress may designate wilderness: It makes no sense that the same Congress that jealously recognized its sole authority to declare wilderness and that set up two major laws (the Wilderness Act and FLPMA) to accomplish a properly considered exercise of that authority, would have created within one general section (section 202) of FLPMA an open-ended authority on	See General Comment Response #15

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		the part of the executive branch of government to create WSAs which, once created, result in de facto wilderness.	
Lands With Wilderness Characteristics	Moffat County Commissioners	BLM incorrectly reasons that the definition of wilderness outside of the Wilderness Act of 1964 can be relaxed and that over time, BLM can grow wilderness. Thus, areas with roads or which are much smaller than the minimum size of 5,000 acres are being identified in the land use plans as areas to be managed for wilderness protection. The ultimate test for whether an area is "wilderness" is the absence of human disturbance or activity. Roads, which necessarily facilitate human disturbance and activities, "are the coarse filter in identifying and defining wilderness." In short, it is "reasonable and supportable to equate roadless areas with the concept of wilderness." Wyoming v. U.S. Dept. of Agriculture, 277 F. Supp.2d at 1234. Moffat County has repeatedly documented that the "wilderness eligible" public lands in the Colorado Citizens Wilderness Proposal (CWP) for the Little Snake Resource Area may have some of the qualities of wilderness, such as opportunities for solitude or primitive recreation but the areas in contention lack all of the necessary qualities to meet the definition of wilderness in the Wilderness Act. BLM, therefore, misconstrues the parameters in determining which public lands may even be considered for the protection of characteristics associated with the concept of wilderness.	See General Comment Response #15
Lands With Wilderness Characteristics	Moffat County Commissioners	1. Colorado: The Draft Little Snake Assessment of Wilderness Character (Draft Assessment) and RMP classify public lands identified in the CWP as "likely" meeting wilderness character criteria of size (5,000 acres of contiguous roadless area), naturalness, and outstanding opportunities for solitude or primitive/unconfined recreation set forth in the Wilderness Act.16 U.S.C. §1131. The CWP areas proposed for wilderness protection total about 292,000 acres and include Vermillion Basin, Dinosaur Adjacents (6 units), Cold Springs Mountain, Cross Mountain, Diamond Breaks, Yampa River and Piñon Ridge, and total approximately 292,000 acres. These areas were carefully reviewed in 1978 through 1980 and found to lack wilderness due to failure to meet the 5,000 roadless acre minimum size requirement, presence of mechanically constructed roads (Cross Mountain, Diamond Breaks, Yampa River, Piñon Ridge), or evidence of development. More recent assessments recognize that these areas lack the minimum size or have roads. Nevertheless, BLM is moving forward to describe these areas as wilderness, when	See General Comment Response #15

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		they do not meet the only known definition of wilderness, and without regard to the impacts on valid existing rights, or foregone resources.	
Lands With Wilderness Characteristics	Jack Moman	People, your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands	See General Comment Response #4
Lands With Wilderness Characteristics	David & Tresa Moulton	To ensure protection of the abundant wildlife and the undeveloped landscapes of LSRA, the final RMP must include the following provisions: Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles. The Vermillion and Sand Wash Basins contain significant archeological sites that have not yet been inventoried. If they were to be destroyed by energy development or off-road vehicles, they would not be replaced.	See General Comment Response #4
Lands With Wilderness Characteristics	Mark Pearson	Vermillion Basin is unique among BLM wilderness candidates in Colorado. No other unit contains the same diverse array of landforms, wildlife resource, archeology, paleontology, and scenery. BLM's proposed plan to allow for staged surface disturbance (only 1% at any time) is just silly. In an open landscape like Vermillion, the noise, lights, and visual intrusion of oil and gas exploration and production will be visible across many thousands of acres, even if the physically disturbed amount of dirt is just a few acres. BLM needs to incorporate realistic scientific discussion about the likelihood of successful reclamation in this landscape, and conclusively demonstrate that the rolling reclamation mitigation proposed for this badlands landscape has scientific credibility.	The Draft RMP/EIS impact analysis acknowledges that even with the 1% surface disturbance limitation, oil and gas development would be a significant impact to wilderness characteristics in Vermillion Basin. The impact analysis in Section 4.3.11.2 has been updated to further disclose impacts from visual intrusion and noise, as well as reclamation issues. In addition, Alternative D of the Draft RMP/EIS for Vermillion Basin addresses managing the area for its wilderness characteristics, which includes closing the area to oil and gas leasing (See Map 2-16). Alternative C (Proposed RMP) of the Proposed RMP/Final EIS has been revised to manage Vermillion Basin for its wilderness characteristics (see Section 2.5.11.2 of the Proposed RMP/Final EIS). The 1% surface disturbance limitation is still considered as part of Alternative B to maintain consideration of this approach in the Final EIS.
Lands With Wilderness Characteristics	Teresa Pollard	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Rosemarie Quintal	The Little Snake Resource Area and its outstanding wildlands provide vital habitat to an incredible array of wildlife, including pronghorn, elk, mule deer, white-tailed prairie dogs, greater sage grouse, golden eagles and peregrine falcons. It is also home to some of our nation's most important archeological treasures, ancient	See General Comment Response #4

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		petroglyphs and pictographs.	
Lands With Wilderness Characteristics	Laura Reed-Morrisson	I oppose the idea of opening up some of our nation's most pristine wildlands to damaging oil and gas drilling and off-road vehicle traffic. Instead, the BLM should adopt a balanced approach to protect the unspoiled wildlands of northwest Colorado, including the Vermillion Basin.	See General Comment Response #4
Lands With Wilderness Characteristics	Laura Reed-Morrisson	The Little Snake Resource Area and its outstanding wildlands provide vital habitat to an incredible array of wildlife, including pronghorn, elk, mule deer, white-tailed prairie dogs, greater sage grouse, golden eagles and peregrine falcons. It is also home to some of our nation's most important archeological treasures, ancient petroglyphs and pictographs. These will be lost if over one million acres of this wild corner of the United States are opened to industrialization.	See General Comment Response #4
Lands With Wilderness Characteristics	Karen Roberts	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Jim & Liz Robinson	We commend BLM for analyzing the wilderness values of seven areas and displaying them in Map 3-27 of the draft plan. We urge that wilderness character be protected in all these units, which Representative Diana DeGette has proposed for wilderness status: Vermillion Basin, Cold Springs Mountain, Diamond Breaks, Cross Mountain, Dinosaur Adjacent, Pinyon Ridge, and Yampa River. Mineral leasing and off-road vehicles should be completely prohibited in these areas.	See General Comment Response #4
Lands With Wilderness Characteristics	Matthew Roman	All areas being considered for wilderness status should be closed to development and ORV use. I urge that wilderness status be given to all parcels under consideration.	See General Comment Response #4
Lands With Wilderness Characteristics	Ana Salinas	1) close the Vermillion Basin and other proposed wilderness lands to oil and gas drilling and off-road vehicles	See General Comment Response #4
Lands With Wilderness Characteristics	John Savlove	The Little Snake Resource Area is a fine chance for the BLM to show that it cares about putting our long term interests first. The BLM should protect this place as a precious wilderness area; it should not be opening up 93% or even 20% to exploration or use for mining, gas or other energy sources. The decision to protect the voiceless species of animals and plants that sustain our human habitat should be announced proudly as the first step in a coordinated effort by government bureaus to teach sensitivity to nature and revise the industrial infrastructure.	Only Congress can designate an area as wilderness. The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production.

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Lands With Wilderness Characteristics	Joan Schneider	Please re-set priorities for the Little Snake to make BLM's goal the preservation of the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands. I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #4
Lands With Wilderness Characteristics	Emily Seaver	Would like to see as much of Vermillion Basin protected as possible.	See General Comment Response #4
Lands With Wilderness Characteristics	John Spezia	Wilderness Status should be recognized for Vermillion Basin and those areas surrounding D.N.M. and Browns Park.	Only Congress can designate an area as wilderness. The Draft RMP/EIS evaluated a range of alternatives to assure a balanced approach was recommended that will ensure protection of resource values and resource uses while allowing opportunities for mineral exploration and production.
Lands With Wilderness Characteristics	Annie Steele	People from around the state, the region and even the world seek out northwest Colorado for outdoor recreation, wildlife viewing, solitude and natural beauty. These spectacular values will be lost if over one million acres of this wild corner of the United States are opened to industrialization. Instead, your land management plan for the Little Snake area should preserve the wilderness qualities of Vermillion Basin and all other proposed wilderness areas by prohibiting oil and gas drilling and off-road vehicle use on these lands.	See General Comment Response #4
Lands With Wilderness Characteristics	Robert Steele	Alternates C and D in the Little Snake Resource area are far too restrictive to allow the full concept of multiple use to be effective for the citizens. I object to your proposed addition of 87,000 acres of lands as having "naturalness, opportunities for semi-primitive recreation, and solitude" only benefits those who are young enough to hike into these areas. There are many existing wilderness areas for these people to enjoy.	See General Comment Response #15
Lands With Wilderness Characteristics	Ruth Stewart	The BLM should adopt Alternative D with modifications, which would offer a balanced approach to protect the unspoiled wildlands of northwest Colorado, including the Vermillion Basin, rather than the BLM's Little Snake Resource Management Plan. That plan would certainly ruin some of the most beautiful, natural wildlands to the damage of oil and gas drilling and off-road vehicle use.	See General Comment Response #4
Lands With Wilderness Characteristics	Judith Taylor	Colorado is growing in population and tourism, but not in area. With tourism, especially outdoor recreation, growing at an unmitigated rate, we need all of the wild and roadless areas we have. The BLM	See General Comment Response #4

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		proposal would limit our wilderness. We need all that we have and more. Please do not let this proposal move into action.	
Lands With Wilderness Characteristics	Noalani Terry	This area includes seven citizen-proposed wilderness areas, 275,000 acres of diverse ecosystems with unique cultural resources, whitewater rivers, rare plants, outstanding backcountry recreation opportunities and some of Colorado's most unspoiled wildlife habitat. These are the kinds of lands Colorado is known for. They need to be preserved for posterity.	See General Comment Response #4
Lands With Wilderness Characteristics	Timberline Trailriders, Inc.	“Areas with Wilderness Characteristics”: We totally object to any special management prescription for these areas. The court case settlement was clear that no new WSA were to be designated. You now propose something like a WSA-Lite for these lands which is unwarranted and perhaps illegal. A proposal from fringe extremists does not warrant a special management category. The anti-access, anti-use crowd has repeatedly caused the BLM to waste millions of dollars attempting to circumvent the original wilderness inventory, the only one authorized by Congress. To give this one-sided effort any credence whatsoever should not occur. There should be no special management prescriptions for these areas and OHV travel should be as on the majority of other BLM lands, limited to existing roads and trails. You have no authority to treat lands not officially designated as WSA as such.	See General Comment Response #15
Lands With Wilderness Characteristics	Vermillion Ranch Limited Partnership	Pg 1-9&10 Planning criteria support bullet7, oppose 19 as inconsistent with Utah v Norton	See General Comment Response #15
Lands With Wilderness Characteristics	Paul E. Weis	1. Remove all citizen proposed wilderness areas from consideration for leasing. Sixty percent of the Resource Area is already leased. That is enough. There is no need to lease Vermillion Basin, Diamond Breaks, Cold Spring Mountain, or Cross Mountain. Instead, we need to increase protections for these areas by eliminating ORV use in them and limiting ORVs to designated roads throughout the plan area.	See General Comment Response #4
Lands With Wilderness Characteristics	C. Robert Wells	I urge BLM to adopt Alternative D because it best protects the rare, precious wild lands of the Little Snake region, while allowing oil and gas development on less sensitive lands. In this alternative administrative forms of protection are used for areas with wilderness values, inasmuch as you were barred by former Secretary Norton's policies from recommending areas for wilderness status...BLM should do nothing to harm the seven areas: Vermillion Basin, Cold Springs Mountain, Diamond Breaks, Cross Mountain, Dinosaur Adjacent, Pinyon Ride, and Yampa River. Please close them to oil	See General Comment Response #4

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		and gas leasing and off-road vehicles.	
Lands With Wilderness Characteristics	Gaines Whitcomb	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	We appreciate BLM's acknowledgement of the wilderness character of the Dinosaur North and Cold Springs areas (Draft RMP, p. 2-50). However, the other areas proposed by citizen groups for wilderness do not receive adequate protection in the preferred alternative. These areas include Vermillion Basin, Cross Mountain, Yampa River, Pinyon Ridge, and Diamond Breaks. These areas are critical not only for their wilderness qualities but also the recreation opportunities they provide; for example, Diamond Breaks is home to a trophy elk hunting unit. These areas should be closed to oil and gas leasing, closed to ORVs and identified as right-of-way (ROW) exclusion zones.	Under at least one alternative in the Draft RMP/EIS, all lands outside WSA that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the opportunities for solitude and primitive recreation. Protecting the wilderness characteristics would include, among other restrictive management prescriptions, making them unavailable for oil and gas leasing and closing the area to OHV use or limiting OHV use to routes that were determined to not impact the presence of wilderness characteristics. In the Proposed RMP/Final EIS Alternative B, most of the non-WSA lands would be open to oil and gas leasing subject to standard terms and conditions, although Vermillion Basin would be managed with a 1% limit on surface disturbance. On the other hand, Alternative D is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, most non-WSA lands containing wilderness characteristics would be closed to leasing and some non-WSA lands would be open to leasing subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative A reflects existing management direction, and Alternative C (the Preferred Alternative in the Draft RMP/EIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources. It is important to note that the management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Unlike designated wilderness or WSAs, there is no statutory or policy directive requiring BLM to protect

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			the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the Draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. However, BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. Through its land use plan revision process with full public participation and to comply with the FLPMA multiple use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area. In addition, under the land use planning process, BLM must consider a range of alternatives for the lands identified with wilderness characteristics. This gives the public the ability to fully compare the consequences of protecting or not protecting the wilderness characteristics on these non-WSA lands.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	We appreciate the Little Snake Field Office's approach to inventorying for and protecting lands with wilderness characteristics. BLM's mandate of multiple use and sustained yield, as well as other relevant law and BLM's current guidance, provides for inventory and protection of wilderness values. However, we believe that the Draft RMP does not adequately consider and protect the values of these lands. A. Wilderness character is a valuable resource and important multiple use of the lands governed by the Little Snake RMP. BLM has identified "wilderness characteristics" to include naturalness or providing opportunities for solitude or primitive recreation. See, Instruction Memoranda (IMs) 2003-274 and 2003-275. These values should also be identified and protected through these planning processes. BLM should recognize the wide range of values associated with lands with wilderness character: 1. Scenic values – FLPMA specifically identifies "scenic values" as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are	The commenter has misquoted BLM's definition of wilderness characteristics. As noted in the Draft RMP/EIS glossary, it is not the mere opportunity for solitude or primitive recreation that, it is the presence of outstanding opportunities for such. Congress crafted the terms "outstanding opportunities for solitude" and "primitive or unconfined recreation" when it enacted the Wilderness Act of 1964. BLM Washington Office Instruction Memorandum 2003-275 Change 1 defines these terms for the purposes of land use planning. This distinction is important when inventorying public lands for potential wilderness characteristics. The management and level of protection of wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Unlike designated wilderness or WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. BLM recognizes that non-WSA lands with wilderness characteristics have many

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		permitted. 2. Recreation – FLPMA also identifies “outdoor recreation” as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. Most, if not all primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved. 3. Wildlife habitat and riparian areas – FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702(c). Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness-quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water). Further, inventorying lands with wilderness characteristics will also provide important data on existing large blocks of habitat and how BLM can restore these blocks of habitat to better match the historic range of variability. Swanson et al. (1994) contend that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society’s objective of sustaining habitat. Patrick Daigle and Rick Dawson, Extension Note 07; Management Concepts for Landscape Ecology (Part 1 of 7). October 1996. http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf; citing Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318. Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106.	resource values. While the values identified by the commenter may be associated with many of the non-WSA lands with wilderness characteristics, the values are not exclusively limited to these areas. Additionally, as noted in chapter 4 of the Draft RMP/EIS, not managing non-WSA lands to protect wilderness characteristics does not automatically result in the impact to or loss of such characteristics and values. Of the non-WSA lands with wilderness characteristics, only portions of Little Yampa Canyon are currently managed to protect wilderness characteristics. However, the other areas still maintain wilderness characteristics today for a variety of other reasons. Therefore, the commenter is incorrect in using fatalist statements such as “most, if not all primitive recreation experiences will be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.” The Draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed and subsequently impact by proposed management. However, BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process.

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		Identifying, restoring and protecting substantial roadless areas in the Little Snake planning area can provide crucial benefits to wildlife. 4. Cultural resources – FLPMA also recognizes the importance of "historical values" as part of the resources of the public lands to be protected. 43 U.S.C. § 1702(c). The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. As discussed in detail in the comments of the Colorado Plateau Archaeological Alliance, there are important areas of overlap between the areas identified as rich in cultural resources and those containing wilderness characteristics, underscoring the added benefits of protecting these lands. 5. Economic benefits – The recreation opportunities provided by wilderness-quality lands also yield direct economic benefits to local communities. According to the U.S. Fish & Wildlife Service, in 2001 State residents and non-residents spent $2 billion on wildlife recreation in Colorado. (USFWS 2002, National Survey of Hunting, Fishing and Wildlife-associated Recreation - http://www.census.gov/prod/2002pubs/fhw01-co.pdf). In addition, local communities that protect wildlands reap measurable benefits in terms of employment and personal income. For instance, a recent report by the Sonoran Institute (Sonoran Institute 2004, Prosperity in the 21st Century West -The Role of Protected Public Lands) found that: Protected lands have the greatest influence on economic growth in rural isolated counties that lack easy access to larger markets. From 1970 to 2000, real per capita income in isolated rural counties with protected land grew more than 60 percent faster than isolated counties without any protected lands. These findings confirm earlier research, showing that wilderness is in fact beneficial for local economies. Residents of counties with wilderness cite wilderness as an important reason why they moved to the county, and long-term residents cite it as a reason they stay. Recent survey results also indicate that many firms decide to locate or stay in the West because of scenic amenities and wildlife-based recreation, both of which are strongly supported by wilderness areas. (Morton 2000, Wilderness: The Silent Engine of the West's Economy). Other "non-market" economic values arise from the ability of wildlands to contribute to recreation and recreation-related jobs, scientific research, scenic viewsheds, biodiversity conservation, and watershed protection. (Morton 1999, The Economic Benefits of Wilderness: Theory and Practice; Loomis 2000, Economic Values of Wilderness Recreation and Passive Use:	

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		What We Think We Know at the Turn of the 21st Century). All of these economic benefits are dependent upon adequate protection of the wilderness characteristics of the lands. 6. Quality of life – The wildlands located within the Little Snake planning area help to define the character of this area and are an important component of the quality of life for local residents and future generations, providing wilderness values in proximity to burgeoning urban and suburban areas such as Steamboat Springs and Craig. Their protection enables the way of life of this community to continue. 7. Balanced use – The vast majority of BLM lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values (43 U.S.C. § 1702(c)). FLPMA also requires BLM to prepare land use plans that may limit certain uses in some areas (43 U.S.C. § 1712). Many other multiple uses of public lands are compatible with protection of wilderness characteristics – in fact, many are enhanced if not dependent on protection of wilderness qualities (such as primitive recreation and wildlife habitat). Protection of wilderness characteristics will benefit many of the other multiple uses of BLM lands, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.	
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Given the broad purpose of the preparation of the RMP revisions and the information compiled by the public regarding lands with wilderness characteristics, the range of alternatives for these lands should include alternatives to protect their wilderness values. 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).	Under at least one alternative in the Draft RMP/EIS, all lands outside WSA that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the outstanding opportunities for solitude and primitive recreation. Protecting the wilderness characteristics could include, among other restrictive management prescriptions, making them unavailable for oil and gas leasing and closing the area to OHV use or limiting OHV use to routes that were determined to not impact the presence of wilderness characteristics. In the Proposed RMP/Final EIS Alternative B, most of the non-WSA lands would be open to oil and gas leasing subject to standard terms and conditions, although Vermillion Basin would be managed with a 1% limit on surface disturbance. On the other hand, Alternative D is designed to provide

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			maximum conservation and protection of natural resources from development and use. Under Alternative C, most non-WSA lands containing wilderness characteristics would be closed to leasing and some non-WSA lands would be open to leasing subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative A reflects existing management direction, and Alternative C (the Preferred Alternative in the Draft RMP/EIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources. It is important to note that the management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Unlike designated wilderness or WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the Draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. However, BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The Utah Settlement does not affect BLM's obligation to value wilderness character or, according to BLM directives, the agency's ability to protect that character, including in the development of management alternatives. In fact, BLM has not only claimed that it can continue to protect wilderness values, but has also committed to doing so. On September 29, 2003, BLM issued IMs 2003-274 and 2003-275, formalizing its policies concerning wilderness study and consideration of wilderness characteristics in the wake of the Utah Settlement. In the IMs and subsequent public statements, BLM has claimed that its abandonment of previous policy on WSAs would not prevent protection of lands with wilderness characteristics. The IMs contemplate that BLM can continue to inventory for and protect land "with wilderness characteristics," such as naturalness or providing	BLM recognizes its authority to inventory and manage non-WSA lands with wilderness characteristics for the protection of such. BLM's authority for managing lands to protect or enhance wilderness characteristics comes directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for multiple use and sustained yield. Nothing in this section constrains the Secretary's authority to manage lands as necessary to "achieve integrated consideration of physical, biological, economic, and other sciences." (FLPMA, Section 202(c)(2) (43 U.S.C. §1712(c)(2)).)

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		opportunities for solitude or primitive recreation, through the planning process. The IMs further provide for management that emphasizes “the protection of some or all of the wilderness characteristics as a priority,” even if this means prioritizing wilderness over other multiple uses. This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5,000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. IM 2003-274 states that “BLM may continue to inventory public lands for resource or other values, including wilderness characteristics” and that the agency can “manage them using special protections to protect wilderness characteristics.” Accordingly, administrative protections can and should be considered for lands not currently protected. Courts have confirmed the BLM’s obligations to consider the value of wilderness characteristics and the potential impacts of decisions on this resource when making land use planning decisions. BLM is...obligated to both consider additions to wilderness values and evaluate the potential impacts on those wilderness values from its management decisions.	FLPMA intended for the Secretary of the Interior to use land use planning as a mechanism for allocating resource use, including wilderness character management, amongst the various resources in a way that provides uses for current and future generations. In addition, BLM’s Land Use Planning Handbook (H-1601-1) directs BLM to “identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation). Include goals and objectives to protect the resource and management actions necessary to achieve these goals and objectives. For authorized activities, include conditions of use that would avoid or minimize impacts to wilderness characteristics.” In line with this understanding of policy related to non-WSA lands with wilderness characteristics, under at least one alternative in the Draft RMP/EIS, all lands outside WSA that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the outstanding opportunities for solitude and primitive recreation. The Draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed and subsequently impact by proposed management.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The Little Snake Field Office can and should protect lands with wilderness characteristics from the damage likely to result from oil and gas development and uncontrolled ORV use, both of which the BLM has acknowledged are likely to occur if these activities are permitted to occur on lands with wilderness characteristics. In addition, the information submitted regarding citizen-proposed wilderness constitutes significant new information that must be addressed in this RMP revision. This information has not yet been analyzed in the existing land use plan, so NEPA requires analysis of the potential environmental direct, indirect and cumulative effects of oil and gas development on these areas and consideration of protection for them.	Information submitted regarding citizen-proposed wilderness is addressed in chapter 3 of the Draft RMP/EIS. BLM has reviewed all public submissions and evaluated whether the information is new and accurate. As part of BLM’s wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution aerial photographs. BLM's findings are contained in chapter 3 of the Draft RMP/EIS, Section 3.1.12.2. All areas identified by BLM as having wilderness characteristics were considered in the Draft RMP/EIS, including management for these areas

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			and impacts from each of the alternatives. Under at least one alternative in the Draft RMP/EIS, all lands outside WSA that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the opportunities for solitude and primitive recreation. Protecting the wilderness characteristics could include, among other restrictive management prescriptions, making them unavailable for oil and gas leasing and closing the area to OHV use or limiting OHV use to routes that were determined to not impact the presence of wilderness characteristics. In the Proposed RMP/Final EIS Alternative B, most of the non-WSA lands would be open to oil and gas leasing subject to standard terms and conditions, although Vermillion Basin would be managed with a 1% limit on surface disturbance. On the other hand, Alternative D is designed to provide maximum conservation and protection of natural resources from development and use, and all citizen wilderness proposed lands, regardless of whether BLM agrees they contain wilderness characteristics, are closed to oil and gas leasing and OHV use. Under Alternative C, most non-WSA lands containing wilderness characteristics would be closed to leasing and some non-WSA lands would be open to leasing subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative A reflects existing management direction, and Alternative C (the Preferred Alternative in the Draft RMP/EIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	BLM is obligated to include protection of lands with wilderness characteristics in management alternatives and to ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the RMP, including by: inventorying for lands with wilderness characteristics (including those lands identified in the Citizens' Wilderness Proposal); considering alternatives for protecting lands with wilderness characteristics (including for those lands currently designated as	BLM has reviewed all public submissions and evaluated whether the information is new and accurate. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections, interdisciplinary team review of data such as range files, County and BLM GIS data, and high-resolution aerial

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		WSAs if they are not ultimately designated as Wilderness by Congress); and addressing wilderness characteristics as a separate and unique issue in the planning process in each section of the RMP.	photographs. BLM's findings are contained in chapter 3 of the Draft RMP/EIS, Section 3.1.12.2. All areas identified by BLM as having wilderness characteristics were considered in the Draft RMP/EIS, including management for these areas and impacts from each of the alternatives. Under at least one alternative in the Draft RMP/EIS, all lands outside WSA that were identified by BLM as having wilderness characteristics would be managed to protect the naturalness of the areas and the opportunities for solitude and primitive recreation. In the Proposed RMP/Final EIS Alternative B, most of the non-WSA lands would be open to oil and gas leasing subject to standard terms and conditions, although Vermillion Basin would be managed with a 1% limit on surface disturbance. On the other hand, Alternative D is designed to provide maximum conservation and protection of natural resources from development and use. Under Alternative C, most non-WSA lands containing wilderness characteristics would be closed to leasing and some non-WSA lands would be open to leasing subject to either minor constraints like timing limitations or controls on surface use or major constraints like no surface occupancy. Alternative A reflects existing management direction, and Alternative C (the Preferred Alternative in the Draft RMP/EIS) is designed to provide for a wide variety of resource needs, including mineral resource development and some level of protection of natural resources.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	We would note that the agency's current standards for identifying and managing lands with wilderness characteristics are less stringent than those applicable under the Wilderness Act and under the now-revoked Wilderness Inventory Handbook. For instance, the national guidance provides for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority" over other multiple uses. (emphasis added). This guidance does not limit its application to lands suitable for designation of WSAs; for instance, the guidance does not include a requirement for the lands at issue to generally comprise 5,000-acre parcels or a requirement that the lands have all of the potential wilderness characteristics in order to merit protection. For this reason, we take issue with the agency's assessment of "areas likely to have	The commenter is correct in noting that there is no existing requirement for lands with wilderness characteristics to be comprised of 5,000 acres. Table 3-25 has been updated in the Proposed RMP/EIS to reflect this.

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		wilderness characteristics" where it relies upon a size determination of greater than 5,000 acres. Draft RMP, Table 3-25, p. 3-86. Not only does current guidance omit the requirement, but also the Wilderness Act provides for designation of areas that are 5,000 acres or "of sufficient size as to make practicable its preservation and use in an unimpaired condition." 16 U.S.C. § 1131(c). As shown in the repeated submissions of the Citizens' Wilderness Proposal, these lands have wilderness characteristics.	
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The Citizens' Wilderness Proposal identifies lands with wilderness characteristics, inventoried in accordance with the more stringent standards of the Wilderness Act and the Wilderness Inventory Handbook. The CWP was first published in 1994 by a coalition of 47 groups and has been updated based on ongoing inventories as new information becomes available, including the attached information, which includes the most recent data regarding the CWP units in the Little Snake planning area, as well as GIS files depicting each area. The Little Snake RMP should acknowledge the wilderness characteristics of the areas included in this proposal and manage these areas to protect their wilderness characteristics.	While FLPMA requires BLM maintain inventories of resources on public lands, this does not include tacitly accepting inventories from outside special interest organizations. BLM has reviewed all public submissions and evaluated whether the information is new and accurate. As part of BLM's wilderness characteristics inventory maintenance, BLM performed a combination of data and on-site reviews. This included specific field inspections where necessary, interdisciplinary team reviews of data such as range files, and County and BLM GIS data. BLM's findings are contained in chapter 3 of the Draft RMP/EIS, Section 3.1.12.2 and in the Administrative Record. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings, which involved wilderness characteristics inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Vermillion Basin: In the preferred alternative, the entirety of Vermillion Basin is open to oil and gas development. The Draft RMP recognizes the important natural values and opportunities for solitude and primitive, non-motorized recreation provided by this area (including Vermillion Basin in the category of lands with wilderness characteristics outside existing WSAs in the preferred alternative (Draft RMP, p. 2-47) and as a primitive Special Recreation Management Area in Alternative D (Draft RMP, p. 2-93)), but then utterly fails to protect it any meaningful way. The preferred alternative proposes to manage oil and gas development in Vermillion Basin by limiting surface disturbance to one percent (1%) of the unit at any one time. Draft RMP, p. 2-48. However, existing disturbance is not included. Id. These units of leases are composed of not only areas that are intended or expected to be developed, but also can include a "mitigation area" that an operator never intends to develop but merely allows the operator to increase the total acreage of surface disturbed in areas	Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance. As noted on Draft RMP/EIS Map 3-30, there are no existing leases in Vermillion Basin. Additionally, as noted on Maps 3-39 and 3-41 there are not a large number of routes, a fact noted by the commenter in previous comments due to nomination of the area as having wilderness characteristics. There is essentially no existing oil and gas disturbance attributable to oil and gas activities to include in the 1% ceiling. As such, excluding existing disturbance in the 1% ceiling on surface disturbance for Vermillion Basin would not result in the addition of

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		of development. Id. The mitigation areas do not need to be adjacent to the area under exploration or development. Id. Further, all of Vermillion Basin will be made available for leasing at the same time. Id. This approach creates an obvious incentive for operators to purchase leases in areas of low potential (areas that might otherwise not be attractive for leasing), so that they can more intensively develop a smaller area. The management approach does not include any requirement to limit surface disturbance to any specific road density or any other limits, so there are no controls on the amount of damage that can occur.	a significant amount of disturbance to potential cumulative disturbances. In addition, the commenter recognizes that the Draft RMP/EIS notes that "all of Vermillion Basin would be offered for a lease simultaneously" (page 2-48). With the entire Vermillion Basin leased, only 1% would be allowed to be disturbed at any one time, with the caveat that the required Plan of Development would include a "strategy for limiting surface disturbance and impacts on natural values of the area" (Draft RMP/EIS pages 2-48 and 2-49).The commenter is incorrect concerning the claim that "there are no controls on the amount of damage that can occur." As noted above, prior to any development being approved, there must be an approved Plan of Development in place that, among other requirements for mitigation, includes a strategy for limiting surface disturbance. This approach would allow oil and gas development in Vermillion Basin to be planned as an entire unit, including mitigations to ensure that the surface disturbance on 1% of the area is performed in a manner that allows for coordinated and organized oil and gas development while protecting natural and scenic values.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The Draft RMP claims that this management approach will provide "greater protections" to Vermillion Basin's wilderness characteristics. Draft RMP, p. 4-126. However, the Draft RMP also acknowledges that "oil and gas development would result in a significant impact to wilderness characteristics." Id. The discussion in the Draft RMP of likely impacts from oil and gas development on Vermillion Basin does not specifically discuss or acknowledge the foreseeable extent of impacts of leasing areas with low potential, such as the more intensive development of certain areas. The amount of damage may also be increased by the failure of the surface disturbance limits to take into account existing disturbance. Ignoring these impacts contradicts NEPA's requirement to take into account all of the direct, indirect and cumulative impacts of a proposed action.	The use of the term "greater protections" is in relation to the protections afforded Vermillion Basin under Alternative A. Under Alternative A, Vermillion Basin would be largely open to leasing with standard lease terms and conditions, with a few areas containing seasonal and CSU stipulations and a few areas containing NSO stipulations (see Draft RMP/EIS Map 2-14). With the changes made in management in the Proposed RMP/Final EIS, the entire Vermillion Basin would have a 1% ceiling on surface disturbance from oil and gas development under Alternative B, combined with areas containing seasonal and NSO stipulations and some areas being closed to leasing (see Proposed RMP/Final EIS Map 2-14). Therefore, the analysis is accurate in identifying greater protections under Alternative B. In addition, the impact analysis for Vermillion Basin has been revised to provide more detail of the impacts from oil and gas development. Concerning not including

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			existing disturbance, there are no existing leases in Vermillion Basin and there are not a large number of routes, a fact noted by the commenter in previous comments due to nomination of the area as having wilderness characteristics. There is essentially no existing oil and gas disturbance attributable to oil and gas activities to include in the 1% ceiling. As such, excluding existing disturbance in the 1% ceiling on surface disturbance for Vermillion Basin would not result in the addition of a significant amount of disturbance to potential cumulative disturbances. Finally, it is important to note that not including existing disturbance in the 1% ceiling for surface disturbance does not mean BLM ignores the presence of such impacts. Chapter 4 of the Draft RMP/EIS notes impacts from OHV use on wilderness characteristics. Therefore, NEPA's requirements of addressing the impacts from existing disturbances have been met. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Another likely impact of the approach to managing oil and gas development in Vermillion Basin is to limit the likelihood that it can be managed for other multiple uses, because the approach incentivizes leasing of all the area at the same time and, once an area is leased, the BLM has reduced options for restricting activities on the lease. See, e.g., 43 C.F.R. § 3101.1-2. As a result, the preferred alternative undermines BLM's compliance with the multiple use mandate of FLPMA.	While the commenter is accurate in that when a lease if offered there are certain rights associated with it, those rights are constrained by the stipulations associated with the lease. This is identified in the CFR section quoted by the commenter as the first item to which a lessee is subject to ("stipulations attached to the lease"). While additional stipulations may not be able to be added (beyond "such reasonable measures as may be required by the authorized officer to minimize adverse impacts to other resource values" as described in 43 C.F.R. § 3101.1-2), the leaseholder must abide by the terms associated with the lease. In the case of leases in Vermillion Basin under Alternative B (Proposed RMP/Final EIS), that means limiting surface disturbance to 1% of leased area,

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			abiding by an approved Plan of Development place that, among other requirements for mitigation, includes a strategy for limiting surface disturbance, and all other surface protections stipulations. By using the commenter's logic, any time BLM offers an oil and gas lease they change the leased lands from multiple use to singular use and defy FLPMA. This is not the case, as FLPMA declares that is the policy of the United States that "the public lands be managed in a manner which recognizes the Nation's need for domestic minerals" and specifically mentions the Mining and Minerals Policy Act of 1970 (FLPMA Sec 102 (a)). As such, the preferred alternative does not undermine BLM compliance with the multiple use mandate of FLPMA. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	BLM's conclusions that this approach will provide protections to the wilderness values of Vermillion Basin are also not supported. In order for BLM to rely on mitigation, such as this approach, NEPA requires that BLM make a firm commitment to the mitigation and discuss the mitigation measures "in sufficient detail to ensure that environmental consequences have been fairly evaluated…" Communities, Inc. v. Busey, 956 F.2d 619, 626 (6th Cir. 1992). NEPA defines "mitigation" of impacts (at 40 C.F.R. § 1508.20) to include: • Avoiding the impact altogether by not taking a certain action or parts of an action; • Minimizing impacts by limiting the degree or magnitude of the action and its implementation; • Rectifying the impact by repairing, rehabilitating, or restoring the affected environment; • Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or • Compensating for the impact by replacing or providing substitute resources or environments. Simply identifying mitigation measures, without analyzing the effectiveness of the measures violates NEPA. Agencies must "analyze the mitigation measures in detail [and] explain how	Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B was also revised to include the 1% limit on surface disturbance. The commenter correctly points out the NEPA definition of mitigation. Under this definition, limiting surface disturbance from oil and gas development to no more than 1% definitely is considered "minimizing impacts by limiting the degree or magnitude of the action," which in this case is the potential for oil and gas leasing and subsequent development in Vermillion Basin. Compared to Alternative A, Alternative B, with the 1% disturbance cap and required POD implemented as mitigation, definitely reduces the potential for impacts to a variety of resources, including wilderness characteristics, within Vermillion Basin. In addition, a 1% disturbance cap would require reclamation before new disturbance is initiated, which aligns exactly with the third bullet of "repairing, rehabilitating, or restoring the affected environment." Therefore, the management presented in Proposed RMP/Final EIS

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		effective the measures would be…A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA." Northwest Indian Cemetery Protective Association v. Peterson, 764 F.2d 581, 588 (9th Cir. 1985), rev'd on other grounds 485 U.S. 439 (1988). NEPA also directs that the "possibility of mitigation" should not be relied upon as a means to avoid further environmental analysis. Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations; Davis v. Mineta, 302 F.3d 1104,1125 (10th Cir. 2002). The Draft RMP does not provide sufficient detail regarding how the 1% disturbance cap will be measured, monitored or enforced, so it cannot rely upon this as a mitigation measure for the expected significant impacts. Similarly, there is not sufficient support for concluding that rolling reclamation will be successful in restoring the wilderness values of Vermillion Basin. In fact, the actual reclamation standards set out in Appendix O do not require actual establishment of native vegetation. Instead, Appendix O provides that if vegetation is not successfully re-established after 2 growing seasons, then if erosion is greater than 2 times allowable, some type of "corrective action" would be required of the "responsible company," but no additional detail is provided as to what this action might be. If erosion is at or below the set erosion threshold and the BLM determines that the site may become stable, then no corrective action would be required and, if this holds for another season, then the standard is considered met. So, essentially, the reclamation standard may be no more than erosion measurements. A "stable" site is not equivalent to a restored site, but, under the preferred alternative, it can be sufficient to permit additional destruction of Vermillion Basin.	Alternative B meets NEPA's definition of mitigation. The impacts from the proposed mitigation/lease stipulations under Alternative are discussed in chapter 4. Additional detail has been added to the Proposed RMP/Final EIS to further clarify these impacts to wilderness characteristics. The other point raised by the commenter is that the RMP fails to provide sufficient detail regarding how the mitigation measure would be implemented. Chapter 2 specifically notes that all leases offered in Vermillion Basin would be allowed to disturb no more than 1% of the surface area at one given time. The Draft RMP/EIS chapter 2 (pages 2-47 through 2-50, which is now associated with Alternative B) lays out specific detail on the requirements that would be associated with each lease. Additionally, Draft RMP/EIS Appendix O details the surface reclamation performance standard that must be met before acreage would be released from counting against the 1%. Based on public comments, more detail has been added to Appendix O. Combined, these portions of the Draft RMP/EIS outline specifically the requirements with which potential leaseholders would be required to comply. Additionally, a general discussion of monitoring and compliance of the 1% limitation was added in the Proposed RMP/Final EIS. However, it is important to note that at the RMP decision-making level, decisions are limited to those that apply to the oil and gas leasing stage. Additional site specific details would be applied at subsequent levels of decision-making and the associated NEPA. Specific monitoring methodology and schedules and enforcement of RMP decisions are not RMP-level decisions. These vary based on annual budgets and available staffing, as well as needs of site-specific developments, determined on a case-by-case basis as part of the POD. Concerning the reclamation standards in Appendix O, the Draft RMP/EIS never claimed that the reclamation would restore wilderness values and insinuated by the commenter, but that it would reclaim surface disturbance. Additionally, the presence of non-native vegetation is not part of the Congressional definition for wilderness

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			characteristics and used by BLM in reviewing lands for this RMP/EIS effort. While native vegetation is preferred, there are site-specific scenarios where the use of non-native vegetation may be beneficial in reclamation efforts and the reduction of soil loss. Again, based on public comments, reclamation standards in Appendix O have been revised to include more specific measures for a successfully reclaimed site.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Currently, Vermillion Basin is the largest, contiguous block of unleased land within the Little Snake Field Office. Further, over 1 million acres in the planning area are already leased. If the Vermillion Basin area is entirely leased and the northern portion intensively developed, as can be expected based on the management approach in the preferred alternative, then the BLM will lose the opportunity to protect the area's natural character. Further, given the lack of similarly large unleased areas in the Little Snake Resource Area and in the adjacent Field Offices, losing the opportunity to protect Vermillion Basin will foreclose an important management alternative and lead to a greater cumulative loss of wilderness values. In addition to the substantial development predicted in the Draft RMP, significant oil and gas development is proceeding in the surrounding areas, including an additional 4,200 proposed gas wells in the Hiawatha area, spanning the Wyoming-Colorado border into the Little Snake Resource Area. Intensive development is ongoing and more is planned in the Piceance Basin: approval of 15,000 or more wells is under consideration in the Amendment of the White River RMP; in the interim, the White River Field Office has approved more than 1000 additional wells in Exxon's Piceance Development Project; the Kremmling and Glenwood Springs RMPs are being revised and one of the goals is to improve access for oil and gas development, although 540,000 acres are already under lease; and the adjacent Rawlins Field Office in Wyoming is revising its RMP with a projection of approving 8822 wells, while the Desolation Flats, Continental-Creston, and Atlantic Rim projects approved or in the process of being approved by this Field Office provide for 11,335 wells. The Draft RMP fails to give adequate weight to the benefits of preserving Vermillion Basin and the consequences to permitting development in the context of the regional landscape.	Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B was also revised to include the 1% limit on surface disturbance. Regardless of how much of Vermillion Basin is leased, the most intense oil and gas development would still be limited to disturbing no more than 1% of the area. While 770 acres of surface disturbance will have an impact on wilderness characteristics, as described in the Draft RMP/EIS and further explained in the Proposed RMP/Final EIS, it would not result in the loss of opportunity to protect the entire basin's natural character. It is important to note that the Draft RMP/EIS Alternative D did consider closing the entire Vermillion Basin to oil and gas leasing. The decision-making process has included a range of development scenarios, from few limitations (Proposed RMP/Final EIS Alternative A) to absolutely no drilling (Proposed RMP/Final EIS Alternatives C and D), and Proposed RMP/Final EIS Alternative B which allows for some development with strict controls on the amount of allowable disturbance. Concerning the predicted development, the reasonably foreseeable development scenario for oil and gas encompasses the wells associated with the Hiawatha area in the total wells for each alternative under the Draft RMP/EIS. Therefore, those wells are not considered in the cumulative impacts section, but as part of the actual analysis in the Draft RMP/EIS chapter 4. Concerning cumulative impacts and considering consequences of additional drilling in the regional landscape, the commenter

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			does not provide any detail of how impacts from adding 770 acres of oil and gas disturbance in Vermillion Basin could cumulatively affect any resources in the Little Snake Field Office when combined with the claimed development estimates. Lacking any such detail, there is no evidence to be added to the Draft RMP/EIS that supports the commenter's claim that resources require additional protection other than the commenter's desire to see less oil and gas development. BLM follows NEPA and FLPMA guidance when making decisions, among other laws, regulations and policies. As noted above, the Draft RMP/EIS considers a broad range of alternatives regarding oil and gas leasing in Vermillion Basin, and the commenter's opinion has been noted.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The cultural resources and wilderness qualities of Vermillion Basin are extremely valuable and also extremely vulnerable. The importance of protecting these resources is heightened by the fact that they are already rare in this region and cannot be replaced once they are destroyed. There is an unquestioned and substantial benefit from protecting these resources, which the BLM must take into account. In addition, the potential benefits from oil and gas development in Vermillion Basin are relatively insignificant. An analysis prepared by The Wilderness Society (A GIS Analysis of the Undiscovered Technically Recoverable Oil and Gas in the Little Snake Resource Area – attached) found that the Vermillion Basin CWP area contains only enough technically recoverable gas to supply U.S. energy needs for about 10 days, and less than 8 minutes' worth of oil. The high costs of sacrificing the important cultural resources and wilderness qualities of Vermillion Basin cannot be justified for this limited benefit.	NEPA does not require a comparative analysis of monetary values associated with each alternative. While monetary value can be considered for some resources, such as oil and gas, the accuracy and availability of monetary valuations of non-market resources such as cultural and wilderness values is limited. As required by NEPA, the Draft RMP/EIS presented a range of alternatives and notes the impacts to cultural resources and wilderness characteristics from those alternatives, including for oil and gas development in Vermillion Basin, as well as impacts to other resources/uses/socioeconomics. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B was also revised to include the 1% limit on surface disturbance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The preferred alternative also prescribes Visual Resource Management (VRM) Class III management for Vermillion Basin, but VRM Class I is more suitable protection for the naturalness and other wilderness values of Vermillion Basin. The objective of VRM Class III is "to partially retain the existing character of the landscape." Management is so that "the level of change to the characteristic landscape should be moderate." In contrast, the object of VRM Class I is "to preserve the existing character of the landscape" and management is so that the "level of change to the	Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics. To support this objective, Vermillion Basin would be closed to oil and gas leasing, mineral material sales and nonenergy leasables, and would not be available for coal leasing. Vermillion Basin would also be a ROW exclusion area. Under this revised approach, VRM Class I designation would not be necessary to

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		characteristic landscape should be very low and must not attract attention" See, BLM official Visual Resource Management information website at: http://www.blm.gov/nstc/VRM/vrmsys.html. This is insufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate.	protect wilderness characteristics within Vermillion Basin. The area would have a Class II VRM designation, because with the amount of stipulations on other activities, a VRM objective to "retain the existing characteristics of the landscape" would be sufficient to protect the naturalness an outstanding opportunities for primitive recreation and solitude within the Basin, which meets the RMP's stated objective for this area. The commenter fails to provide any analysis or evidence that VRM Class I would be necessary to protect the naturalness of this area given the other restrictive prescriptions.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The wilderness values and appropriate boundaries for management of Vermillion Basin's wilderness characteristics are described in further detail in the attached submission of the updated CWP inventory information. The area identified as Vermillion Basin in the Draft RMP is not equivalent to the more than 86,560 acres identified in the CWP and shown to have wilderness characteristics. Accordingly, the larger area identified in the attached inventory should be included in the lands with wilderness characteristics managed as part of Vermillion Basin in the RMP.	As part of BLM's wilderness characteristics inventory maintenance for Vermillion Basin, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the commenter. No new information was submitted that either has not already been considered in BLM's wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved wilderness characteristics inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Dinosaur North: We support the management of this area as "lands with wilderness characteristics outside WSAs," including the closure to oil and gas operations and other minerals activities, no wind energy development and exclusion of rights-of-way (ROWs). However, we also believe that closure to ORVs is appropriate to protect the area's wilderness characteristics. As discussed in the comments of the Colorado Plateau Archaeological Alliance, the roadless character of the Dinosaur North area is likely a key reason that the cultural resources in the area have remained intact. The RMP should prioritize closure and restoration, so that no new routes are created and that closures and restoration activities that will enhance the area's wilderness characteristics are not delayed.	Closing the area to OHV use was considered in the Draft RMP/EIS under Alternative D. The commenter's preference for Alternative D has been noted. Under Alternative C the Dinosaur North area would be manage to "protect naturalness, and outstanding opportunities for primitive recreation and solitude." No route designations are proposed in the Draft or Final EISs. During subsequent transportation planning processes to identify designated routes, BLM would consider effects OHV use would have on wilderness characteristics. The Proposed RMP/Final EIS chapter 4 has been revised to include additional detail on impacts to non-WSA lands with wilderness characteristics from OHV use. Based on that additional detail, wilderness characteristics can be maintained in the presence of temporary OHV use along existing routes whose surface disturbance was

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			reviewed and determined to be substantially un-noticeable in the wilderness characteristics inventory. The objective to protect the wilderness characteristics would have to be considered in any future route designations. Impacts to cultural resources from OHV use along designated routes can be found in the Draft RMP/EIS Section 4.3.9.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Dinosaur North: We refer you to the attached submission of the updated CWP inventory information, identifying this area as Dinosaur Additions, for additional information. We also note that the acreage depicted as “Dinosaur Additions” in Map 3-27 (Citizen’s [sic] Wilderness Proposal Areas) and “Dinosaur North” in Map 2-37 (Special Recreation Management Area Designations – Alternative D) are inaccurate. Also, the area identified as Dinosaur North in the Draft RMP should be managed to protect its wilderness values based on the boundaries identified collectively as Dinosaur Additions in the attached CWP inventory and shown to have wilderness characteristics.	The areas depicted in maps mentioned by the commenter were either based on the CWP information BLM had at the time the planning process was initiated, or the areas which BLM determined to contain wilderness characteristics. In the case of the Dinosaur Additions, the area BLM determined to contain wilderness characteristics was larger (it included the Happy Hollow area) than the CWP area at the time. As part of BLM’s wilderness characteristics inventory maintenance for the Dinosaur North area, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the commenter. No new information was submitted that either has not already been considered in BLM’s wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved wilderness characteristics inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Dinosaur North: Further, this area should be managed as VRM Class I instead of the VRM Class II proposed in the Draft RMP. The objective of VRM Class II is “to retain the existing character of the landscape” and management is such that the “level of change to the characteristic landscape should be low.” The objective of VRM Class I is “to preserve the existing character of the landscape” and management is so that the “level of change to the characteristic landscape should be very low and must not attract attention.” VRM Class II is not sufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate.	Based on other management decisions in the Preferred Alternative (Alternative C) that restrict visually obtrusive surface disturbing activities in this area, a more restrictive VRM Class was not deemed necessary to protect the area’s visual resources. The commenter fails to provide any analysis or evidence that VRM Class II would not be sufficient to protect the naturalness of this area given the other restrictive prescriptions.
Lands With Wilderness	Wilderness Society (The),	Cold Springs Mountain (outside WSA): We support the management of this area as lands with wilderness characteristics outside WSAs, including the closure to oil and gas operations and other minerals	The management supported by the commenter were considered and analyzed in Alternative D. The commenter’s preference for Alternative D has been

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Characteristics	et. al.	activities, no wind energy development and exclusion of ROWs. However, we also believe that closure to ORVs is appropriate to protect the area's wilderness characteristics. As discussed in the comments of the Colorado Plateau Archaeological Alliance, the roadless character of the Cold Springs Mountain area is likely a key reason that the cultural resources in the area have remained intact. The RMP should prioritize closure and restoration, so that no new routes are created and that closures and restoration activities that will enhance the area's wilderness characteristics are not delayed.	noted. Under Alternative C the Cold Spring Mountain area would be manage to "protect naturalness, and outstanding opportunities for primitive recreation and solitude." No route designations are proposed in the Draft or Final EIS. During subsequent transportation planning processes to identify designated routes, BLM would consider effects OHV use would have on wilderness characteristics. The Proposed RMP/Final EIS chapter 4 has been revised to include additional detail on impacts to non-WSA lands with wilderness characteristics from OHV use. Based on that additional detail, wilderness characteristics can be maintained in the presence of temporary OHV use along existing routes whose surface disturbance was reviewed and determined to be substantially un-noticeable in the wilderness characteristics inventory. The objective to protect the wilderness characteristics would have to be considered in any future route designations. Impacts to cultural resources from OHV use along designated routes can be found in the Draft RMP/EIS Section 4.3.9.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Cold Springs Mountain (outside WSA): this area should be managed as VRM Class I instead of the VRM Class III proposed in the Draft RMP. The objective of VRM Class III is "to partially retain the existing character of the landscape." Management is so that "the level of change to the characteristic landscape should be moderate." See, BLM official Visual Resource Management information website at: http://www.blm.gov/nstc/VRM/vrmsys.html. This is insufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate. The objective of VRM Class I is "to preserve the existing character of the landscape" and management is so that the "level of change to the characteristic landscape should be very low and must not attract attention."	Based on other management decisions in the Preferred Alternative (Alternative C) that restrict most visually obtrusive surface disturbing activities in this area, a more restrictive VRM Class was not deemed necessary to protect the area's visual resources. However, because a part of this area has outstanding potential for wind energy, and the extent of such areas is very limited in the RMPPA, applications for wind energy development would be accepted on a case-by-case basis. In order to allow the possibility of such development, the VRM was set at Class III. Because the objective for this area is primarily the protection of wilderness characteristics, future actions would still need to consider and reduce to the degree possible impacts to those characteristics.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Cold Springs Mountain (outside WSA): We refer you to the attached submission of the updated CWP inventory information for additional information. Also, the area identified as Cold Springs Mountain in the Draft RMP is not equivalent to the area identified in the CWP and shown to have wilderness characteristics. Accordingly, the	As part of BLM's wilderness characteristics inventory maintenance for the Cold Spring Mountain area, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the

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		larger area depicted on the attached CWP inventory should be included in the lands with wilderness characteristics managed as part of Cold Springs Mountain in the RMP.	commenter. No new information was submitted that either has not already been considered in BLM's wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved wilderness characteristics inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Yampa River: We take issue with the conclusion in the BLM's assessment of the Yampa River unit that it does not meet the "size criterion" because it does not incorporate more than 5,000 contiguous acres. Draft RMP, Table 3-25, p. 3-86. As shown in the CWP inventory, the area with wilderness characteristics is in excess of 12,000 contiguous areas. Also, as discussed above, under BLM's current guidance, there is no "criterion" for areas to be comprised of more than 5,000 contiguous acres. The Wilderness Act also provides for designation and management of smaller areas, so long as they are "of sufficient size as to make practicable its preservation and use in an unimpaired condition." 16 U.S.C. § 1131(c). The BLM's conclusion should be corrected.	The use of size was not intended to be included in Draft RMP/EIS table 3-25. However, these areas were determined to not meet the wilderness characteristics criteria for naturalness. This editing error was corrected in the Proposed RMP/Final EIS.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Yampa River: We refer you to the attached submission of the updated CWP inventory information for additional information. Also, based on the information included in the attached CWP inventory, the area to be managed in this SRMA should also include Duffy Mountain, where a road closure and restoration can be prioritized to create a larger primitive SRMA and provide enhanced recreational experiences. The areas identified in the CWP inventory as Yampa River, as well as Duffy Mountain, should be managed as a primitive SRMA in the RMP. To the extent that BLM prefers to link the area to the greater Little Yampa/Juniper Canyon SRMA, the primitive, non-motorized Yampa River SRMA must be clearly identified on maps and in the RMP.	As part of BLM's wilderness characteristics inventory maintenance for the Yampa River area, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the commenter. No new information was submitted that either has not already been considered in BLM's wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. It is also important to note that the wilderness inventory is performed based on the existing condition of the area, not on the condition of the area if any number of potential management actions were implemented, such as closing and rehabilitating a road. While such areas may be identified and considered in the review process, they would not be considered to contain wilderness characteristics in their inventoried state. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved wilderness characteristics

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			inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Diamond Breaks (outside WSA): this area should be managed as VRM Class I instead of the VRM Class III proposed in the Draft RMP. The objective of VRM class III is “to partially retain the existing character of the landscape.” Management is so that “the level of change to the characteristic landscape should be moderate.” This is insufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate. In addition, the area should be classified as an exclusion (not just avoidance) area for ROWs.	Commenter is incorrect in stating that the Diamond Breaks area outside the WSA would be managed for naturalness. The Draft RMP/EIS Alternative D notes that this area would be administered “to provide a recreation experience in predominantly natural settings” (Draft RMP/EIS page 2-95). Under Alternative D this area was already proposed to be an exclusion area for ROWs as the commenter suggests. Concerning the VRM designation, the Draft RMP/EIS chapter 2 narrative incorrectly noted this area was to be designated as VRM Class III. However, the Draft RMP/EIS maps and impact analysis accurately identify this area as VRM Class II. This inconsistency has been corrected in the Proposed RMP/Final EIS. Based on other management decisions in Alternative D that restrict visually obtrusive surface disturbing activities in this area, VRM Class I was not deemed necessary to protect the area’s visual resources. The commenter fails to provide any analysis or evidence that VRM Class I would be necessary to protect the naturalness of this area given the other restrictive prescriptions.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Diamond Breaks (outside WSA): We also take issue with the conclusion in the BLM’s assessment of Diamond Breaks that it does not have sufficient “naturalness.” Draft RMP, Table 3-25, p. 3-86. As discussed in detail in the CWP submission, this area is in a natural state. Although the CWP lands outside the WSA at the base of Chokecherry and Yellow Jacket Draws have seen a few human disturbances, these disturbances do not impact the naturalness of the lands. The area includes a few ways and some vegetation treatments which have removed some of the sagebrush. While the impacts from these disturbances can be seen from some parts of the area, they are well screened by vegetation and topography, making their impacts minor and hardly noticeable. Furthermore, similar ways have been included in existing wilderness such as the Black Ridge Canyons Wilderness near Grand Junction. Finally, the Wilderness Act allows for reclamation of such impacts through both natural and agency means. The BLM has no excuse for not managing these lands to protect their Wilderness Characteristics. The BLM’s conclusion should be corrected.	BLM disagrees with the commenter’s claim that the area is in a natural state and that the disturbances do not impact the naturalness of the lands. The impacts within the area have resulted in a cumulative effect on the area’s naturalness, removing it from meeting the naturalness criteria for wilderness characteristics. The commenter notes this is the case by describing the impacts as “minor and hardly noticeable.” However, this use of words supports BLM’s conclusions that they are noticeable and therefore display appears to be trammeled by man and his activities. Additionally, the presence of disturbances in other designated wilderness was not the standard used to inventory wilderness characteristics within the RMPPA. Through formal designation, Congress can make any number of exceptions, such as the inclusion of maintained backcountry airstrips or functioning pipelines for hydro-power generation.

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		We refer you to the attached submission of the updated CWP inventory information for additional information regarding the wilderness values and boundaries of the Diamond Breaks unit. The Diamond Breaks area, as identified in the CWP inventory and/or under BLM's jurisdiction, should be managed as lands with backcountry characteristics in the RMP.	Through the inventory process BLM used these lands were determined to lack naturalness. It is also important to note that the wilderness inventory is performed based on the existing condition of the area, not on the condition of the area if any number of potential management actions were implemented, such as closing and rehabilitating a road. While such areas may be identified and considered in the review process, they would not be considered to contain wilderness characteristics in their inventoried state. As part of BLM's wilderness characteristics inventory maintenance for the Diamond Breaks area, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the commenter. No new information was submitted that either has not already been considered in BLM's wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved wilderness characteristics inventory maintenance.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Cross Mountain (outside WSA): this area should be managed as VRM Class I instead of the VRM Class III proposed in the Draft RMP. The objective of VRM class III is "to partially retain the existing character of the landscape." Management is so that "the level of change to the characteristic landscape should be moderate." This is insufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate. The objective of VRM Class I is "to preserve the existing character of the landscape" and management is so that the "level of change to the characteristic landscape should be very low and must not attract attention." In addition, the area should be classified as an exclusion (not just avoidance) area for ROWs.	Commenter is incorrect in stating that the Cross Mountain area outside the WSA would be managed for naturalness. The Draft RMP/EIS Alternative D notes that this area would be administered "to provide a recreation experience in predominantly natural settings" (Draft RMP/EIS page 2-95). Under Alternative D this area was already proposed to be an exclusion area for ROWs as the commenter suggests. Concerning the VRM designation, the Draft RMP/EIS chapter 2 narrative incorrectly noted this area was to be designated as VRM Class III. However, the Draft RMP/EIS maps and impact analysis accurately identify this area as VRM Class II. This inconsistency has been corrected in the Proposed RMP/Final EIS. Based on other management decisions in Alternative D that restrict visually obtrusive surface disturbing activities in this area, VRM Class I was not deemed necessary to protect the area's visual resources. The commenter fails to provide any analysis or evidence that VRM

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			Class I would be necessary to protect the naturalness of this area given the other restrictive prescriptions.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Cross Mountain (outside WSA): We also take issue with the conclusion in the BLM's assessment of Cross Mountain that it does not meet the "size criterion" because it does not incorporate more than 5,000 contiguous acres. Draft RMP, Table 3-25, p. 3-86. Because this area is a proposed addition to, and is contiguous with, an existing WSA, this conclusion is inaccurate. Also, as discussed above, under BLM's current guidance, there is no "criterion" for areas to be comprised of more than 5,000 contiguous acres. Further, the Wilderness Act actually provides for designation and management of smaller areas. 16 U.S.C. § 1131(c). The BLM's conclusion should be corrected. We refer you to the attached submission of the updated CWP inventory information for additional information regarding the wilderness values and boundaries of the Cross Mountain unit. The Cross Mountain area, as depicted in the CWP inventory and/or within BLM's jurisdiction, should be managed as lands with backcountry characteristics in the RMP.	The use of size was not intended to be included in Draft RMP/EIS table 3-25. However, these areas were determined to not meet the wilderness characteristics criteria for naturalness. This editing error was corrected in the Proposed RMP/Final EIS.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Pinyon Ridge: this area should be classified as an exclusion (not just avoidance) area for ROWs. Further, this area should be managed as VRM Class I instead of the VRM Class II proposed in the Draft RMP. The objective of VRM Class II is "to retain the existing character of the landscape" and management is such that the "level of change to the characteristic landscape should be low." The objective of VRM Class I is "to preserve the existing character of the landscape" and management is so that the "level of change to the characteristic landscape should be very low and must not attract attention." VRM Class II is not sufficient protection for an area that will be managed for naturalness; VRM Class I is more appropriate.	Commenter is incorrect in stating that the Pinyon Ridge area would be managed for naturalness. The Draft RMP/EIS Alternative D notes that this area would be administered "to provide a recreation experience in predominantly natural settings" (Draft RMP/EIS page 2-95). Under Alternative D this area was already proposed to be an exclusion area for ROWs as the commenter suggests. Concerning the VRM designation, based on other management decisions in Alternative D that restrict visually obtrusive surface disturbing activities in this area, a more restrictive VRM Class was not deemed necessary to protect the area's visual resources. The commenter fails to provide any analysis or evidence that VRM Class II would not be sufficient to protect the naturalness of this area given the other restrictive prescriptions.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	Pinyon Ridge: We also take issue with the conclusion in the BLM's assessment of Pinyon Ridge that it does not meet the "size criterion" because it does not incorporate more than 5,000 contiguous acres when looking at "LSFO-managed portion only." Draft RMP, Table 3-	The use of size was not intended to be included in Draft RMP/EIS table 3-25. However, this area was determined to not meet the wilderness characteristics criteria for naturalness. This editing

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		25, p. 3-86. The Pinyon Ridge unit is contained partially in the Little Snake Field Office and partially in the White River Field Office. However, this does not affect the overall size or manageability of this area to protect its wilderness characteristics. In the same assessment, while considering Diamond Breaks, the agency includes the portion of the CWP unit that is in Utah to determine that it includes more than 5,000 acres. The fact that Pinyon Ridge spans a field office boundary (as opposed to a State line) should not affect the BLM's assessment of its acreage. Further, since the Little Snake RMP is being revised at this time and the White River RMP is not undergoing revision at this time, it is incumbent upon this office to ensure that the Pinyon Ridge area is managed to maximize the available backcountry experiences in a common sense manner. BLM cannot ignore the opportunities and responsibilities for managing these lands because of a field office boundary. Further, as discussed above, BLM's current guidance contains no "criterion" for areas to be comprised of more than 5,000 contiguous acres and even the Wilderness Act provides for designation and management of smaller areas. The BLM's conclusion should be corrected. We refer you to the attached submission of the updated CWP inventory information for additional information regarding the wilderness values and boundaries of the Pinyon Ridge unit. The entire Pinyon Ridge area, as depicted in the CWP inventory information, should be managed as lands with backcountry characteristics in the RMP.	error was corrected in the Proposed RMP/Final EIS.
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	General Guidance: With limited exceptions, surface-disturbing activities or activities that involve the permanent placement of structures are not consistent with protection of wilderness characteristics. Specifically, the following activities should not occur within lands having wilderness characteristics: • Permanent or temporary roads; • Use of motorized equipment or motorized vehicles; • Landing of aircraft (except in emergencies); • Mechanical transport; • Structures, developments, or installations; and • Commercial enterprises. Specific exemptions/allowances are made for: • Valid Existing Rights. Prior-existing rights may continue. New	It is important to note that the management and level of protection of the wilderness characteristics on non-WSA lands is discretionary and not bound by requirements of the Wilderness Act of 1964 or the WSA Interim Management Policy (IMP, H-8550-1; BLM 1995). Unlike designated wilderness or WSAs, there is no statutory or policy directive requiring BLM to protect the wilderness characteristics of these non-WSA lands. These non-WSA lands have many resource values, and the Draft RMP/EIS considered all available information and a range of alternative prescriptions for how the values and uses of the non-WSA lands would be managed. However, BLM may manage the lands to protect and/or preserve some or all of those characteristics through the land use planning process. Through its land use plan revision

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		discretionary uses that create valid existing rights are not allowed if they would detract from the wilderness values. • Administrative Activities. New commercial activities or new permanent roads will not be authorized. BLM may authorize other prohibited uses if it is necessary to administer and protect the lands with wilderness character and to protect the health and safety of persons within the area. Allowed activities include, as appropriate depending upon the character of an individual area: • Managing fire, insects, weeds, and diseases; • Completing recurring Federal mineral surveys; • Continuing established livestock grazing; • Allowing for commercial services to the extent necessary to provide for activities which are proper for realizing the recreational or other wilderness character purposes and are compatible with the defined values; and • Allowing for adequate access to inholdings. Specific Guidance: (1) Emergencies. The use of motor vehicles and mechanical transport, and the construction of temporary roads, structures, and installations is allowed for emergency purposes, but must be conducted to achieve the least disturbance and reclaimed as soon as possible. (2) Land Disposals, Rights-of-Ways (ROWs),and Use Authorizations. Lands managed for wilderness characteristics will be retained in public ownership. They will not be disposed through any means, including public sales, exchanges, patents under the Recreation and Public Purposes Act, State selections or other actions (except where a vested right was established prior to October 21, 1976). Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These also could be renewed if they are still being used for their authorized purpose. The BLM will acquire State and private inholdings when practicable. In unique situations and subject to public review, exchanges may be made involving Federal and non-Federal lands when such action would significantly benefit that area's wilderness characteristics. New authorizations, leases, permits, and ROWs will not be	process with full public participation and to comply with the FLPMA multiple use mandate, BLM has discretion to choose how the non-WSA lands ultimately will be managed, considering all the values and potential uses of these non-WSA lands and the other lands within the planning area. RMP-level decisions identifying management for non-WSA lands with wilderness characteristics are identified in the Draft RMP/EIS on pages 2-47 through 2-51, including management for oil and gas leasing, coal, mineral location, mineral materials, and non-energy leasables, designation of VRM classes, OHV area designations, and restrictions on ROWs, including restrictions on wind energy development. Management decisions made at the implementation level must comply with these RMP decisions. For lands which would be managed to protect wilderness characteristics in the Final RMP/ROD decisions include not allowing activities that would result in a loss of those characteristics. The distinction between RMP-level and activity-level in the BLM decision-making process allows for addressing site-specific proposals at the point the specific project is proposed. In some cases, the RMP objective to protect wilderness characteristics could preclude certain proposed actions at the activity level. As all potential future actions are unknown, it is unnecessary to identify activity-level decisions for lands with wilderness characteristics and instead rely on the RMP's decisions to provide guidance during implementation. For RMP-level management actions, it is important to note that if the section of chapter 2 pertaining to management of lands with wilderness characteristics outside existing WSAs (Draft RMP/EIS Section 2.5.11) is silent on a specific issue, the management located in the other portions of chapter 2 would apply. For example, the commenter's suggested management action #6 addresses livestock grazing, supporting the continuance of permitted existing livestock grazing. The Draft RMP Section 2.6.2 identifies management for livestock grazing for the entire RMPPA. Similarly, Draft RMP/EIS pages 2-98

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		authorized. (3) Routes of Travel. The construction of new permanent or temporary routes or roads will not be allowed. No cross-country motorized or mechanized travel will be allowed within areas managed to maintain wilderness characteristics. Generally, motorized recreation will not be permitted; relocation of motorized recreation, as well as closure and restoration of existing motorized routes, will be prioritized. However, motorized or mechanized use of preexisting travel routes that are necessary for transportation and designated in the plan will be allowed subject to applicable prescriptions or stipulations. Motorized and mechanized routes must be minimized, and closure and restoration of unnecessary routes will be prioritized to enhance and protect wilderness characteristics. Any motorized or mechanized use off designated routes will not be allowed. (4) Locatable Minerals. Existing and new mining operations will be regulated using the 43 CFR 3809 regulations to prevent unnecessary and undue degradation of the lands. (5) Leasable Minerals. Existing mineral leases represent a valid existing right. These rights are dependent upon the specific terms and conditions of each lease. Existing leases will be regulated to prevent unnecessary or undue degradation. No new leases will be issued. (6) Grazing. Existing livestock grazing, and the activities and facilities that support a grazing program, are permitted to continue. Adjustments in the numbers and kind of livestock permitted to graze would be made as a result of revisions in the land use plan. Consideration is given to range condition and the protection of the range resource from deterioration. The construction of new grazing facilities would be permitted if they are primarily for the purpose of protecting wilderness characteristics and more effective management of resources, rather than to accommodate increased numbers of livestock. The use of motorized equipment for emergency purposes and as otherwise permitted under the management plan is allowed. (7) Fire Management. Fire management will be consistent with BLM policy. It may be appropriate to allow natural fires to burn in conformity with a fire management plan, and Wildland Fire Use is to be encouraged. Prescribed fires are allowed in conformity with a fire management plan so long as it is consistent with improving or	and 2-99 include management for potential land actions, including retention and acquisition. This management includes language that exchanges and sales would be undertaken in the West Zone (where most of the non-WSA land with wilderness characteristics are located) only when they would “facilitate better management of BLM lands and benefit the public.” This concept of management for non-WSA lands with wilderness characteristics for certain resources/uses being located in other portions of chapter 2 also applies to most of the suggested management actions contained in numbers 7-11. Some language in the General Guidance section and suggested management action #3 addresses management of routes within non-WSA lands with wilderness characteristics. No non-WSA lands with wilderness characteristics are proposed for cross-country OHV use in Alternatives C or D. Further, the RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. Colorado State BLM policy requires that all areas "limited to designated roads and trails" have completed Transportation Plans within 5 years of the completion of the RMP/ROD that identify designated routes. This transportation planning will be prioritized such that sensitive areas, including key habitat areas, will be completed first. Several of the commenter’s suggested management actions are addressed by BLM policy and do not need an RMP-level decision. For example, the language related to valid existing rights and administrative activities are covered by laws, regulations, and BLM policy. As such, restating them in the RMP is unnecessary.

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		maintaining the area's wilderness character. Minimum impact suppression techniques will be applied. (8) Forest/Vegetation Health. Insects, disease, and invasive species may be controlled if it is determined that it is necessary to meet the minimum requirements to administer and protect these lands. Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the land with wilderness characteristics, or in special instances when the loss to resources may cause adverse impacts to wilderness characteristics. Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness characteristics. (9) Recreation. Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, rafting, canoeing, and trapping are allowed on these lands. Recreational uses will not be allowed if they require: • Motor vehicles or mechanical transport (e.g., mountain bikes) off routes designated as open or limited through the route designation process; and • Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping). New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under its terms and conditions to their expiration date. Recreational or hobby collecting of mineral specimens when conducted without location of a mining claim may be allowed. This use will be limited to hand collection and detection equipment. (10) Cultural and Paleontological Resources. Cultural and paleontological resources are recognized as unique and valuable. They are also important supplemental values to an area's wilderness characteristics. Resource inventories, studies, and research involving surface examination may be permitted if it benefits wilderness values. This	

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		same standard applies for the salvage of archeological and paleontological sites. Rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavations; and extensive surface collection may also be permitted if they maintain the area's wilderness character. Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness. (11) Wildlife Management. Fish and wildlife resources are a special feature that contributes to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character. Nothing will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting and trapping are allowable activities on these lands. The State establishes regulations and enforcement for these uses. Stocking of wildlife and fish species native to the area may be permitted. Introduction of threatened, endangered, or other special-status species native to North America may be allowed. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle of doing the minimum necessary to manage the area to preserve its natural character.	
Lands With Wilderness Characteristics	Wilderness Society (The), et. al.	The BLM must weigh the costs of damaging and possibly permanently destroying the wilderness qualities and cultural resources of these lands against the relatively limited benefits to be gained from oil and gas development. As discussed in The Wilderness Society's "A GIS Analysis of the Undiscovered Technically Recoverable Oil and Gas in the Little Snake Resource Area," found that the entire Little Snake Resource Area contains less than a year's worth of technically recoverable natural gas and a little over 3 hours' worth of oil compared base on current U.S. consumption; while the percentage of these resources that are economically recoverable will be considerably less.	NEPA does not require a comparative analysis of monetary values associated with each alternative. While monetary value can be considered for some resources, such as oil and gas, the accuracy and availability of monetary valuations of non-market resources such as cultural and wilderness values is limited. As required by NEPA, the Draft RMP/EIS presented a range of alternatives and notes the impacts to cultural resources and wilderness characteristics from those alternatives, including for oil and gas development in Vermillion Basin, as well as impacts to other resources/uses/socioeconomics. Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics, including closing the area to oil and gas leasing. Alternative B was also revised to include the 1% limit on surface disturbance.

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			Chapter 4 of the Proposed RMP/Final EIS was revised to reflect the changes in Vermillion Basin management for Alternatives B and C.
Lands With Wilderness Characteristics	Lynda Winslow	- Protect Vermillion Basin and other proposed wilderness lands by closing them to oil and gas drilling and off-road vehicles.	See General Comment Response #4
Livestock Grazing	Form Letter #8	A grass bank would be very helpful for permittees to cope with wildfire or other vegetative treatments that have adverse effects on the forage base of allotments.	The use of reserve conservation allotments (RCAs) is specifically addressed in chapter 2 (Section 2.6.2) and Appendix F of the Draft RMP/EIS. These are used for the purposes noted by the commenter.
Livestock Grazing	Form Letter #8	Livestock grazing must strive for moderate utilization of forage and browse through rotational or deferred grazing systems and appropriate numbers. Existing fences should be utilized to achieve the number of pastures necessary for rotational grazing. Water development or piping should be done to achieve better livestock distribution, rotational grazing, and to protect natural riparian areas.	Consistent with BLM policy, lands would be managed to meet or move toward the Colorado Standards for Healthy Rangelands. When an allotment does not meet the standards, appropriate actions will be taken consistent with 43 CFR 4180. As stated on page 2-174 of the Draft EIS, "Appropriate actions for improving allotments that do not meet Standards and Guides could include, but would not be limited to, adjustment of permitted AUMs, modified turnout dates, livestock water developments, range improvements, modified grazing periods, growing season rest, modified grazing systems, closing areas, riparian pastures, exclosures, implementation of forage utilization levels, and livestock conversions."
Livestock Grazing	Form Letter #8	•BLM must enforce all regulations and stipulations that apply to grazing and any other activities that impact vegetation, soils, and water.	BLM will comply with all laws and regulations and will enforce all stipulations, management actions, and mitigation measures specified in the Proposed RMP/Final EIS.
Livestock Grazing	Form Letter #8	•BLM must analyze and mitigate the impacts to private surface owners and private Animal Unit Month's when leasing federal minerals under private surfaces.	A detailed analysis of impacts from mineral development on livestock grazing is included in Section 4.4.2 of the Draft EIS. BLM will mitigate the impacts to the extent possible, given BLM's obligation to honor valid existing leases.
Livestock Grazing	Moffat County Commissioners	p. ES-13 Livestock Moffat County Requests Reserve Common Allotments (RCA's) not being actively used by grazing tenants will be returned to the livestock community. Assurance is needed that RCA's won't be used as an avenue to remove AUMs from public land. Please incorporate this comment into p.2-77 Livestock Grazing, also.	The Draft RMP/EIS, Appendix F already states, "These allotments may be returned to individual allotment if there is no longer a continued demand for their use."

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Livestock Grazing	Moffat County Commissioners	p. 2-10 – Water Resources Moffat County requests clarifying that range improvements should be mentioned as benefiting water resources and should be allowed, case-by-case, within ¼ mile of a water resource. Range Improvements shouldn't be considered an Appendix M exception, but rather an allowed use. We request this comment be incorporated to ES-7 Water Resources.	Range improvements would be designed for different purposes, depending on the alternative (see page 2-176 of the Draft RMP/EIS). Therefore, range improvements would not be designed to benefit water sources in all cases. However, as part of Alternative C (Preferred Alternative), range improvements would be considered "for the purpose of improving rangeland diversity, condition, and sustainability, by such actions as control of pinyon-juniper encroachment and decadent sagebrush." Therefore, BLM does not believe it is appropriate to incorporate the suggested statement on page ES-7. The 1/4-mile restriction from perennial water sources is an NSO restriction that only applies to oil and gas-related activities (see page 2-119 of the Draft RMP/EIS).
Livestock Grazing	Moffat County Commissioners	P. 2-11. 2.5.3.2 Alternative C: Moffat County requests it be clarified that Range Improvements are allowed within ¼ mile of streams as they will benefit the stream rather than be considered a negative impact. Compatible Range Improvement should not be an exception that needs to be applied for, but rather an allowed use.	The NSO restriction within 1/4-mile of perennial water sources only applies to oil and gas activities. Range improvements would not necessarily be prohibited within 1/4-mile of all perennial water sources.
Livestock Grazing	Moffat County Commissioners	p. 2-76. 2.6.2.1 Livestock Grazing Goal B: Moffat County endorses working with State, federal 'and' private landowners to establish RCA's, not working with State, federal, 'or' private landowners as the RMP currently reads. Please change to reflect that landowners must be involved in all RCA discussions.	Changing the document as suggested would require BLM to work with all such parties, reducing BLM's ability to enter into such agreements if one such party refuses to participate. As written, all parties may be involved, but it provides BLM more flexibility in coordination with interested parties.
Livestock Grazing	Moffat County Commissioners	p.2-77. Livestock Grazing: Moffat County Requests that Reserve Common Allotments (RCA's) not being actively used by grazing tenants will return to the livestock community. Assurance is needed that RCA's won't be used as an avenue to remove AUMs from public land. Please incorporate this into p.ES-13, also.	The Draft RMP/EIS, Appendix F already states, “These allotments may be returned to individual allotment if there is no longer a continued demand for their use.”
Livestock Grazing	Moffat County Commissioners	p. 3-109 Current Conditions-Livestock: Moffat County requests the RMP state that where AUM reductions have occurred, they are temporary and subject to reinstatement up to full preference in subsequent planning.	Adjustment of AUMs is unrelated to RMP planning cycles and is not an RMP level decision. Increases or decreases in permitted AUMs are based on monitoring data.
Livestock Grazing	Moffat County Commissioners	p. 4-31 Analysis assumptions, third bullet point: The RMP assumes adequate forage available for current wildlife and horse herd populations. This is a false assumption. It should be assumed that wildlife, horse herds, and livestock forage are variable from year to year and adjustments in AUMs should be reflected based on range	The Proposed RMP/Final EIS has been modified to remove this assumption. The impact analysis has been adjusted accordingly.

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		condition.	
Livestock Grazing	Moffat County Commissioners	p. 4-162. 4.4.2.3. Alternative C - Impacts on Livestock Grazing 1) Moffat County request a discussion occur about the cumulative impact of BLM decisions on retaining a viable agricultural industry in the LSFO. 2) Moffat County requests the impacts of wild horse management on livestock be described. 3) Moffat County requests BLM identify the impacts to livestock grazing regarding No Ground Disturbance actions in deferred areas, WSAs, Lands with Wilderness Characters, and VRM classes.	1) Cumulative impacts on the agriculture sector are explored in Section 4.5.2 of the Draft RMP/EIS. This section provides an economic forecast and impacts on this agricultural industry. 2) The impact of livestock grazing on wild horses does not vary by Alternative. A description of this impact is provided on page 4-158 of the Draft RMP/EIS. The extent of the competition or overuse would vary based on the time between monitoring of findings and adjustments to grazing use or wild horse populations. 3) The impact of Special Management Areas on livestock grazing is discussed by alterative in Section 4.4.2.
Livestock Grazing	Moffat County Commissioners	p. 4-207 Second to last sentence: Moffat County questions how alternative D would increase AUMs beyond those in alternative C. Please correct or describe reasoning.	Although the focus of the vegetation management actions in Alterative D would not be on forage production, the amount of forage produced over a 20-year period would be greater than if the vegetation management actions of Alterative C were implemented. In both Alternative C and D, it is estimated that approximately half of the increased forage would be made available for livestock use. Therefore, the increase in forage available for livestock would be greater in Alternative D than in Alternative C.
Livestock Grazing	Wes Stay	Does not plan for the restoration and reclamation of the space of land between the Little Snake River and Cold Springs Mtn. to recover from overgrazing. Does not specify the criteria to be used when cutting AUMs.	Consistent with BLM policy, lands would be managed to meet or move toward the Colorado Standards for Healthy Rangelands. The RMP does not attempt to accomplish site-specific analysis on the suitability for livestock grazing by area. When an allotment does not meet the Standards for Healthy Rangelands, appropriate actions will be taken consistent with 43 CFR 4180 in order to achieve the standards. As stated on page 2-174 of the Draft RMP/EIS, "Appropriate actions for improving allotments that do not meet Standards and Guides could include, but would not be limited to, adjustment of permitted AUMs, modified turnout dates, livestock water developments, range improvements, modified grazing periods, growing season rest, modified

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			grazing systems, closing areas, riparian pastures, exclosures, implementation of forage utilization levels, and livestock conversions."
Livestock Grazing	Vermillion Ranch Limited Partnership	Pg ES-13 Reserve common allotments if not productive must be returned to grazing community	The Draft RMP/EIS, Appendix F already states, “These allotments may be returned to individual allotment if there is no longer a continued demand for their use.”
Livestock Grazing	Vermillion Ranch Limited Partnership	Pg 2-76 2.6.2 Livestock grazing: Support with the inclusion of Sustainability objectives developed in NWCOS i.e. decisions must take into account individual permittee and DPC for livestock use.	Consistent with BLM policy, lands would be managed to meet or move toward the Colorado Standards for Healthy Rangelands. When an allotment does not meet the standards, appropriate actions will be taken consistent with 43 CFR 4180. Many factors will be considered in determining the appropriate actions to be taken, including individual allotments and permittees and DPC objectives. As stated on page 2-174 of the Draft EIS, "Appropriate actions for improving allotments that do not meet Standards and Guides could include, but would not be limited to, adjustment of permitted AUMs, modified turnout dates, livestock water developments, range improvements, modified grazing periods, growing season rest, modified grazing systems, closing areas, riparian pastures, exclosures, implementation of forage utilization levels, and livestock conversions."
Livestock Grazing	Vermillion Ranch Limited Partnership	Pg 3-109 3.2.2.1 AUMs: Any reductions or changes must be temporary for no more than the life of the RMP and subject to reinstatement up to full preference in subsequent plans.	Adjustment of AUMs is unrelated to RMP planning cycles and is not an RMP level decision. Increases or decreases in permitted AUMs are based on monitoring data.
Livestock Grazing	Vermillion Ranch Limited Partnership	Pg 4-158 1st full prg last sentence change “achieving” to “requiring” wildlife populations consistent with carrying capacity	Wildlife population objectives are set by the Colorado Division of Wildlife (CDOW) through coordination with BLM and the public. Management of wildlife populations is the responsibility of the CDOW. BLM is responsible for managing wildlife habitat. Therefore, BLM cannot "require" the CDOW to meet its own objectives. Additionally, the statement referred on page 4-158 of the Proposed RMP/Final EIS is associated with actually achieving population objectives, not merely requiring them.
Livestock Grazing	Vermillion Ranch Limited	Pg 4-163 Affects on livestock grazing fails to disclose effects of NGD actions on grazing esp. in deferred areas, WSA and lands with	The Proposed RMP/Final EIS has been modified to remove all NGD and SSR stipulations on surface

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	Partnership	wilderness character as well as VRM II Areas.	disturbing actions under Alternative C (Proposed RMP). The impact analysis has been modified to reflect this change.
Livestock Grazing	Western Watersheds Project	You must consider and evaluate the costs and benefits of various grazing systems, stocking levels, water developments and fences on the ecology of the area, including its wildlife. The current RMP admitted it over-allocated forage by over 100% to livestock, leaving no allocation for wildlife or watershed protection. The LSFO has not reduced stocking levels to provide the forage BLM claimed was needed for wildlife, instead it has postponed dealing with this issue.	AUMs are adjusted/allocated in project-level planning documents based on monitoring data.
Livestock Grazing	Western Watersheds Project	BLM's Land Use Planning Handbook (H-1601-1) Appendix C states that BLM will "Identify lands available or not available for livestock grazing (see 43 CFR 4130.2(a)), considering the following factors: 1. Other uses for the land; 2. terrain characteristics; 3. soil, vegetation, and watershed characteristics; 4. the presence of undesirable vegetation, including significant invasive weed infestations; and 5. the presence of other resources that may require special management or protection, such as special status species, special recreation management areas (SRMAs), or ACECs." We see no analysis that takes into account the well known scientific principles of capability in which the slope of the land, distance to water, soil erosion hazard and production of desirable forage species are analyzed to determine the areas which are capable of livestock grazing with a following determination of which of those lands should be available for livestock grazing based on conflicts with other resource values. These criteria should be codified into a set of numerical criteria and that used to analyze where livestock grazing is capable.	Site-specific scientific analysis to determine which areas are capable of livestock grazing is performed at the activity level, not in a land use plan.
Livestock Grazing	Western Watersheds Project	You must identify scientifically based criteria for grazing including grazing systems, adequate rest, utilization standards, stream bank damage standards and upland utilization and ground cover standards which are enforceable. Then you must demonstrate ability and a willingness to monitor and enforce those standards. Going by qualitative measures such as PFC or Upland Rangeland Health are insufficient as there is inherent bias in these methods. BLM's own technical references document that these qualitative methods must be accompanied by systematic data collection, comparison to reference areas and so forth.	Grazing management is required to conform to 43 CFR 4180, Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration. Qualitative assessments such as Riparian PFC and upland land health assessments are only part of the process by which BLM determines the appropriateness of grazing management under specific permits and leases. Qualitative assessments communication tools and are used to provide an "early warning" of resource problems and are not meant to be the sole driver in making resource decisions.
Livestock	Western	There should be a provision for relinquished grazing permits or	This is a policy-level decision that is outside the

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Grazing	Watersheds Project	buyouts to allow BLM to hold these areas ungrazed by livestock for watershed protection and restoration.	scope of a land use plan.
Livestock Grazing	Western Watersheds Project	Livestock permittees are a small minority of livestock producers in the eleven western states and are insignificant in their numbers or their economic contribution to the States, their local and regional economies. Their numbers and contribution pale in comparison to the natural values of our public lands. Dr. Thomas Power, Chairman of the University of Montana's Economics Department, in Wuerthner and Matteson (2002) points out the minimal economic contribution of federal public lands livestock grazing to local, state and regional economies in the West. That reference can be found on-line at: http://www.publiclandsranching.org/htmlres/PDF/wr_TAKING_STOCK.pdf Dr. Power also points out that the majority of public lands livestock producers depend on non-agricultural sectors of these local, state and regional economies for employment, not livestock production. It is not in the public's interest to blindly continue livestock grazing at unsustainable stocking levels in order to provide a short-term benefit to this small minority, while ignoring the values displaced by livestock grazing.	Management of public lands for livestock grazing is authorized by both the Taylor Grazing Act and FLPMA, as one of the multiple uses. The RMP process is to determine where livestock grazing could be permitted in a sustainable manner. BLM has complied with federal law and bureau policy in determining where livestock grazing can occur across the RMPPA while still meeting the Standards for Rangeland Health, as required by federal regulations.
Livestock Grazing	Western Watersheds Project	Agencies continues to use the "take half/leave half" principle for livestock use. For example, in its permits and analyses, BLM typically includes livestock use levels of 50% of forage as proper. This is done without providing any scientific foundation for this claim, nor is use adequately monitored or used to manage livestock. Hutchings and Stewart (1953) suggested that 25 – 30 % use of all forage species by livestock was proper. They recommended this level because routinely stocking at capacity will result in overgrazing in half the years and necessitate heavy use of supplemental feed. Even with this system, they recognized that complete destocking would be needed in 2 or 3 out of ten years. Holechek et al (1999a) concluded that the research is remarkably consistent in showing that conservative grazing at 30 – 35% use of forage will give higher livestock productivity and financial returns than stocking at grazing capacity. They also recognized that consumption by rodents and other wildlife must be taken into account as part of this utilization. Otherwise, rangeland productivity would suffer even at these levels of use. Galt et al (2000) recommended levels of 25% utilization for livestock and 25% for wildlife with 50% remaining for watershed protection. In none of these cases have the scientists recommended 50% utilization by livestock and they are clear that even at the lower	Setting levels of livestock use in terms of percent of forage used is not an RMP level decision, but is better determined on an allotment-by-allotment basis during activity level planning. Additionally, BLM does not manage rangelands for higher financial returns of livestock lessees, but for rangeland health. Proposed changes to use levels are more appropriately addressed at the activity level.

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		use levels recommended, wildlife use is included.	
Livestock Grazing	Western Watersheds Project	BLM should analyze its past grazing use (AUMs, utilization percent) as compared to precipitation records to show it has managed scientifically and demonstrate that use has not been excessive, that destocking and rest have occurred during drought and propose drought and precipitation based stocking levels.	The purpose of an EIS is not to analyze or justify the effects of past management actions, but to analyze the future impacts of a proposed range of alternatives when considering for the existing condition of the environment.
Livestock Grazing	Western Watersheds Project	Native cool-season perennial bunchgrasses can be very sensitive to defoliation and growing season use. For example, Anderson (1991)1 stated in regards to bluebunch wheatgrass, “Effects of growing season defoliation injury are well documented: basal area, stem numbers and both root and forage yields are reduced and mortality can be high. … Defoliation to very short stubble heights during the boot stage has been reported to essentially eliminate plants within as few as three years. … Vigor recovery has been found to require most of a decade, even with complete protection from grazing.” The author went on to describe experiments in which a single clipping of the grass during the growing season produced 43% less herbage and 95% fewer flower stalks the following year than unclipped plants. Under a deferred system in eastern Oregon, it was reported that bluebunch wheatgrass could not be maintained at 30 – 40% use in the boot stage (early June). A one time removal of 50% of the shoot system during active growth may require six years’ rest even in an area with 17” precipitation.2 Anderson (1991) also makes the point regarding bluebunch wheatgrass that, “The belief that range improvement will occur after one or two years of rest following a single season of more than ‘light’ use during the growing season is erroneous.” Mueggler (1975) also determined that Idaho fescue of moderately low vigor required 3 years of rest for recovery and that plants of bluebunch wheatgrass and Idaho fescue in very low vigor may require 8 years and 6 years of rest, respectively for recovery. BLM failed to consider the recovery, growth and maintenance requirements for these sensitive native grasses in its current or proposed management.	This issue will be considered in site-specific, activity-level planning documents.
Livestock Grazing	Western Watersheds Project	Often cited, Franklin Crider’s study on root growth stoppage from plant top removal provided quantitative measurements of plant re-growth under different amounts of removal (Crider 1955). Three mid-west perennial grasses were grown from seed in pots under ideal conditions of watering and fertilization. After sixty days of growth, these potted grasses were clipped once at intervals from 10% to 90% of the above ground biomass. Repeat clippings of the potted grasses were made every two days to return the plants to the same height as the original clipped percent. The experiment lasted thirty	Developing use levels are beyond the scope of an RMP. They are handled at an activity plan level to address the site-specific vegetation conditions on each allotment.

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		three days at which time root growth of controls became inhibited by the size of the pot. Crider concluded that under these ideal growing conditions, if these species of grasses had 40% or less of their aboveground biomass clipped either once or many times, then the net root mass was the same or more at the end of the experiment. This was used to make the assumption that grazing during the entire growing season at 40% or less would sustain plants from one season to the next. This same study has been used to justify the 50% or "take half/leave half" proposition that range managers have used for decades. Clearly, the long-term range studies cited here show that under actual field conditions, these use levels are excessive and light grazing (25%) with long-term rest for recovery is most equitable to Agencies' mandate for sustainable use.	
Livestock Grazing	Western Watersheds Project	Holechek et al (2001) provide equivalents in forage consumption between livestock and wildlife. They are summarized in Table 4. Studies in the Vernal resource area during the 1970's and 1980's generated many years of quantitative data describing the abundance of many species of animal, bird and insect in the different vegetation types occurring there. This information is available in the Vernal Field Office for review and analysis. Some of it is provided in the (ERI 1984; WRSOC 1984) reports referenced. Final determinations of livestock stocking rates and utilization criteria for livestock must take this information into account, using the current vegetation production for the area under consideration.	Livestock stocking rates and utilization criteria for livestock are determined at the activity level.
Livestock Grazing	Western Watersheds Project	What is an AUM? The Society for Range Management (SRM) in 1974 defined an Animal Unit "to be one mature (1000 lb.) cow or the equivalent based upon average daily forage consumption of 26 lbs. dry matter per day." (SRM, 1974). SRM also defined an Animal Unit Month as "The amount of feed or forage required by an animal unit for one month." NRCS defined the forage demand for a 1,000 pound cow as 26 pounds of oven-dry weight or 30 pounds air-dry weight of forage per day (NRCS 2002). It is important to ensure that forage consumption rates by livestock are based on the size of animals present on the allotment and a reasoned estimate of their daily consumption rates. The following analysis provides some background and justifies a more current forage consumption rate for cow/calf pairs. When records from the permittees are made available, they can be used to determine the actual weights of cattle grazed on the allotment and the consumption rate proposed here can be adjusted to take that into account. The University of Nevada Agricultural Experiment Station published a report on cattle production in 1943 (Brennan and Harris, 1943).	This issue is beyond the scope of a land use plan. Definition of an AUM is defined in the Code of Federal Regulations.

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		That report analyzed 14 years of ranch operation for eleven ranches in northeastern Nevada. At that time, a mature cow was considered one unit and a branded calf or weaner as ½ cow unit, for a combined total of 1.5 cow units per cow/calf pair. Bulls were considered 1.5 cow units. For the period 1938 – 1940, the average turnoff weight (when they left the range) of mature cows was 959 pounds, calves were 381 pounds and bulls were 1222 pounds. This means that in the 1930's, a cow/calf pair was 1340 pounds. With breeding, supplements and hormones, weights have increased over time, for example, Anderson et al (ca 2000) calculated a 35% increase in dressed weights per animal between 1975 and 1995. USDA market statistics4 give the average weights of slaughter cattle for the week ending August 14, 2004 as 1251 pounds. The estimate for the same week in 2005 for slaughter cattle average weight was 1260 pounds. The USDA National Agricultural Statistics Service data for average live weight of cattle slaughtered in 2004 was 1242 pounds compared to 1187 pounds in 1995, or an increase of nearly 8.5% in those 10 years. Holechek et al (2001) summarized the weaning weights of calves grazed on various types of rangelands at different stocking rates. The data for the period since 1990 produced an average weaning weight of 430 pounds and a range of 382 – 475 pounds. Ray et al (2004) gave a weaning weight of 480 pounds for calves. Using the current market statistics for slaughter cattle at about 1250 pounds and assuming a calf weight of 300 pounds to allow for weight gain during the grazing season, an estimate for the average weight of a cow/calf pair during the grazing season of 1,500 pounds seems reasonable. As pointed out above, the NRCS used 26 lbs/day of oven dry weight for a 1,000 pound cow and stated this was equivalent to 30 pounds per day air-dry weight. The NRCS Range and Pasture Handbook value of 30 pounds air-dry weight would be 3% of body weight for a 1,000 pound cow. Applying this to the estimate of a current weight of 1,500 pounds for a cow/calf pair, the daily forage consumption would be 45 lbs of airdry forage per day, or for a month (30.4 days), 1368 pounds of forage per AUM. Forage consumption rates must be calculated based on the current weights and consumption rates of livestock in order to provide the forage needed for wildlife, plant community sustainability and watershed protection and to ensure the public trust is not violated by undercharging for the actual weights of cattle and calves grazed.	
Livestock	Western	2.5 Grazing Systems. In a review paper that considered grazing	Appropriate grazing systems are determined at the

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Grazing	Watersheds Project	systems, grazing intensity and season of use, Holechek et al (1998) determined that, “financial returns from livestock production, trend in ecological condition, forage production, watershed status and soil stability are all closely associated with grazing intensity.” They found that grazing systems such as rest-rotation had limited or no benefit in arid systems. When averaged across all the long-term studies for all regions, heavy grazing was 57% use of primary forage species, moderate use was 43% and light use was 32%. In arid regions, the research showed that moderate grazing use was 35 – 45%. When the average forage production change over time was compared with use, heavy stocking resulted in a 20% decline in production, moderate use experienced no change and light use resulted in an 8% increase. During drought, moderately stocked pastures produced 20% more forage than heavily stocked pastures, light grazing produced 49% more forage than heavy and 24% more than moderate stocking levels. Heavy stocking resulted in a downward trend and light stocking an upward trend in ecological condition. Moderate stocking showed a slight, but not significant increase in condition, resulting in depleted ranges being maintained in depleted condition. Table 5 provides summary statistics from that paper. It must be remembered that these comparisons are to prior heavy use, not to ungrazed lands. It is apparent from these studies that “moderate” use levels will not allow significant recovery of severely depleted range. In fact, in studies of long-term rest at Idaho National Engineering Laboratory, the recovery rate of grasses in sagebrush communities was slow, progressing from 0.28% to 5.8% over 25 years (Anderson and Holte, 1981 and Anderson and Inouye, 2001). It is clear from these examples that native plant communities in heavily depleted sites will require decades to recover in the absence of livestock, while their ability to recover in the presence of livestock at any level of use has not been demonstrated. Relying on additional water developments, fences and grazing systems will not alleviate the problem. The use of range improvements and rotation systems is not sufficient to correct over-stocking. Results from 18 western grazing system studies by Van Poollen et al (1979) found that adjustment of livestock numbers, or stocking intensity was more important than implementing grazing systems to improve herbage production. Holechek et al (1999a) recognized that “various rotation grazing systems cannot overcome the rangeland deterioration associated with chronic overstocking.” Clary and Webster’s study concluded that “managers should place	activity level.

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		more emphasis on proper stocking intensity and less on grazing system implementation. The concentrated use of grazing pastures is not compensated for during rest years if grazing use is heavy. In summary, although grazing systems have great intuitive appeal, they are apparently of less consequence than once thought. In fact as long as good management is practiced so that there is control of livestock distribution and grazing intensity, the specific grazing system employed may not be significant.”	
Livestock Grazing	Western Watersheds Project	Four consecutive seasons of clipping at the seed-in-milk phase reduced basal area of Idaho fescue 80%, bottlebrush squirreltail 62%, longspur lupine 91% and wooly wyethia 16%. Hormay also found that cool-season grasses such as Idaho fescue varied in production by a factor of three due to changes in annual precipitation, while the beginning of growth varied by up to a month with similar variations on time to flowering and seed ripening. In clipping studies, he found that a single clipping of Idaho fescue reduced the basal area of the plant by 49%, while four years of consecutive clipping at the seed in milk phase reduced basal area of Idaho fescue 80% and killed 20% of the plants. Four years’ rest after four years’ clipping resulted in little or no recovery of Idaho fescue, wooly wyethia and longspur lupine. The basic principle enunciated by Hormay, based on his quantitative research, was to require adequate years’ of rest to allow the native plants to recover their vigor before again being grazed. This requires multiple years of rest between grazing periods. They also recommended that it is important to include adequate monitoring of each grazed unit or pasture to determine if these rest periods are sufficient to maintain or restore production. As mentioned above, grazing and rest requirements for key species of grass can be critical. Native cool-season perennial bunchgrasses can be very sensitive to defoliation and growing season use. For example, Anderson (1991)10 stated in regards to bluebunch wheatgrass, “Effects of growing season defoliation injury are well documented: basal area, stem numbers and both root and forage yields are reduced and mortality can be high. … Defoliation to very short stubble heights during the boot stage has been reported to essentially eliminate plants within as few as three years. … Vigor recovery has been found to require most of a decade, even with complete protection from grazing.” The author went on to describe experiments in which a single clipping of the grass during the growing season produced 43% less herbage and 95% fewer flower stalks the following year than unclipped plants. Under a deferred	These are either policy issues above the scope of a land use plan, or are addressed at the activity level. Utilization levels are determined at the activity level.

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		system in eastern Oregon, it was reported that bluebunch wheatgrass could not be maintained at 30 – 40% use in the boot stage (early June). A one time removal of 50% of the shoot system during active growth may require six years' rest even in an area with 17" precipitation.11 Anderson (1991) also makes the point regarding bluebunch wheatgrass that, "The belief that range improvement will occur after one or two years of rest following a single season of more than 'light' use during the growing season is erroneous." Mueggler (1975) also determined that Idaho fescue of moderately low vigor required 3 years of rest for recovery and that plants of bluebunch wheatgrass and Idaho fescue in very low vigor may require 8 years and 6 years of rest, respectively for recovery. BLM failed to consider the recovery, growth and maintenance requirements for these sensitive native grasses in its current or proposed management.	
Livestock Grazing	Western Watersheds Project	Appendix B in Catlin et al (2003) provides a review of grazing systems. It summarizes more than 40 studies concerning rest rotation and related issues. Short term rest (one year) as typically applied does not lead to significant improvements of deteriorated ranges. Clearly, the long-term range studies we have cited show that it is stocking rate, not water developments, or grazing systems that are most important in maintaining or improving rangeland productivity. It is critical that this information be taken into account in determining livestock stocking intensities and evaluating the efficacy of added water developments or grazing systems.	Appropriate grazing systems are determined at the activity level.
Livestock Grazing	Western Watersheds Project	Applied to the management of livestock grazing, the analysis must, on a site-specific level, weigh the benefits and harms of grazing to determine if BLM should allow this use in any given area. Moreover, should the agency conclude that livestock grazing is an appropriate use, BLM must consider multiple-use values in determining how that area should be grazed. National Wildlife Fed'n v. BLM, No. UT-06-91-1 (DOI, Office of Hearings and Appeals, Hearings Div.) (Dec. 20, 1993) at 25, aff'd Comb Wash (citing 43 U.S.C. §§ 1701(a)(8), 1702(c)). Therefore, in establishing grazing thresholds such as stocking rates and utilization levels, BLM is required to abide by "FLPMA's mandate [that it] protect the full spectrum of environmental, ecological, cultural, and recreational values."	Yes, BLM agrees. Analysis on a site-specific level must do this and therefore is addressed at the activity level.
Livestock Grazing	Western Watersheds Project	2.6 Grazing Capability and Suitability Determinations. Current range science recommendations include adjusting the stocking rate for livestock in order to account for distance from water and steepness of slope (Holechek et al, 2001). The Natural Resources Conservation Service has adopted these guidelines for slope	Section 2.6.2 states, "In areas where livestock grazing would not be compatible with other uses, grazing would not be permitted. Public land found not to be suitable for livestock grazing, or public land found to contain resource values that cannot be

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		adjustments (Galt et al, 2000). They note that on cold desert ranges of the U.S., snow reduces water availability problems in winter. Also, sheep do not require water every day and can use areas further than 2 miles from water. Sheep on New Mexico winter ranges used slopes of less than 45% with no adjustment necessary for slope, whereas slopes greater than 45% were hardly used. Regional criteria for the Intermountain Region of the Forest Service designate lands with greater than 30% slope as not capable for cattle and greater than 45% slope as not capable for sheep. Other factors used by the Intermountain Region of the Forest Service for determining lands that are not capable include: current vegetation production less than 200 lb/acre, forested areas and areas with highly erodible soils (Blackwell 2001; USDA 2001). BLM's Land Use Planning Manual requires evaluation of these factors in determining lands to be grazed. Suitability determinations should be performed on those lands that are found capable for livestock to determine whether or not livestock grazing should be allowed. For example, important or critical fish and wildlife habitat, recreation areas, locations of sensitive populations, natural research areas, watershed protection areas among others should not be considered suitable and should be closed to livestock. These capability and suitability determinations are critical components in meeting the definitions and mandates of FLPMA, PRIA, NEPA and other laws regarding sustainability and multiple use.	adequately protected from livestock impacts through mitigating measures, would not be allocated to livestock grazing." These decisions will be made at the activity level.
Livestock Grazing	Western Watersheds Project	3.0 Management Recommendations for Uplands It is critical for you to incorporate the science we have cited in your analysis for planning and permit documents to ensure that best available science is applied on the ground. In this way, it may be possible to sustain livestock grazing on those lands that are capable and suitable. The following steps should be implemented in each of these efforts. 3.1 Literature Review. Review the literature on the effects of grazing livestock in arid environments. This review should address the effects of different levels of grazing intensity (stocking rate), grazing systems, range improvements and livestock exclusion on upland habitats. It should include an evaluation of their effects on maintenance, productivity and recovery rates of native plants and soil communities. It should also review the use of various standards, indicators and monitoring methods used to manage grazing and their ability to accurately and timely assess and be representative of plant and soil community characteristics.	This type of analysis is appropriate at the activity level.

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		3.2 Determine Soil and Plant Community Status. Using GIS, map all vegetation, range site types and soil types on lands in the affected areas. Design and carry out a science-based review of existing information and a field survey to accurately assess current conditions in the plant and soil community. This survey should determine the distribution of plant species, their ground cover and production. It should do this by allotment, pasture and range site (soil) type. Survey locations should be selected to incorporate distance to the nearest source of water so effects due to proximity to water can be determined. The survey should also include considerations of slope in order to assess the interaction of susceptibility to erosion based on slope and proximity to water sources. Results should be analyzed in the context of past grazing management including type of livestock, seasons of use and grazing intensity. Summarize historical actual use records and grazing systems for each allotment to provide a basis for evaluating proposed actions. 3.3 Determine Capable and Suitable Acres for Livestock Grazing. Based on the science we have provided and criteria we have discussed in the documents cited, (slope, distance to water, forage production, hazard of erosion, etc) establish a protocol for determining capable and suitable lands for livestock grazing. This protocol should include a recovery prescription for lands that are severely depleted of their native herbaceous plant communities or have bare ground exceeding thresholds that lead to accelerated erosion. 3.3 Determine a Sustainable Livestock Stocking Rate. Establish the percent of diets of domestic sheep, cattle, deer, elk, pronghorn and sage grouse that are grasses, forbs and shrubs and their seasonal variation in selection of these foods. We suggest information from Holechek et al (2001) as a starting point. Using this information and the population management goals for wildlife, calculate wildlife needs. This should include the stubble height and other criteria established in Braun et al (1977) and Connelly et al (2000). Based on the information we provided in section 2.0 above, and the limitations on use of perennial grasses established by the scientific review, calculate the available AUMs of palatable native forage grasses, forbs and shrubs that can be utilized by livestock without impairment of plant productivity. Use this analysis to determine livestock stocking rates for each allotment and pasture for normal and dry precipitation years. Livestock numbers should not be increased during above normal precipitation years to allow for	

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		improvement of plant and soil conditions. 3.4 Develop a Systematic Monitoring Protocol. Based on the science we have referenced here, develop a systematic monitoring protocol for assessing and controlling livestock use (forage amount) in a timely manner to avoid over use of any pasture. The timing of measurement must be established relative to the permitted grazing season of use. It is critical that during the early years of application, these must be assessed frequently in order to ascertain the length of time livestock may remain in each pasture before excessive use occurs. This information will lead to establishment of realistic grazing schedules that lower the risk of excessive livestock grazing and damage. If indicators such as stubble height are proposed, they must also have a demonstrated relationship to actual percent use on grasses, forbs and shrubs by field testing. 3.5 Determine Recovery Prescriptions for Lands Below Potential. Analyze peer reviewed science and government publications we have referenced as well as others that have specifically evaluated different grazing scenarios and their ability to recover native components of damaged arid lands to their potential. Use this information to develop recovery prescriptions for allotments and pastures that are not at potential (based on their departure from potential species distribution, ground cover and productivity). Prescriptions that should be evaluated should include options such as (a) long-term rest, (b) reduced stocking rates, (c) grazing systems, (d) reseeding, (e) vegetation treatments and others. The time required for recovery of potential should be evaluated for each method. 3.6 Determine Impacts of Water Developments. Water developments have been used for decades on the promise that they would result in better livestock distribution and improvement in conditions on the ground. WWP is not aware of any efforts of agencies to actually assess these claims. It is critical that you provide this analysis based on evidence from the literature and your own survey of conditions in the area affected. The analysis described in sections 3.1 and 3.2 above should include an element that locates and maps all water developments in the affected area. Based on field surveys combined with historical range data and satellite imagery, determine the impacts and/or benefits of these past water developments on upland plant communities and soils. The effects of these water developments on their source waters (spring, stream or seep) and associated wetland habitats should be assessed, documented and reported in each project analysis.	

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Livestock Grazing	Western Watersheds Project	4.0 Management Recommendations for Riparian Areas You must provide assured protection of springs, streams, riparian areas and wetlands as these areas are highest in wildlife values, yet occupy only a small land area. While continuing to propose additional water developments and grazing systems as means of protecting riparian areas, Agencies do not provide scientific evidence that the values of these areas are actually protected by these methods. The evidence in the government and scientific literature is that excluding livestock from riparian areas is the only effective method of protection and recovery. You should objectively evaluate alternatives to livestock exclosures in the literature review proposed in paragraphs (4.1) and (4.7) below and include those evaluations and the science upon which they are based in your analysis. We are concerned over the lack of quantitative monitoring of streams, springs and riparian areas. Some of the limitations of the current BLM PFC assessment technique are discussed in Stevens et al (2002). BLM and other Federal Agencies have not provided any systematic protocol for this monitoring and in general do not assess spring or wetland conditions, resulting in the loss or serious degradation of these vital resources. We are concerned that reliance will be placed on stubble heights without providing any evidence that, in arid ecosystems, use of this standard promotes recovery of critical habitat elements in damaged stream or wetland systems, or for that matter, prevents degradation of those attributes. If stubble height is used, it must be correlated with percent riparian vegetation use and a stubble height standard set so that livestock use is kept within constraints that do not lead to lowered production of riparian vegetation in future years. In addition, it must be shown to be protective of stream bank integrity through comparison to percent bank trampling, bank erosion and bank stability. The literature review we propose in section 4.1 should address these issues, establish and justify riparian utilization standards and bank trampling standards that are protective of stream banks and riparian vegetation. This analysis of this and other issues presented below must be incorporated into each project analysis. 4.1 Literature Review. Review the literature on the effects of livestock grazing, grazing systems, range improvements and livestock exclusion on stream, spring and riparian habitats, their maintenance and recovery as well as water quality. Carter (2001) reviews the effects of livestock grazing on riparian areas and water quality. This report is available on line at:	Monitoring tracks the effectiveness of management decisions in maintaining riparian areas. Alteration of BLM's monitoring methods, including changing PFC evaluations, is not an RMP level decision. Methods and management considerations for protecting riparian values are designed at the activity level based on site-specific monitoring to address specific impacts.

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		http://www.westernwatersheds.org/reports/grazeWQ_JCarter/WQWWP.doc. Review the use of various indicators such as riparian stubble height and bank trampling measures, their application and relation to stream bank stability, riparian vegetation productivity, in-stream aquatic habitat and restoration rates. 4.2 Assessment of Current Condition of Springs, Seeps and Wetlands. Locate and map all springs and wetlands. Photograph and describe each, document whether and how they have been modified for water developments and if so, whether the development is still functioning. Assess their current condition, wetland extent (area) and flow using photographs and DOI (1994). These habitats should be surveyed to establish a current baseline. The surveys should also be repeated during each permit mid-term and one year prior to permit renewal. Conduct the baseline mapping, analysis and photographs for each project. 4.3 Develop a Monitoring Protocol for Springs, Seeps and Wetlands. Based on the science reviewed in section 4.1, develop a systematic monitoring protocol for livestock use of riparian/wetland herbaceous vegetation at springs, streams and wetlands. 4.4 Assessment of Current Condition of Streams. Based on best available science, describe a methodology and schedule for performing stream habitat and water quality surveys. This should include analysis of existing data and collection of baseline habitat and water quality data, maps and photographs that will be included in each project analysis. 4.5 Develop Stream and Water Quality Monitoring Protocol. In addition to the baseline survey, the project analysis should develop a monitoring protocol that provides for assessment of stream habitat and water quality during succeeding permit terms near the permit or lease mid-term and the year prior to renewal. This monitoring protocol should continue to include PFC assessments using DOI (1993) as modified by Stevens et al (2002). Winward (2000) also provides insight into stream and riparian monitoring technology. Any of these protocols must be supplemented by collecting additional data that quantitatively documents certain critical stream habitat conditions. We suggest the Rosgen method, USDA (1992, 1997) or other acceptable fish habitat survey protocols. Regardless of method, certain critical pieces of information must be collected to supplement PFC assessments. The literature should be reviewed and analyzed and details of methodologies, data management, reporting and public access explained. Describe the monitoring protocols. This description will include: the	

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		actual methodologies, data entry forms, schedules and locations; provide maps of all locations for monitoring; and incorporate an electronic database with links to maps that is accessible to the interested public. Include the baseline data in each project analysis. BLM must show it has the capability, either with its own staff or outside contractors, to do the necessary monitoring to ensure recovery and prevention of future degradation. 4.6 Develop Stream, Spring and Wetland Recovery Prescriptions. For streams, springs and wetlands that are not functioning properly and/or have impaired water quality, analyze available methods for their recovery. Include an anticipated time frame for recovery to take place based on the scientific literature. Discuss and evaluate these options for recovery, including their costs and benefits and review the scientific literature provided. Methods for recovery should include consideration of: (a) closing pastures; (b) exclosure fencing; (c) removal of water developments; (d) restoration/replanting of riparian areas; (e) active herding to minimize livestock use; (f) removal of livestock when utilization standards are reached and any other methods discovered in the literature. Propose and adopt methods that will best recover these degraded streams during the first permit term. In the on-going permitting, management and monitoring of livestock grazing, the land use plan should require documentation of condition and recovery rates by implementation of the described monitoring program. These will be analyzed to demonstrate the changes resulting from application of the particular prescription or combinations of methods adopted.	
Maps/GIS	Colorado Snowmobile Association	MAPS As part of proper analysis and disclosure of recreation opportunities for the Final EIS, we suggest that a map showing existing snowmobile/OSV routes in the analysis area be included. Additionally, if any of the various alternatives propose to add or delete snowmobile/OSV trails, maps should be added for all pertinent alternatives to more clearly present potential effects.	It is important to note that transportation decisions at the landscape level (RMP decisions) are limited to area designations (open, closed, limited). The Draft RMP/EIS does not designate any routes. However, some areas of the RMPPA have already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. Additionally, a collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Within 5 years of the completion of the RMP, all areas where OHV use is limited to existing or designated roads and trails will have completed Transportation Plans,

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			designating routes and performing the associated public review and NEPA compliance.
Maps/GIS	Henry Keesling	Maps to not adequately display the needed information to understand where the lines are on the ground. Case in point, Map 2-47, Off-Highway Vehicle Use Designations - Alternative C (Vol 2 of 2). This was an original comment made in 2006 and in previous years. Maps at an adequate scale and data standard for evaluation of proposed Section 106 actions is 1:24000, USGS TOPO Map scale. They were never provided to make the needed evaluations for known cultural resources present or existing Class III cultural resource surveys that had been conducted in the proposed OHV play area. Maps for the DRAFT RMP Public document review should be provided at least at 1:100,000 scale.	The maps in the Draft RMP/EIS were generated at the best practical scale to convey the decisions being made for the size of the publication. Map content was developed from BLM standard GIS datasets and presented on the maps with the most clarity possible. Each map was designed to display specific information, resulting in selection of a scale and legend to accommodate the individual requirements of the text. The 8 1/2" by 11" format for the maps in the RMP sometimes creates a problem when detail rather than precision is needed for review. However, commenters seeking more specific detail could have contacted the BLM Little Snake Field Office to obtain more detailed information. Such an avenue was encouraged in the Draft RMP/EIS Notice of Availability in the Federal Register.
Maps/GIS	Questar, Rockies Region	Vol. 2, Figure 2-16: Clarify the NSO and CSU areas shown on this map and identify the precise areas that are restricted. The map appears to show NSO and CSU areas that are over one mile wide. No information is give as to the reason for the restrictions.	There is no Figure 2-16 in Vol 2 of the Draft RMP/EIS. However, assuming the commenter is referring to Map 2-16 (Oil and Gas Leasing and Development Restrictions - Alternative C), the areas with CSU and NSO stipulations are plainly depicted on the map with color-coded references in the legend. The sources of the stipulations shown on this map are contained throughout chapter 2, and most specifically in Tables 2-11 and 2-12. In many instances, this did result in CSU or NSO polygons larger than one mile. The impacts from these decisions are noted in chapter 4.
Maps/GIS	Tri-State Generation and Transmission Association, Inc.	Maps (Vol. II): Consider including maps in the Proposed RMP/Final EIS that show the existing major transmission lines and distribution lines, and other major linear utilities, i.e., pipelines, within the RMPPA. Map 3-38 does not include this information. These maps are available from the utility companies that have facilities within the RMPPA. Consider designating and including maps showing proposed utility corridors from the areas of renewable resources (wind energy) to major transmission ties (substations).	The Draft RMP/EIS, chapter 2 (page 2-99 and 100) does identify areas where minor ROWs would be encouraged. In addition, the Draft RMP/EIS (page 3-93) identifies the location of nine existing ROW corridors. ROWs would be encouraged in these two types of areas. Regardless of the location, placement of ROWs would be established on a case-by-case basis considering the issues and resource conditions at the time of establishment.
Maps/GIS	Wilderness Society (The),	A map depicting the lands with wilderness characteristics outside WSAs should be included in Chapter 3 (Affected Environment) of	Draft RMP/EIS Map 3-27 depicts the Citizens' Wilderness Proposal areas within the RMPPA. Draft

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	et. al.	the RMP and Map 3-29 (Backcountry Areas), which depicts the lands with backcountry characteristics outside WSAs, should be clearly labeled and identify the areas by name.	RMP/EIS Map 3-29 depicts wild and scenic rivers, not depict backcountry areas. Maps 2-38 and 2-39 show the backcountry areas for Alternatives C and D, respectively. Using the backcountry management on page 2-94 of the Draft RMP/EIS and Map 3-26 (WSAs), the reader can identify the four backcountry areas by name.
Paleontological Resources	Henry Keesling	p. 2-34, 2.5.10 Paleontological Resources Why is there no discussion of the proposed OHV play area and OPEN area impacts to Paleontological Resources? Without seeing any data standard maps, 1:24000 scale, it appears that portions of the Miocene and Eocene "type sites" are in the proposed open OHV area. This section needs a discussion of impacts etc. resulting from the proposed action. Make sure that this also tracks through the other programs e.g., wild horse management, soils, air, water, birds, wildlife, etc.	Chapter 2 does not present impacts; it presents the range of alternatives (see Draft RMP/EIS page 2-1). As noted in the Draft RMP/EIS page 2-7, chapter 2 decisions are categorized by resource; therefore, decisions about where OHV use is allowed and with what limitations are located under the Transportation and Access and Travel Management heading (Section 2.6.6). A review of the Draft RMP/EIS maps 2-45 through 2-48 (OHV designations) and map 3-25 indicates that there is overlap between the South Sand Wash OHV open area and Class I and II paleontological potential areas. This is further clarified in the Draft RMP/EIS Section 4.3.10, which notes that under Alternative C there would be 21,360 acres of OHV open areas in Class I and II paleontological potential areas. The impacts to paleontological resources from such an overlap are also noted. Impacts from OHV decisions to other resources are contained under each resource's heading in chapter 4.
Paleontological Resources	Henry Keesling	p. 2-145 and 2-146, Paleontological Resources The same comment applies to alternatives. Please change A, B, D to C and have A, B, D reference Alternative C. Paleontological resources are major components within the proposed OHV play area, and should be addressed here as well. The paleontological resources existing data review should be done for the OPEN area. Provide that data in the DRAFT.	Alternative A is taken from the 1989 Little Snake RMP Record of Decision. It cannot be changed. In addition, Alternatives B, C and D are already the same. Concerning the OHV open area, the paleontological information presented in the Draft RMP/EIS (chapter 3 and Map 25) is sufficient to set the stage for analysis of impacts in chapter 4 and to develop a range of alternatives for chapter 2. As noted in the Proposed RMP/Final EIS, most of the open area has a potential to contain PFYC Class 4 or 5 paleontological sensitivities.
Paleontological Resources	Henry Keesling	p. 2-146: Please cite the field survey requirements and other standard stipulations already established in BLM Information Memo (IM) and Information Bulletin (IB) documents for the program. Providing incomplete or "new" requirements for levels of survey	There is no need for the Draft RMP/EIS to reiterate the entire policies that have already been established, whether in IMs, IBs, handbooks, or manuals. Such established policies will be in force

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		work and stipulation is not helpful, and is misleading to the public.	for implementation regardless of if they're specifically mentioned in the RMP. Additionally, BLM planning handbook (Appendix C page 10) notes that land use plan-level decisions for paleontological resources include identification of criteria "to ensure that areas containing, or that are likely to contain, vertebrate or noteworthy occurrences of invertebrate or plant fossils are identified and evaluated prior to authorizing surface-disturbing activities…" The Draft RMP/EIS complies with this direction in establishing inventory requirements for areas of various paleontological sensitivity.
Paleontological Resources	Henry Keesling	To p.2-147: The word "cultural" should be changed to paleontological. Check with Mr. Harley Armstrong, Grand Junction Field Office, to see if this is a stipulation for the paleontological program.	The Proposed RMP/Final EIS has been revised to correct this error.
Paleontological Resources	Henry Keesling	p. 4-110: The discussion here is as confused as the cultural section. This stems from such statements as found on p. 4.115, "Impacts from paleontological resource management actions..." Paleontological resource management actions do not cause impacts! Please correct.	The commenter seems to be interpreting the word "impact" as a negative result, assuming a negative connotation. As noted in the Draft RMP/EIS chapter 4 page 4-2, "impacts could be perceived as beneficial (positive) or adverse (negative) by different readers." Therefore, paleontological actions from chapter 2 that includes, as directed by the BLM planning handbook (Appendix C page 10), "management recommendations…to promote the scientific, educational, and recreational uses of fossils" would have an impact that would result in protecting paleontological resources, as already noted in chapter 4 of the Draft RMP/EIS.
Paleontological Resources	Henry Keesling	For cultural/paleontological program resources the statement relating to "...adaptive management...until indicators show..." page 4-176, disregards previously provided information about known significant cultural and paleontological resources present in the proposed south Sand Wash OHV play area.	The impacts in the Draft RMP/EIS on pages 2-227, 4-175, and 4-176 have been revised to remove the concepts of adaptive management resulting in protection of resources. Impacts from the OHV decisions on cultural and paleontological resources are located in the Draft RMP/EIS, Sections 4.3.9 and 4.3.10, respectively.
Policy (NEPA)	Lester Crawford	After spending some part of the day on May 15 2007 at the field office in Craig, I am more convinced than ever that the only right and responsible action for the BLM to take is "no action" or alternative A. This is the right action because I had three employees of the Little Snake River office tell me that the information that was in both the	BLM used a variety of sources (Federal Register, RMP website, public meetings held at three locations throughout the RMPPA, and a newsletter to the entire RMP mailing list) to inform members of the public of opportunities to comment on the Draft

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		local papers was incorrect and totally wrong. And I know for a fact that many of the motorized users were sending their e-mails to the wrong e-mail address that was in the Steamboat Pilot. These papers are where we locals got information from, if it's all incorrect then how can we comment on these proposals?	RMP/EIS. The Steamboat Pilot immediately corrected the e-mail address after the error was reported, and they also printed a correction the next day. BLM wrote a Letter to the Editor of the Craig Daily Press to clear up the misinformation about proposed closures in Sand Wash. While BLM regrets the incorrect information was published in papers, there were several other outreach methods through which a large number of the public, from a wide array of interests, was able to obtain information and comment on the Draft RMP/EIS. Because on the variety of methods used to disseminate information, BLM feels there were sufficient opportunities to access the Draft RMP/EIS and to provide their comments.
Policy (NEPA)	Henry Keesling	Use of adaptive management in establishing the OHV play area and OPEN areas is the greatest problem this DRAFT has. Clearly this is a major mistake in understanding of what adaptive management is and what it can do. Clearly adaptive management has not replaced NEPA and Section 106 or other laws, regulations, and policies that BLM LSFO must comply with when proposing massive project specific impacts of this scale. This mistake needs to be resolved. These comments and resulting impacts may apply to other resources.	OHV open areas are proposed as part of the management actions under Alternatives A, B, and C (see chapter 2 of the Draft RMP/EIS). The adaptive management process does not establish the OHV open areas, and the Draft RMP/EIS did not purpose such (see Draft RMP/EIS page 2-109). However, the Transportation and Access portions of chapter 2 have been revised in the Proposed RMP/Final EIS to clarify future transportation planning efforts, and specifically to remove language associated with adaptive management and future OHV decisions. BLM will comply with all laws and regulations during implementation of the RMP as well as future transportation management actions.
Policy (NEPA)	Henry Keesling	LSFO needs to provide and discuss the complete environmental analysis and mitigation related to these projects. In addition, Activity Level plans will be needed for these areas. They will include budget funding needs for all programs that the proposed actions will impact. The signing of the ROD would then commit LSFO to the budgets and staffing levels for adequate project development and management in future years for the proposed actions. The effort to establish these areas (OHV Play Area) as a specific open area without adequate analysis, all seven-critical elements of a NEPA document, and needed funding and staff in this document is flawed.	The analysis of environmental impacts is included in chapter 4 of the Draft RMP/EIS, including impacts to the "critical elements" identified in BLM's NEPA handbook and regulations. Subsequent activity-level NEPA analysis will be required and completed for specific proposed projects (see Appendix F of the Draft RMP/EIS). Establishing budgets and staffing levels is not an RMP issue, and is outside the scope of the analysis for the EIS. Congress and administration personnel develop budgets that the Field Office can use. It is not possible to predict the actual availability of funding and personnel to carry out implementation.

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Policy (NEPA)	Henry Keesling	If LSFO is going to have OPEN AREAS designated PLEASE, provide the seven critical element NEPA/EA level analysis for those areas. Please make a clear statement addressing the OPEN AREA issue.	A detailed analysis of the impacts of OHV use on all other resource values and uses is included in chapter 4 of the Draft EIS. This analysis included impacts to the "critical elements" identified in BLM's NEPA handbook and regulations. Subsequent activity-level NEPA analysis will be required and completed for specific proposed projects (see Appendix F of the Draft RMP/EIS).
Policy (NEPA)	Henry Keesling	Please explain here why current Section 106 and NEPA process is not being followed to mitigate these impacts. Please explain, somewhere, the rationale for this action? Why is the BLM LSFO, as the stewards of these resources, going to turn its back on the obligations with which the people of the United States of America have entrusted BLM. Incorrectly applying adaptive management concepts thus allowing these impacts is incorrect, DRAFT pages 2-227, 4-175, 4-176. Adaptive management is a concept of management and has no legal basis to accomplish the actions presented here. Provide adequate cultural resource analysis for this proposed action.	BLM will comply with all laws and regulations. However, complying with all laws and regulations and implementing mitigation measures will not result in the elimination of all impacts. As acknowledged in chapter 4 of the Draft RMP/EIS, some impacts to resource values and uses will occur from implementing the alternatives presented in chapter 2. BLM believes Alternative C provides the best balance of allowing for resource use while protecting important resource values. The impacts noted in the Draft RMP/EIS on pages 2-227, 4-175 and 4-176 have been revised to remove the concepts of adaptive management resulting in protection of resources. A detailed analysis of impacts to cultural resources from the various alternatives is included in Section 4.3.9 of the Draft RMP/EIS.
Policy (NEPA)	Wilderness Society (The), et. al.	As discussed above and in the Draft RMP (pp. 4-43 through 4-47) the indirect impacts on wildlife extend well beyond the physical footprint of the roads well pads and other infrastructure. The BLM must consider indirect impacts in evaluating potential management proposals.	As noted in the comment, the Draft RMP/EIS does consider indirect impacts on wildlife, including those that extend beyond the roads and well pads. As part of chapter 4, these analyses are considered in evaluating the management alternatives.
Recreation	Colorado 500	Demographics: While it is generally set forth in the Draft, it should be noted that the vast majority of recreational use of the Little Snake plan area involves motorized recreation –motorcycles, ATV's and jeeps – all utilized for recreation unto themselves, as well as associated camping, sightseeing, exploring, etc. Grazing is no doubt the second primary use, with oil and gas development soon to reach greater levels. We have observed few hikers and a small number of mountain bikers. The point is that all facets of the RMP should not be driven by hypothetical issues raised by groups that rarely recreate in the area.	OHV use is one of the fastest growing recreation opportunities in the RMPPA, but has the potential to conflict with other recreation uses, such as hiking, biking and equestrian use, which use many of the same roads and trails. In addition, many recreation experiences require quiet and solitude, such as backcountry experiences or wildlife viewing. OHV use in the same area can frighten away wildlife and create noise across great distances. There are Special Recreation Management Areas where OHV use is open or limited to designated routes. The management actions proposed under Alternative C will offer management flexibility to ensure that

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			resource values and uses are protected while allowing for acceptable levels of all user groups and recreation opportunities. Some portions of the planning area are closed to OHV use while other sensitive areas are limited to designated roads and trails.
Recreation	Colorado 500	Serviceberry: We suggest that motorized use be seasonally limited to the hunting seasons instead of imposing a year long closure.	Under the Proposed RMP (Alternative C), only OHV use in the Serviceberry SRMA Zone 2, or the backcountry area, would be closed to OHV use. OHV use in Zone 1 (Willow Creek and north Serviceberry areas) would be limited to designated routes year-round. Allowing seasonal OHV use throughout the entire SRMA would not be consistent with the SRMA objectives under the Proposed RMP (Alternative C).
Recreation	Colorado Mountain Club	TRAVEL & RECREATION: I concur with the agency's stated goal of providing for a better balance of recreational opportunities on the resource area. However, even with this intent, the agency appears to remain heavily biased in favor of off-road vehicle recreation. Internal agency memoranda strongly encourage local managers to move to a system of designated trails for ORV (OHV) use, with open travel areas being strictly limited. The Colorado Off Highway Vehicle Coalition (COHVCO) is a strong proponent of motorized enthusiasts using such trails, as demonstrated by the COHVCO "Stay the Trail" media campaign. Given these factors, it is odd that the preferred alternative still includes thousands of acres, particularly in Sand Wash Basin, as open play areas. The agency should follow its internal memoranda, and the organized motorized recreation community itself, and confine open travel to no more than a few hundred acres. The agency during the NWCOS process identified the backcountry parts of the resource area as the primary places for primitive, non-motorized recreation. However, the preferred alternative closes only 7% of the entire resource area to ORV use. Such a minimal amount does not provide for a quality, non-motorized recreational experience. Such places as Cedar Mountain; Zone 1 of Serviceberry SRMA; Dinosaur North Area; Cold Springs Area; remain open to ORV usage on designated routes. In order to sustain a primitive, backcountry recreational experience, these areas should be closed to use by ORVs except where valid existing rights such as maintenance of stock tanks would be impacted. Vermillion Basin should also be closed to ORV use, as should areas identified as Citizen Proposed Wilderness, with the same proviso for existing	The Draft RMP/EIS evaluated a broad range of alternatives of opportunities for non-motorized and motorized uses. The alternatives evaluated closing areas to OHV use on a range from 4% (Alternative B) to over 21% (Alternative D), not including other area limitations for OHV use, such as limiting use to existing roads and trails, or seasonally. The alternatives also analyzed managing areas for open OHV use on between 86% (Alternative B) to 0% (Alternative D) of the RMPPA. It is also important to note that areas where OHV use is limited to designated routes would result in the majority of those areas receiving no OHV use as well, as the use and associated impacts would be constrained to the routes and areas immediately adjacent to them (see impacts described in chapter 4). Further, text has been added to the Proposed RMP/Final EIS clarifying that within five years of the completion of this RMP, a collaborative transportation planning process will establish a comprehensive designated route system for all areas where OHV use is limited to designated or existing roads and trails. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. This transportation planning will be prioritized such that sensitive areas will be completed first.

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		rights. I encourage the agency to explore other areas for potential for primitive backcountry recreation. In the far northwest of the resource area, the area east of Antone Gap and north of County Road 72, towards Diamond Mountain, may have potential. Likewise, the area northwest of Antone Gap, towards Middle Mountain, may have possibilities. These areas do not seem to be mentioned at all in any alternative. The preferred alternative doesn't seem to have much distinction, if any, between designated and existing routes, for motorized recreation travel. The agency should not automatically assume that every existing route is a candidate for becoming a designated system route, even if proposed as such by motorized users. Some existing routes may be on fragile soils; may impact or potentially impact cultural sites or sites with rare plants; may be part of a spaghetti type trail system of multiple routes leading to the same destination. Even if motorized users have GPSed such routes does not mean they aren't environmentally damaging. The agency should do a travel planning assessment in the immediate near future to avoid further damage, as the system moves from an open travel format to that of designated trails.	Some areas of the RMPPA has already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. Impacts from future route designation will be analyzed in the NEPA document(s) associated with those decisions. The management actions proposed under the Proposed RMP offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels use and recreation opportunities.
Recreation	Colorado Off-Highway Vehicle Coalition (COHVCO)	There is a great deal of attention being paid to the niche of public lands. It appears that the Little Snake Office recognizes for the most part the long history of motorized recreation and suitability of the resource in light of the lack of non-motorized use. Yet there remains some trepidation for expansion to accommodate other remote future use. This collides with the philosophy being expounded by land management agencies that “not every type of activity can take place on every foot of public land”. If the Little Snake is primarily suited for motorized, managed for motorized and used by motorized why are we squeezing other uses into the picture? Please be consistent.	The Draft RMP/EIS does not claim that the Little Snake RMPPA is primarily suited for motorized use, nor does monitoring, trends in SRP requests, or other available forms of data support such a claim. Additionally, the area is not managed for motorized use, as the commenter claims. The management alternatives, and those specifically within the Proposed RMP (Alternative C) comply with the FLPMA mandate to manage lands for multiple uses. The term "multiple use" as defined in FLPMA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction does not require that all uses be accommodated in all areas, but that certain areas can be managed for a given resource, where another area may be managed for a given use. The alternatives in the Draft RMP/EIS and Proposed RMP/Final EIS reflect this provision. Not all areas would be open to all types of uses in the planning area or open in the

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			same timeframe. The alternatives presented in the Draft RMP/EIS and modified in the Proposed RMP/Final EIS offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of all user groups and recreation opportunities. Some portions of the planning area are closed to OHV use while other sensitive areas are limited to designated roads and trails. The RMP provides management that allow for multiple use and flexibility and provides for a balanced mix of motorized and non-motorized opportunities across BLM administered lands.
Recreation	Colorado Snowmobile Association	Page 3-111: 3.2.3.1 Recreation Use Current Conditions (1st paragraph) - there is again a discussion regarding "general recreation use" activities in the RMPPA, with no mention of snowmobiling.)	Language concerning snowmobile use within the RMPPA has been added to the Proposed RMP/Final EIS chapter 3, Travel Management Section (3.2.6.1).
Recreation	Colorado Snowmobile Association	Page 3-113: 3.2.3.1 Recreation Use Current Conditions (1st paragraph) - there is extensive discussion regarding increased OHV use and related complaints. The examples cited generally reflect non-winter issues caused by wheeled OHVs: conflicts with grazing management, failure to close gates, vandalism to fences, degradation of hunting experiences, proliferation of user-created routes, and the conversion of single-track trails to wider two-track trails. If this is part of the "analysis" used to propose closing up to 861,030 acres to snowmobiles, it is improper and inadequate.	Language concerning snowmobile use within the RMPPA has been added to the Proposed RMP/Final EIS chapter 3, Travel Management Section (3.2.6.1). Additionally, BLM has revised OSV use and its impacts in the Proposed RMP/Final EIS. BLM still has concerns that OSV travel could disturb animals during critical time periods (winter months). However, when snow depth reaches a certain depth (a depth at which OSV can travel in the area), wildlife typically moves to other areas. Therefore, BLM has changed the decision to accommodate both OSV use and protect wintering wildlife for the Proposed RMP: The new decision for Alternative C/Proposed RMP will be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses.

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Recreation	Colorado Snowmobile Association	Page 4-165: 4.4.3 Impact on Recreation (first paragraph) - there is once again a long list of very specific "recreational uses within the RMPPA" that fails to include snowmobiling.	Language concerning the impacts of snowmobile use under the various management alternatives has been revised and increased in the Proposed RMP/Final EIS.
Recreation	Colorado Snowmobile Association	IMPORTANCE OF CROSS-COUNTRY TRAVEL TO SNOWMOBILERS This document fails to recognize and consider the importance of cross-country travel in respect to the desired recreational experience sought by snowmobilers. Management of the activity of "snowmobiling" should not focus only upon the management of snowmobiling/OSV trails. While good trails are extremely important, all too often they are improperly used as the sole measurement of snowmobiling opportunities and management. Rather, where appropriate, there should also be diverse opportunities for cross-country, off-trail riding, climbing, exploring, and adventure since all are of paramount importance to the overall snowmobiling experience.	BLM re-examined OSV use and its impacts in the Proposed RMP/Final EIS. BLM still has concerns that OSV travel could disturb animals during critical time periods (winter months). However, when snow depth reaches a certain depth (a depth at which OSV can travel in the area), wildlife typically moves to other areas. Therefore, BLM has changed the decision to accommodate both OSV use and protect wintering wildlife for the Proposed RMP: The new decision for Alternative C/Proposed RMP will be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. However, BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses.
Recreation	Janet Hansen	I think that motorized recreation needs to be strongly restricted because of the damage to the soil, plants and habitat, and how motorized recreation ruins the land for other recreational uses (hiking, backpacking, camping).	The Draft RMP/EIS evaluated a wide range of options in detail to assure a balanced approach was recommended that allows opportunities for non-motorized and motorized uses. The management actions proposed under the Proposed RMP (Alternative C) will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of all user groups and recreation opportunities. Some portions of the planning area are closed to OHV use while other sensitive areas are limited to designated roads and trails. Camping is also regulated with respect to water locations and areas could be closed to camping if resource damage occurs. Special recreation use permits within the planning area must also be consistent with the plan objectives prior to

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			any actions.
Recreation	Chad Kurtenbach	The second parcel is T4N, R87W, sections 35, 36. I like the non motorized experience this area provides but would like it further if there were no commercial hunting outfitters permitted in the area. The area receives extensive public use during the hunting season without a commercial outfitter. I think the outfit (WW outfitters) that was permitted the last few years now is gone but the impact that operation had still exists including some camp tables and trash that are left and a sawed out trail that they built.	The management actions within the Proposed RMP (Alternative C) will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of all user groups and recreation opportunities. Closing or discouraging commercial outfitter camps on BLM land may reduce impacts on site-specific locations that receive heavy use during the hunting season. However, this action would eliminate management flexibility and opportunities for guided recreational hunting opportunities. Addressing such site-specific restrictions, as well as monitoring impacts and use, is better performed on a case-by-case basis and not in a landscape level planning document.
Recreation	Moffat County Commissioners	p.2-79 Special Recreation Management Areas 1) General Comment: Moffat County understands that Sand Wash SRMA has support of the motorized recreation community. BLM has defended the need for SRMA status on Cedar Mountain. However, BLM has not justified the need for SRMAs on Cold Springs Mountain nor Dinosaur North. Moffat County believes these are two special designations that accomplish little to nothing in addition to the management alternatives already lined out. We request Cold Springs and Dinosaur North SRMAs be removed from Alternative C. Moffat County's request is consistent with how BLM handled ACECs that didn't offer additional protection to existing management.	The Draft RMP/EIS considered the Cold Spring Mountain and Dinosaur North SRMAs in Alternative D, but they were not included in the Preferred Alternative (Alternative C). This ensured a full range of alternatives was considered in developing the Proposed RMP/Final EIS.
Recreation	Moffat County Commissioners	2) Moffat County requests that language be added to reflect SRMAs must not diminish livestock sustainability nor the ability to conduct range improvements. Livestock permits were in place long before SRMA designations and we request the RMP articulate the consistency of range improvements with SRMAs.	Inserting a statement requiring BLM to employ management to “not diminish livestock sustainability” would eliminate management flexibility and limit the capability to manage for any use other than livestock grazing. The Little Snake RMP determines the allowable uses of the public lands as provided for in FLPMA. FLPMA states in Section 202(a) that land use planning provides for the use of the public lands “regardless of whether such lands previously have been classified, withdrawn, set aside, or otherwise designated for one or more uses”. FLPMA further provides in Section 202(e) the authority to issue management decisions which implement newly developed or revised land use plans. Such decisions, including those that exclude one or more uses, are

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			subject to reconsideration, modification and termination through revision of the land use plan. According to Section 2 of the Taylor Grazing Act, it is the objective of the act to regulate the occupancy and use of the Grazing Districts and to preserve these lands. The Grazing Districts were established through a classification system established in the Taylor Grazing Act. Under FLPMA, uses of the land are allocated during the land use planning process. The combinations of uses proposed in the Proposed RMP/Final EIS are varied and diverse across the planning area, taking into consideration the current and future needs of the public. This is consistent with both FLPMA and the TGA. It is important to note that livestock grazing permits do not have the same legal standing as valid existing mineral rights. Livestock grazing is implemented according to terms and conditions associated with grazing permits, which can be modified during the permit renewal process. Terms and conditions on a grazing permit could include strategies to reduce resource impacts or conflict with other resources, including recreation. However, such terms and conditions would be developed on a case-by-case basis in response to site-specific issues. Permittees will continue to hold preference to grazing permits on the allotments allocated for livestock use within the RMPPA and proper notice will be given under 43 CFR 4160 if any change to their permit is taken.
Recreation	Moffat County Commissioners	p.2-91 Dinosaur North Special Recreation Management Area Moffat County requests BLM change to Alternative A for the Preferred Alternative regarding Dinosaur North. We request that since there are so few 'designated' routes in Dinosaur North that BLM not commit to designated routes until a Travel Management Plan is complete. In the meantime we request that Off Highway Vehicles be managed under 'existing routes' until Travel Management Planning occurs. Although this may be implied, it is a hot-button topic that warrants clarification in the RMP.	The commenter incorrectly assumes that Alternative A OHV management for the Dinosaur North SRMA is limited to existing routes. The Draft RMP/EIS notes, on page 2-91, that the existing OHV management in this area is open to OHV use. This means that OHV use is not restricted to any route or area, but can travel cross-country. Continuing to apply such management in the face of increasing OHV use would result in impacts to a variety of resources and uses (see chapter 4 of the Draft RMP/EIS). Further, a collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. The Proposed RMP/Final EIS has been clarified to note

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			that within five years of the completion of the RMP Record of Decision, a collaborative transportation planning process will establish a comprehensive designated route system for all areas where OHV use is limited to designated or existing roads and trails. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. This transportation planning will be prioritized such that sensitive areas will be completed first. Some areas of the RMPPA have already undergone a route designation process, with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes.
Recreation	Moffat County Commissioners	p.2-92 Cold Springs Area Special Recreation Management Area Moffat County recommends that right of way avoidance areas be removed from Cold Springs Mountain since wind energy would be allowed. Transportation lines will be necessary to transport electricity from wind generators.	Given that the Cold Spring Mountain area would be managed to protect naturalness, and outstanding opportunities for primitive recreation, and solitude under the Proposed RMP (Alternative C), continuing to avoid ROWs, even in the face of addressing wind energy applications on a case-by-case basis, provides for more consistent management. It is also important to note that an avoidance area does not preclude development of transportation lines, but it would increase scrutiny of such a development to ensure the resources being avoided were mitigated to the extent possible. Additionally, Alternative D analyzes the impacts of closing the area to all ROWs, and Alternative A analyzes leaving the entire area open for ROW development. A full range of alternatives was considered, and the Proposed RMP (Alternative C) provides for protection of wilderness characteristics while allowing the potential for some development.
Recreation	Rocky Mountain Recreation Initiative	We are also concerned that only Zone 2 of the Serviceberry SRMA is closed to ORVs (DEIS, pp. 2-89). Almost nothing in the resource area protects primitive recreation experiences. All the other SRMAs designated in the preferred alternative (Little Yampa Canyon SRMA, Juniper Mountain SRMA, Cedar Mountain SRMA, and South Sand Wash SRMA) allow motorized use on designated trails or are open to cross country travel.	Under the Proposed RMP (Alternative C), OHV use in the Serviceberry area would be closed in Zone 2, or the backcountry area to allow for a primitive experience away from disturbances from other recreation users. In order to allow access through Serviceberry on county roads, OHV use would be limited to designated routes in Zone 1, which

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			includes the Willow Creek access (Moffat County Road 70) and north Serviceberry access (Moffat County Road 2). These areas are shown as thin green lines on Map 2-47. No motor vehicle use off these roads would be allowed, so the anticipated impact to primitive recreation would be negligible. Additionally, the commenter is only reviewing SRMAs in seeking management that protects primitive recreation experiences. Under the Proposed RMP (Alternative C), nearly 6% of the RMPPA would be managed WSAs, with an additional 14% being managed specifically to protect wilderness characteristics outside WSAs. This also does not include the vast expanses that are managed to protect unfragmented wildlife habitat, which could also be used for primitive recreation experiences.
Recreation	Gerald Rudolph	During the summer, hiking and camping should be allowed but camping places should be set up only in areas approved by the BLM to lessen fire danger.	The alternatives proposed provide SRMAs where hiking and camping are included in the recreation experiences. Campsite conditions and use would be monitored in these areas. Lands that are considered ERMAs would require only limited management. However, BLM would provide information on public health and safety and foster better understanding of safety hazards and risks associated with recreation activities. BLM, in coordination with other agencies and local governments, instates fire restrictions when warranted by local conditions. These fire bans would apply on BLM managed lands.
Recreation	Robert Steele	Alternates C and D for the Little Snake Resource area are far too restrictive to allow the full concept of multiple use to be effective for the citizens of the area and the nation. I object to: Of the five Special Recreation Management Areas, most are hardly pristine enough to warrant special attention.	Special Recreation Management Areas (SRMA) do not have to be pristine to warrant special attention. As defined in the Glossaries of the Draft RMP/EIS and BLM's planning handbook, a SRMA is a public lands unit identified in land use plans to direct recreational funding and personnel to fulfill commitments made to provide specific, structured recreation opportunities.
Recreation	Timberline Trailriders, Inc.	Demographics: While it is generally set forth in the Draft, it should be noted that the vast majority of recreational use of the Little Snake plan area involves motorized recreation –motorcycles, ATV's and jeeps – all utilized for recreation unto themselves, as well as associated camping, sightseeing, exploring, etc. Grazing is no doubt	OHV use is one of the fastest growing recreation opportunities in the RMPPA, but has the potential to conflict with other recreation uses, such as hiking, biking and equestrian use, which use many of the same roads and trails. In addition, many recreation

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		the second primary use, with oil and gas development soon to reach greater levels. We have observed few hikers and a small number of mountain bikers. The point is that all facets of the RMP should not be driven by hypothetical issues raised by groups that rarely recreate in the area.	experiences require quiet and solitude, such as backcountry experience or wildlife viewing. OHV use in the same area can frighten away wildlife and create noise across great distances. There are Special Recreation Management Areas where OHV use is open or limited to designated routes. The management actions proposed under the Proposed RMP will offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels of all user groups and recreation opportunities. Some portions of the planning area are closed to OHV use while other sensitive areas are limited to designated roads and trails.
Recreation	Timberline Trailriders, Inc.	Serviceberry: We suggest that motorized use be seasonally limited to the hunting seasons instead of imposing a yearlong closure.	Under the Proposed RMP (Alternative C), only OHV use in the Serviceberry SRMA Zone 2, or the backcountry area, would be closed to OHV use. OHV use in Zone 1 (Willow Creek and north Serviceberry areas) would be limited to designated routes year-round. Allowing seasonal OHV use throughout the entire SRMA would not be consistent with the SRMA objectives under the Proposed RMP (Alternative C).
Recreation	Wilderness Society (The), et. al.	BLM also failed to balance motorized recreation with quiet, traditional, human-powered recreation. Only Zone 2 of the Serviceberry SRMA is closed to ORVs and designated for those seeking a non-motorized experience. Draft RMP, p. 2-89. The other SRMAs designated in the preferred alternative (Little Yampa Canyon SRMA, Juniper Mountain SRMA, Cedar Mountain SRMA, and South Sand Wash SRMA) allow motorized use on designated trails or are open to cross country travel. None of the areas identified in the Citizens' Wilderness Proposal are designated as primitive recreation SRMAs in the Preferred Alternative.	BLM strives to maintain a balance between motorized recreational activities with non-motorized recreational activities. The Draft RMP/EIS evaluated a broad range of alternatives of opportunities for non-motorized and motorized uses. The alternatives evaluated closing areas to OHV use on a range from 4% (Alternative B) to over 21% (Alternative D), not including other area limitations for OHV use, such as limiting use to existing roads and trails, or seasonally. Additionally, the commenter is only reviewing SRMAs in seeking management that protects primitive recreation experiences. Under the Proposed RMP (Alternative C), 7% of the RMPPA would be closed to all OHV use. Nearly 6% of the RMPPA would be managed as WSAs, with an additional 14% being managed specifically to protect wilderness characteristics outside WSAs. While some of these areas would allow for OHV use along designated routes, these areas were found to have wilderness characteristics with some few routes

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			within them. These percentages also do not include the vast expanses of the RMPPA that would be managed to protect unfragmented wildlife habitat, which could also be used for primitive recreation experiences. As illustrated in Map 2-47, the only areas of the Serviceberry SRMA which are limited to designated roads and trails are the two Moffat County road corridors which run through the SRMA. The management actions proposed under the Proposed RMP offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels use and a variety of recreation opportunities.
Recreation	Wilderness Society (The), et. al.	While the BLM's goals and objectives in regards to recreation are laudable, BLM's plan fails to provide a diversity of recreation opportunities or to make decisions which protect or preserve primitive and semiprimitive areas. Instead, BLM prioritized motorized recreation in the preferred alternative. Only 1 zone within the 5 SRMAs (Zone 2 of the Serviceberry SRMA) is designated to protect non-motorized recreation opportunities by closing the area to motorized vehicles. Alternative D, on the other hand, would designate a total of 9 SRMAs of which 4 SRMAs and a portion of another would be focused on protecting non-motorized recreation by closing the area to off-road vehicles. The Draft RMP acknowledges the likely effects of the Draft RMP on recreation: Restrictions on surface disturbing activities and adaptive management of many resources would reduce impacts on recreation and provide opportunities for motorized, developed, and primitive/unconfined recreation opportunities; however, significant impacts would still occur on non-motorized recreation and recreational users seeking solitude and primitive/unconfined recreation opportunities because of degradation to the natural character from the high potential of new mineral leasing and user conflicts from allowing OHV use on designated routes and trails in the Vermilion Basin area. Draft RMP, p. 2-227. This approach to managing the recreation resource has foreclosed quality primitive and unconfined recreation opportunities. Recommendations: Recreation has become one of the most important uses of the public lands. BLM should commit to and conduct comprehensive recreation planning to ensure that recreation opportunities are assessed and balanced, quality	BLM strives to maintain a balance between motorized recreational activities with non-motorized recreational activities. The Draft RMP/EIS evaluated a broad range of alternatives of opportunities for non-motorized and motorized uses. The alternatives evaluated closing areas to OHV use on a range from 4% (Alternative B) to over 21% (Alternative D), not including other area limitations for OHV use, such as limiting use to existing roads and trails, or seasonally. Additionally, the commenter is only reviewing SRMAs in seeking management that protects primitive recreation experiences. Under the Proposed RMP (Alternative C), 7% of the RMPPA would be closed to all OHV use. Nearly 6% of the RMPPA would be managed as WSAs, with nearly an additional 14% being managed specifically to protect wilderness characteristics outside WSAs, though not as SRMAs. While some of these areas would allow for OHV use along designated routes, these areas were found to have wilderness characteristics with some few routes within them. These percentages also do not include the vast expanses of the RMPPA that would be managed to protect unfragmented wildlife habitat, which could also be used for primitive recreation experiences. Recreational use of the public lands is not limited to SRMAs. As illustrated in Map 2-47, the only areas of the Serviceberry SRMA which are limited to designated roads and trails are the two Moffat County road corridors which run through the SRMA. The management actions

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		recreation experiences are provided. BLM should adopt Alternative D as its proposed plan in regards to Recreation Management. Alternative D balances motorized recreation with protection of quiet, traditional, human-powered recreation opportunities. Most Americans enjoy traditional forms of recreation such as hiking, birding, camping, and backpacking and the LSFO RMP should protect these opportunities.	proposed under the Proposed RMP offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels use and a variety of recreation opportunities.
Recreation	Wilderness Society (The), et. al.	B. The RMP should use the Recreation Opportunity Spectrum (ROS) to classify and manage quality recreation experiences In order to ensure the continued viability of these desired experiences, the BLM's Land Use Planning Handbook recommends BLM use the ROS tool when designating Special Recreation Management Areas (SRMAs) (H1601-1, Appendix C, pp. 16). The Draft RMP fails to specifically mention ROS, or to delineate areas as Primitive, Semi-Primitive non-motorized, Semi-Primitive motorized, Roaded Natural, Rural, or Urban. This leads to confusion as to the purpose of each SRMA. For instance, the Draft RMP's explanation of the Little Yampa/Juniper Canyon SRMA (Draft RMP, pp. 2-79 – 2-82) never delineates ROS class, and therefore there is confusion as to whether Zone 2 would be managed as Roaded Natural or Semi-Primitive Motorized in the preferred alternative. Increasing recreation pressure dictates the need to include more lands within ROS classes that protect the land's undeveloped, wild character, i.e. primitive and semi-primitive non-motorized recreation classes. These designations allow for multiple activities of the sorts most desired by the public: camping, picnicking, hiking, climbing, enjoying scenery, wildlife or natural features viewing, nature study, photography, spelunking, hunting (big game, small game, upland birds, waterfowl), swimming, fishing, and non-motorized river running. Recommendations: BLM should delineate ROS class across the Resources Area. All lands within WSAs, lands with wilderness characteristics outside of existing WSAs, and backcountry areas should be managed as ROS class primitive and as primitive recreation SRMAs, important wildlife habitat and ACECs should be managed as ROS class primitive or semi-primitive, non-motorized.	The commenter is incorrect that the most recent BLM planning handbook (BLM-H-1601-1, released 3/11/2005) recommends that ROS be used when designating SRMAs. The handbook states that the RMP should "prescribe recreation setting character conditions required to produce recreation opportunities and facilitate the attainment of both recreation experiences and beneficial outcomes" for each SRMA and Recreation Management Zone. The handbook states that "the recreation opportunity spectrum is one of the existing tools for both describing existing setting character and prescribing desired setting character." The important issue to address, then is not the use of ROS, but the prescription of recreation setting characteristics. The Draft RMP/EIS completes this using terminology such as front, middle, and backcountry, which is more consistent with BLM's benefits based recreation management program. Each SRMA has language defining the recreation setting characteristics, as is required by the handbook.
Recreation	Wilderness Society (The), et. al.	We support the Draft RMP's approach to establishing special recreation management areas in the lands governed by the LSFO RMP, which is consistent with the Land Use Planning Handbook (in Appendix C and as further defined in the Glossary). However, once again, BLM prioritized motorized recreation over quiet, traditional,	The Draft RMP/EIS evaluated a broad range of alternatives of opportunities for non-motorized and motorized uses. The alternatives evaluated closing areas to OHV use on a range from 4% (Alternative B) to over 21% (Alternative D), not including other area limitations for OHV use, such as limiting use to

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		human-powered recreation. BLM has recently issued a directive for implementation of its Unified Strategy on Recreation and the Colorado BLM is in the process of completing its own Recreation and Visitors Strategy. The agency has recognized the importance of identifying and providing quality recreation experiences on our public lands. In some cases, it is appropriate to provide motorized recreation opportunities, however, BLM failed to identify sufficient non-motorized recreation opportunities in its preferred alternative. In fact, only one zone within the Serviceberry SRMA is specifically designated for the protection of non-motorized recreation opportunities. What follows are our concerns with BLM's analysis and decisions regarding specific SRMAs.	existing roads and trails, or seasonally. Additionally, the commenter is only reviewing SRMAs in seeking management that protects primitive recreation experiences. Under the Proposed RMP (Alternative C), 7% of the RMPPA would be closed to all OHV use. Nearly 6% of the RMPPA would be managed as WSAs, with nearly an additional 14% being managed specifically to protect wilderness characteristics outside WSAs, though not as SRMAs. While some of these areas would allow for OHV use along designated routes, these areas were found to have wilderness characteristics with some few routes within them. These percentages also do not include the vast expanses of the RMPPA that would be managed to protect unfragmented wildlife habitat, which could also be used for primitive recreation experiences. Recreational use of the public lands is not limited to SRMAs.
Recreation	Wilderness Society (The), et. al.	a. Cedar Mountain SRMA Cedar Mountain (900 acres) would be open for ORV use on designated routes in Alternative C, the preferred alternative, and Alternative D (Draft RMP, p. 2-85). However, Cedar Mountain is envisioned as a community niche, offering opportunities for day use picnicking, hiking, jogging, horseback riding, and wildlife viewing. These activities are not consistent with ORV activity and noise coming from ORVs. This area also remains open to oil and gas leasing with an NSO stipulation. Cedar Mountain should be closed to OHV usage and closed to oil and gas leasing.	The Cedar Mountain SRMA has only a few existing routes, which are used to access several ROW communication sites. OHV use is limited to designated routes to accommodate use of these routes for the purposes to accessing the ROWs. With an objective of providing the community a place to recreate close to town, OHV use would be minimized during the route designation process to meet the objectives noted for Alternative C (Proposed RMP). Additionally, the Draft RMP/EIS considered closing the SRMA to oil and gas leasing under Alternative D.
Recreation	Wilderness Society (The), et. al.	b. South Sand Wash SRMA South Sand Wash SRMA (35,510 acres) is intended as a recreation area for ORVs. Zones 1 and 2 would remain available for open travel under the preferred alternative. ORV use in Zone 3 would be limited to designated routes. As mentioned in the Travel Management Section of these comments, the Colorado BLM State Office recently issued IM CO-2007-020, which states that BLM is now expected to "include a system of designated routes" in RMPs. This directive further states that open travel areas should be small, few in number, and should only be designated where it is enforceable. Zones 1 and 2, where open travel would remain open under the preferred alternative, add up to 21,940 acres (Draft RMP, p. 2-104). This area will likely see conflicts between wild horses,	The commenter's recommended approach for Sand Wash Basin (to limit OHV use in areas with any competing values) was applied under Alternative D, which would limit OHV use in the South Sand Wash area to designated roads and trails. The impacts of this were identified in the Draft RMP/EIS.

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		grazing, preserving cultural resources, and ORVs, all exacerbated by "open" use. While IM CO-2007-020 was published after this planning process began, and therefore BLM is not obligated to follow it, BLM should apply the rationale outlined in the IM and restrict open areas to no more than a few hundred acres if at all. All travel in the South Sand Wash SRMA should be solely on designated routes, and in a system designed to minimize impact on cultural and wildlife resources, and livestock grazing operations.	
Recreation	Wilderness Society (The), et. al.	c. Serviceberry SRMA Serviceberry SRMA (12,380 acres) is divided into two zones and would be designated as creating non-motorized hunting opportunities in the preferred alternative. In the preferred alternative, ORV use would be limited to designated routes in Zone 1 and closed to ORVs in Zone 2 (Draft RMP, p. 2-89). During various NWCOS discussions, LSFO staff noted that this SRMA could be used for other forms of primitive back country recreation such as hiking and horseback riding, outside of hunting season. The preferred alternative for Serviceberry leaves the SRMA open for oil and gas leasing and development. Energy development is inconsistent with a designation of primitive, non-motorized recreation and thus, Serviceberry should be withdrawn from leasing for fluid minerals. There is also an inconsistency for other minerals development. Serviceberry is described as open for other minerals activity, but closed to locatable minerals activity and would not be available for coal leasing. Serviceberry is also listed to be considered for ROWs on a case-by-case basis. Allowing ROWs through this SRMA would not be consistent with the goal of managing to protect for primitive, non- motorized recreational experiences. Subject to valid existing rights, the entire area should be withdrawn for all minerals activity, whether fluid or hard and excluded from new ROWs. Further, BLM should specifically state that Zone 2 is closed to ORVs during the entire year, not just during the hunting season.	Under the Proposed RMP (Alternative C), OHV use in the Serviceberry area would be closed in Zone 2, or the backcountry area to allow for a primitive experience away from disturbances from other recreation users. In order to allow access through Serviceberry on county roads, OHV use would be limited to designated routes in Zone 1, which includes the Willow Creek access (Moffat County Road 70) and north Serviceberry access (Moffat County Road 2). These areas are shown as thin green lines on Map 2-47. No motor vehicle use off these roads would be allowed, so the anticipated impact to primitive recreation would be negligible. Alternative C states that Serviceberry would be identified as an SRMA "to provide backcountry, non-motorized hunting experiences," not managed "to protect for primitive, non- motorized recreational experiences" as the commenter states. The potential for conflicts with mineral leasing and development in this area is low. Because of the low potential for activity and mineral development would not be inconsistent with providing non-motorized hunting experiences, there is not a need to preclude mineral activities. Allowing ROWs on a case-by-case basis would require that prior to permitting a ROW, it would have to go through site-specific planning which requires coordination with the RMP. While the area would remain open to ROWs, it would be managed as a SRMA, so consideration for ROW placement would take into account the objectives associated with the SRMA.
Recreation	Wilderness Society (The),	d. Fly Creek SRMA	The commenter's recommended approach for OHV use in the Fly Creek SRMA was applied under

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	et. al.	The Fly Creek SRMA (12,340 acres) is proposed as a primitive, non-motorized back country area for hunting in Alternative D, but unfortunately not in the Preferred Alternative. As with Serviceberry, Fly Creek can be designated for other forms of primitive, non-motorized recreation, outside of the hunting season. The agency is to be commended for proposing to close the area to OHV use, as such a closure is consistent with preserving the traditional, quiet recreational experience. Also, the agency is commended for proposing to develop a non-motorized trails system in this area. However, Fly Creek would remain open to oil and gas exploration and development in this proposal. Again, energy development is not consistent with a designation of primitive, non-motorized recreation. Fly Creek is also listed to be considered for ROWs on a case-by-case basis. Allowing ROWs through this SRMA would not be consistent with the goal of managing to protect for primitive, non-motorized recreational experiences. BLM should designated the Fly Creek SRMA in the proposed plan and withdraw this area, subject to valid existing rights, from mineral activity, whether fluid or hard. Further, BLM should exclude new ROWs.	Alternative D, which would close the area to OHV use. The impacts of this were identified in the Draft RMP/EIS. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP. Neither Alternative C nor D state that the goal for Fly Creek would be “managing to protect for primitive, non-motorized recreational experiences” as the commenter implies. The potential for conflicts with mineral leasing and development in this area is low. Because of the low potential for activity and mineral development would not be inconsistent with providing non-motorized hunting experiences, there is not a need to preclude mineral activities. Allowing ROWs on a case-by-case basis would require that prior to permitting a ROW, it would have to go through site-specific planning which requires coordination with the RMP. While the area would remain open to ROWs, it would be managed as a SRMA, so consideration for ROW placement would take into account the objectives associated with the SRMA.
Recreation	Wilderness Society (The), et. al.	e. Dinosaur North SRMA The Dinosaur North SRMA (45,620 acres) is proposed to provide primitive recreation opportunities such as hiking, backpacking, horseback riding, and camping in Alternative D, but unfortunately not in the Preferred Alternative. The area is proposed for closure to ORVs, which is consistent with the purposes for which the SRMA would be designated. Further, BLM would use its discretionary closure authority and withdraw the area from oil and gas leasing. Finally, this area is identified as an exclusion area for new ROWs, which is consistent with the purposes of the SRMA. BLM should designate the Dinosaur North SRMA in the proposed plan and/or protect the wilderness character of the area as discussed in the section of our comments regarding protection of wilderness characteristics.	The commenter’s recommended approach for OHV use in the Dinosaur North SRMA was applied under Alternative D, which would close the area to OHV use. The impacts of this were identified in the Draft RMP/EIS. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP. Under the Proposed RMP (Alternative C), the area would be managed to protect its wilderness characteristics, but without a SRMA title.
Recreation	Wilderness Society (The), et. al.	f. Cold Spring SRMA The Cold Spring SRMA (30,470 acres) is proposed to provide primitive recreation opportunities such as hiking, backpacking, horseback riding, and camping in Alternative D, but unfortunately not in the Preferred Alternative. The area is proposed for closure to	The commenter’s recommended approach for OHV use in the Cold Spring SRMA was applied under Alternative D, which would close the area to OHV use. The impacts of this were identified in the Draft RMP/EIS. As this decision was analyzed in the Draft

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		ORVs, which is consistent with the purposes for which the SRMA would be designated. Further, BLM would use its discretionary closure authority and withdraw the area from oil and gas leasing. Finally, this area is identified as an exclusion area for new ROWs, which is consistent with the purposes of the SRMA. BLM should designate the Cold Spring SRMA in the proposed plan and/or protect the wilderness character of the area as discussed in the section of our comments regarding protection of wilderness characteristics	RMP/EIS, it is within the decision-range for managers to consider in developing the Final RMP. Under the Proposed RMP (Alternative C), the area would be managed to protect its wilderness characteristics, but without a SRMA title.
Recreation	Wilderness Society (The), et. al.	g. Vermillion Basin SRMA The Vermillion Basin SRMA (77,080 acres) is proposed to provide primitive recreation opportunities such as hiking, backpacking, horseback riding, and camping in Alternative D, but unfortunately not in the Preferred Alternative. The Vermillion Basin SRMA should be expanded to take in the full citizen-proposed wilderness inventory of 86,569 acres as described in the attached Citizens' Wilderness Proposal. The area is proposed for closure to ORVs which is consistent with the purposes for which the SRMA would be designated. Further, BLM would use its discretionary closure authority and withdraw the area from oil and gas leasing. Finally, this area is identified as an exclusion area for new ROWs, which is consistent with the purposes of the SRMA. BLM should expand the Vermillion Basin SRMA to 86,569 acres and designate it in the proposed plan and/or protect the wilderness character of the area as discussed in the section of our comments regarding protection of wilderness characteristics.	The commenter's recommended approach for OHV use in Vermillion Basin SRMA was applied under Alternative D, which would close the area to OHV use. The impacts of this were identified in the Draft RMP/EIS. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for managers to consider in developing the Proposed RMP/Final EIS. Under the Proposed RMP (Alternative C), the area would be managed to protect its wilderness characteristics, but without a SRMA title. This would include closure to oil and gas leasing, as well as VRM Class II and a ROW exclusion area. However, OHV use would be limited to designated roads and trails in part of the Basin. OHV use along existing routes would result in the short-term impact to wilderness characteristics, but because the area was found to have wilderness characteristics with the routes present and open, the continued use of OHVs along the routes would not impact the long-term naturalness of Vermillion Basin. As part of BLM's wilderness characteristics inventory maintenance for Vermillion Basin, BLM performed a combination of data and on-site reviews, as necessary. This review took into consideration the entire area proposed by the commenter. No new information was submitted that either has not already been considered in BLM's wilderness characteristics inventory maintenance process or that BLM has found to identify additional lands with wilderness characteristics. BLM is confident of the approach used to inventory the public lands and stands by its findings, particularly the findings that involved

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			wilderness characteristics inventory maintenance.
Recreation	Wilderness Society (The), et. al.	h. Additional Potential SRMAs and/or Special Management Prescriptions In addition to designating the above SRMAs (with improvements) in its proposed plan, BLM should consider designating additional SRMAs or providing special management for additional areas with primitive recreation values. In order to provide a balance of opportunities between motorized and non-motorized recreation, the agency should close the WSAs and Citizen-Proposed Wilderness areas to ORVs and other vehicular travel except for administrative purposes and maintenance of existing rights. The Agency should consider the areas east of Antone Gap and north of County Route 72, towards Diamond Mountain; and northwest of Antone Gap, towards Middle Mountain; as potential sites for primitive, non-motorized recreation including hunting, hiking, horseback riding, wildlife viewing, and closed to OHV use.	A SRMA designation is not necessary to provide for primitive recreation opportunities. Under the Proposed RMP (Alternative C), 7% of the RMPPA would be closed to all OHV use. Nearly 6% of the RMPPA would be managed as WSAs, with an additional 14% being managed specifically to protect wilderness characteristics outside WSAs. Combined, that's approximately 20% of the RMPPA being managed for wilderness characteristics. While some of these areas would allow for OHV use along designated routes, these areas were found to have wilderness characteristics with some few routes within them. These percentages also do not include the vast expanses of the RMPPA that would be managed to protect unfragmented wildlife habitat, which could also be used for primitive recreation experiences. Recreational use of the public lands, even primitive recreational use, is not limited to SRMAs. The management actions proposed under the Proposed RMP offer management flexibility to ensure that resource values and uses are protected while allowing for acceptable levels use and a variety of recreation opportunities.
Social and Economic Conditions	Ed Biederbeck	There is no socio-economic analysis of OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling.	See General Comment Response #44
Social and Economic Conditions	Burt Clements	We've been through the expansion of the Monument and I am against any plans on expanding it. We have enough Wilderness study areas, as these have to wait on congress to act on which they haven't done and probably won't. The father expansion or designation of more area is age decimation as we older people want to use this ground can't because of knees hips or other problems. We have 4x4's and off road vehicles we could use to enjoy the sights. By making more you are making it so the young and healthy can use it and we can't. I'm against any more restrictions on the public the true owners of these lands.	Expanding the monument or designating more WSAs is outside the scope of this RMP. The Draft RMP/EIS presents the existing environment and describes the effect of continuing the existing management. The action alternatives present a variety of management decisions to address these impacts. BLM has sought public input throughout the RMP process, and has developed the Proposed RMP (Alternative C) that best addresses the issues while complying with law, regulation, and BLM policy.
Social and Economic Conditions	Colorado Snowmobile Association	INCOME AND EMPLOYMENT PROJECTIONS The Draft EIS failed to analyze snowmobiling on its own merits so therefore affects from closing up to, 861,030 acres to OSVs are missing, understated, or both. The final EIS must include better	See General Comment Response #44

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		information in respect to this issue in order to comply with the requirements of NEPA.	
Social and Economic Conditions	Colorado Snowmobile Association	Planners have made erroneous assumptions in respect to non-motorized recreation replacing displaced motorized recreation. One example is found on page 4-214 in respect to `Impacts on Recreation Sector' where the document erroneously states, "decreased motorized use would occur...but non-motorized recreation would increase by a factor of four based upon an increased emphasis on non-motorized recreation." This planning area is fairly remote and, as noted several places in the document, recreation use is predominately by motorized recreationists. Just because someone within BLM says "we will now emphasize non-motorized recreation in this area" does not equate' to non-motorized use actually increasing - particularly by a factor of four. Additionally, replacing motorized with non-motorized expenditures are not a one-to-one proposition since motorized users spend significantly more per trip than what non-motorized recreationists do. The projections in this section should be scaled back to more realistic numbers that reflect reality versus pie-in-the-sky assumptions.	As noted in the Draft RMP/EIS Table 4-57, Alternative C to Alternative D motorized recreation decreases from 21,673 to 5,575. This is due to the elimination of the open OHV area in the South Sand Wash area, as well as the spring OHV closure of the Sand Wash HMA, which overlaps most of the area where motorized users frequent at a time of high demand. The statement concerning the four-fold increase was inaccurate. The Proposed RMP/Final EIS has been revised to eliminate the error. However, by focusing management to specifically provide for non-motorized recreation experiences, that type of use will increase. Concerning expenditures, the Draft RMP/EIS does acknowledge that non-motorized users in this area spend less than motorized users. The commenter has not presented any new information to warrant revisiting the analysis assumptions.
Social and Economic Conditions	Cook Chevrolet	From a business/economic standpoint the closure of any more roads would hurt our business in several ways. One of our biggest assets in bringing new employees to our dealership is the outdoor lifestyle. We don't have malls, but we do have lots of public land! The access to public lands in NW Colorado is an important recruiting tool for local businesses. The most obvious effect that these closures would have on our business and the local economy would be a loss of tourism. The snowmachine and OHV riders bring a lot of money into our local economy. Our largest single tourism event, hunting season, is intertwined with OHV use. Going out in the mud and snow on rough roads is part of the hunting experience. Our local economy desperately needs to diversify and quit relying 100% on our "energy economy". Tourism can help us diversify.	The socioeconomic impacts of limiting OHV and OSV use are contained in the Proposed RMP/Final EIS.
Social and Economic Conditions	Stanley D. Fox	I see no socio-economic analysis of OSV. This information needs to be addressed if the BLM is going to exclude snow machines.	See General Comment Response #44
Social and Economic Conditions	Nathan Fross	On OHV, the amount of revenue that comes into this community from people using them whether it be riding for fun, hunting, and so on is a very large amount.	The Draft RMP/EIS does estimate the economic benefits of OHV use (page 4-214).

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Social and Economic Conditions	Jerre Guthals	There is no socio-economic analysis of OSV. This analysis needs to be addressed if the BLM is to exclude snowmobiles. I have been a Colorado Resident for 20+ years and have enjoyed snowmobiling for most of those years. As a retired person snowmobiling is one of the winter activities I enjoy most and would like to continue doing so. I live in a small town and 70% of the roads and trails here were closed in the last Forest Plan here and it really damaged the local businesses and tourism.	See General Comment Response #44
Social and Economic Conditions	Spencer Hames	We are an OHV family that travels all over the state in both summer and winter, for outdoor and off road activities. Closing more BLM land in the North West region of the State will only hurt the local business owners. Who depend on us off road folks to bring money into the region.	See General Comment Response #44
Social and Economic Conditions	Dean Haynes	I have read of the proposed restrictions that may be imposed on BLM lands. This would greatly affect the local economies, as I and many others vacation on BLM lands for the purpose of OHV use. These lands are public lands and should remain open to the public, for public use.	Chapter 4 of the Draft RMP/EIS presents the socioeconomic impacts of each alternative, including impacts to recreation- and OHV-related sectors. The Proposed RMP/Final EIS has been modified to include an analysis from the OSV decisions. It is important to note that the Draft RMP/EIS does not close any portion of the RMPPA to public access. The form of access allowed has been addressed in certain areas to resolve issues with natural and/or cultural resources or conflicting land uses, but no area is closed to public access.
Social and Economic Conditions	Chad Henderson	I don't think that shutting off the land is the right way of going about this. You are going to make Moffat County lose a lot of revenue because most of the hunters use this land and roads let alone the public of Craig.	The Draft RMP/EIS analyzes the economic impacts of a variety of restrictions on a variety of recreation opportunities (chapter 4 Section 4.5).
Social and Economic Conditions	Jack Hughes	There is no socioeconomic analysis of OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling.	See General Comment Response #44
Social and Economic Conditions	Independent Petroleum Association of Mountain States (IPAMS)	c. Socio-Economic IPAMS believes the Socio-Economic Analysis in chapter 4 does not fully take into account the economic benefits of oil and natural gas development. For example, in section 4.5.5 there is some discussion on taxes, but the analysis is not detailed enough on the full tax contributions of oil and gas. On page 4-220, it is mistakenly stated that Colorado receives $30-60 million in royalties from the Minerals Management Service. However, in FY2006, Colorado received over $143 million in federal mineral royalties from oil and gas	The Proposed RMP/Final EIS has been revised to report oil and gas royalties for 2004 as $68.4 million. This figure was obtained from the Oil and Gas Economic Impact Analysis. Page “x” of that document shows federal mineral royalties from oil and gas activities in Colorado to be $68,436,710 for 2004. This number was used to maintain data from consistent years.

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		development.	
Social and Economic Conditions	Independent Petroleum Association of Mountain States (IPAMS)	Likewise, the socio-economic analysis should take into account the impacts of land management decisions that will deny access to energy resources. In section 4.4.1.3, page 4-150 – 4-151, the EPCA analysis indicates that up to 2,127,000 barrels of oil and up to 68 billion cubic feet (Bcf) of gas would be in areas closed to leasing, and another 93 Bcf in non-recoverable NSO areas. The full economic impact of this land management decision should include the impact on royalties and severance taxes as well as the impacts on employment, property taxes, indirect economic impacts, etc. The negative impact of Alternative D would be even greater, with over 17 million barrels of oil and 619 Bcf of gas closed to leasing, and another 140 million barrels of oil and over 5 trillion cubic feet (Tcf) in non-recoverable NSO areas. The impacts of these land management decisions are not just to Moffat and Routt counties, but also to the state and nation as a whole, which should be reflected in the analysis as well.	The Draft RMP/EIS analyzes direct, indirect, and induced effects of oil and gas development for each alternative (Section 4.5.2). It also analyzes the loss of property, sales, income and other indirect business taxes, as well as federal mineral royalties and severance taxes due to the decrease in oil and gas development (Section 4.5.5) in Alternative D.
Social and Economic Conditions	Independent Petroleum Association of Mountain States (IPAMS)	Natural gas and oil development must be acknowledged as having important social, environmental, and economic benefits at the federal, state, and local level. These benefits are reduced or eliminated when natural gas and oil development is prohibited or severely restricted. A comprehensive analysis of the socio-economic benefits of natural gas and oil development activities in the area must be included in the review. The RMP should also recognize that federal programs to lease and develop natural gas and oil improve the environment in numerous ways. Not only is natural gas the cleanest fossil fuel, it is also the most efficient and a vital feedstock to new alternative energy sources such as biofuels. Royalty revenues from natural gas and oil development underwrite the conservation of wildlife and habitat, national parks, refuges and recreation areas. In fact, the natural gas, oil and mineral programs on government lands fund virtually all of the conservation and preservation work of the Department of Interior.	The Proposed RMP/Final EIS discusses social and economic benefits associated with oil and gas development in the affected communities. The Proposed RMP/Final EIS also addresses government revenues from oil and gas development, which can go towards a variety of spending sources.
Social and Economic Conditions	Judy Kolb	BLM's final management plan should preserve the social fabric of the local communities and the wild, open landscapes of the region by placing special areas off-limits to drilling and ensuring that any energy development is done in a phased manner that limits negative impacts to our air, our water and the wildlife habitat.	The Proposed RMP/Final EIS, Proposed RMP (Alternative C) includes management stipulations for oil and gas development that will maintain large blocks of unfragmented wildlife habitat. Such habitat will also provide for the open landscapes mentioned by the commenter, as well as limit the impacts on air, water and wildlife habitat. The impacts of Alternative

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			C, as well as the other management alternatives considered, are contained in chapter 4 of the Proposed RMP/Final EIS.
Social and Economic Conditions	Kenneth Kreckel	It should be apparent that recent economics of tight gas sand plays do not preclude the use of directional drilling. However, that very argument is often used to discourage the BLM from mandating its use, even in spite of substantial demonstrated environmental benefit. Why? One problem is that operator's assertions of costs are seldom, if ever, documented in any EIS, DEIS, EA, or other BLM report. Thus there are no means for other stakeholders in our federal lands to evaluate these claims. As a result these claims of prohibitively high costs due to directional technology are seldom challenged, or even analyzed. I submit that these assertions should never be accepted by BLM or others without full and public analysis.	The Draft RMP/EIS requires a operators to meet a performance standard (e.g., surface disturbance limitations) but does not mandate an operator's methodology. This will result in operators developing the best, most economical methodology that meets BLM performance standards. BLM does not contend in the Draft RMP/EIS that directional drilling is cost prohibitive.
Social and Economic Conditions	Frank Marbury	If OHV and snow machine access is further restricted it will force people to spend their time and money elsewhere to the detriment of the Moffat county and Colorado communities	See General Comment Response #44
Social and Economic Conditions	Frank Marbury	There should be no winter access restrictions to the Bears Ears District of the National forest. There are no current problems with winter access and if access is restricted to snow machines, this can cause loss of revenues and even human life if search and rescue operations are not allowed to use machines. Including the specifics that roads are not included in the Final Plan may help eliminate confusion about closures.	The Bears Ears District portion of the planning area is managed by the USFS and is outside of BLM jurisdiction. Management for OSV use has been revised in the Proposed RMP/Final EIS for the Proposed RMP (Alternative C). The revised management links the opening of an area (unless otherwise closed like the WSAs) to snow depth. The impacts from the revised decision, as well as the other decisions, are noted in chapter 4 of the Proposed RMP/Final EIS. Emergency actions are not bound by the same designations as regular use. The authorized BLM officer can issue management exemptions in the case of emergencies, as is done with wildland fire.
Social and Economic Conditions	Moffat County Commissioners	p. 4-199 Impacts on Social and Economic Conditions: 1) Moffat County requests this section include language to address the impacts on the County's economic and social conditions from the WSR segment proposals and the "likely to contain wilderness character" proposals. We expect a significant impact on agriculture and oil and gas exploration for WSR, and significant motorized recreation impacts on the proposed wilderness character areas. We request these issues be flushed out more in this section.	The Draft RMP/EIS includes an adequate discussion of socioeconomic impacts of restrictions on recreation use and oil and gas development from wilderness characteristics or wild and scenic rivers. The commenter has not raised any direct issue to be addressed in the existing analysis. Impacts on agricultural use are already included in the Draft RMP/EIS. Impacts from wild and scenic rivers on

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			water rights have been expanded in the Proposed RMP/Final EIS.
Social and Economic Conditions	Moffat County Commissioners	p. 4-199 Impacts on Social and Economic Conditions 2) Moffat County also requests the impacts to the snowmobile recreationists under the existing snow machine closure proposals. Specifically the impacts of access to Black Mountain should be addressed.	See General Comment Response #44
Social and Economic Conditions	Moffat County Commissioners	p. 4-199 Impacts on Social and Economic Conditions 3) Moffat County requests the impacts from wild horses on other uses such as livestock grazing and OHV use be quantified as a social and economic impact.	The Draft RMP/EIS includes a quantitative analysis in change of recreation expenditures from each alternative. However, the analysis does not parse out the impacts of individual decisions within an alternative. Under Alternative D, recreation expenditures would decrease, partly due to a seasonal OHV closure in the Sand Wash Basin to protect foaling wild horses. The Proposed RMP/Final EIS includes qualitative impacts on livestock grazing from wild horse management, including the designation of a wild horse range and the potential for livestock AUM reduction. However, a quantitative economic analysis is not possible as the amount of potential AUM reduction is unknown.
Social and Economic Conditions	Maria Mosman	This area is not only used for recreational purposes for the locals, but is also a huge source of revenue for the local economy. Tourists, hunters, and fishermen use this area as well. Closing it down would greatly devastate the local economy.	The Draft RMP/EIS analyzes the economic impacts of a variety of restrictions on a variety of recreation opportunities (chapter 4 Section 4.5).
Social and Economic Conditions	Cody Norman	Taking away snowmobiling and all other recreation activities is a spell for disaster in our community, not just for local people, but for many businesses.	See General Comment Response #44
Social and Economic Conditions	NW Colorado Oil and Gas Association	p. 4-124-Impacts to Lands with Wildness Characteristics-The BLM should analysis the impacts to the community and the economy of the community by removing mineral development from these lands. There is also significant impact to other land uses from removing lands from multiple use.	The socioeconomic impacts of limiting oil and gas development are contained in the Draft RMP/EIS (Section 4.5.2).
Social and Economic Conditions	Richard Ott	The closing of areas to OHV will impact local economies to the extent that these areas draw hunters and sightseers to the area.	The Draft RMP/EIS does estimate the economic benefits of OHV use (page 4-214), which stands to reason that closing areas to OHV use that provide benefits will result in a loss of the benefits for those areas. The impacts are noted in the Draft RMP/EIS.

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Social and Economic Conditions	Richard Smith	There is an intrinsic value in natural environments and landscapes that goes far beyond the short-term profits gained by oil and gas development. There is also, though seldom discussed, monetary value in these environments. These natural environments are resources whose long-term value is far greater than the market-driven, limited profits gained by oil and gas. Tourism, quality of life, fishing, hunting, wildlife viewing, camping, hiking- all have short and long term monetary value that is not represented properly. And more importantly, consider the immeasurable 'charitable gift' we can donate to future generations	BLM does recognize the potential importance of non-market values relative to managing for natural values. Non-market values are addressed in the Draft RMP/EIS in chapters 3 (3-166) and 4 (Section 4.5.3).
Social and Economic Conditions	William K. Spicer	Also, when is your draft going to address the socio-economic impact of snowmobiles to this area? I did not see any analysis of socio-economic impact to our communities if snowmobiles are excluded from most of the BLM land.	See General Comment Response #44
Social and Economic Conditions	Jenn Tonso	If the BLM implements one of the present Alternatives or revamps the final plan for the Little Snake from a combination of Alternatives A-D which needlessly or severely restricts motorized recreation, OSV and OHV, there would be a measurable negative socioeconomic effect. It has been with the present management plan that the positive socioeconomic situation has developed.	The Draft RMP/EIS considered a broad range of management alternatives for OHV and OSV use, including continuing the existing management situation (Alternative A), as well as applying a variety of management from decreasing limitations on such use to increasing limitations by various degrees. Chapter 4 of the Draft RMP/EIS addresses socioeconomic impacts from the range of OHV and OSV management alternatives.
Social and Economic Conditions	Joseph Tonso	I have several areas of conflict in your Alternatives B, C and D. 1. The shutdown of most of the lands does not reference the affect on handicapped, aged and infirm users of the Public Lands. No reference is made of who or how the lands can be used, only how they may not be used by those able to physically enjoy the great outdoors. 2. The consequences show what is purported to be the impact by OSV and OHV users, but the impact on Moffat County, Routt County, Craig and Steamboat Springs by the elimination of motorized recreation use and tourism on economic losses is not shown and could be significant. 3. The study conducted by CSU on economic impact was apparently derived from statistics that were not current and certainly not done by local observation or interview of the governments of the affected counties or any people involved in motorized recreation or motorized tourism.	The Draft RMP/EIS does not close most of the RMPPA, as the commenter asserts. The range of alternatives considers closure to OHV use on between 4% (Alternative B) and 21% (Alternative D) of the RMPPA, and OSV closures from 4% (Alternatives A, B and C) to 65% (Alternative D). Within this range there are abundant opportunities for a variety of public land user groups. Impacts of these restrictions to motorized users (which may include handicapped, elderly and infirmed users) were addressed in the Draft RMP/EIS. The socioeconomic impacts of limiting OHV and OSV use are contained in the Proposed RMP/Final EIS. Finally, the impact analysis used the most up-to-date information available, including input from a variety of stakeholders. The commenter provided no new information for consideration in the Proposed

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			RMP/Final EIS.
Social and Economic Conditions	Vermillion Ranch Limited Partnership	Pg 4-3 The assumptions do not include the cumulative impact of BLM decisions on retaining a viable agriculture industry and NEPA requires that it be done. We request that you do!	The Draft RMP/EIS analyzes socioeconomic impacts of the management alternatives on the agriculture sector (Section 4.5.2). In addition, the Draft RMP/EIS contains a discussion of the value of open space, which includes a discussion about the possible conversion of privately held farms and ranches into rural residential properties.
Social and Economic Conditions	Vermillion Ranch Limited Partnership	Pg 4-40 Closing WSA to minerals does not describe loss of value to feds or state and local government. Disclose value!	Closing WSAs to oil and gas leasing was completed by Congress in the Mineral Leasing Act, as amended (30 U.S.C. 226-3(a)). Although closing WSA to oil and gas leasing is not within the RMP decision space and therefore not required to be analyzed under NEPA, the cost of closing areas to oil and gas development is addressed in the Draft RMP/EIS.
Social and Economic Conditions	Vermillion Ranch Limited Partnership	Pg 4-207 We object to the statement that D would increase AUMs. While treatments might make more forage the statement fails to analyze the cumulative impacts in D that would make those AUMs unavailable to the grazing permittees.	The Draft RMP/EIS does not include a decision that allocates forage increases specifically to non-livestock uses under Alternative D. While preferred uses are implied, as in DPC for specific resources, no allocation is made. This is further supported on page 4-207 of the Draft RMP/EIS where Alternative B has a larger increase in livestock numbers that would be associated with a DPC favoring commodity production. Commenter has not noted why the AUMs would be unavailable to grazing permittees in Alternative D.
Social and Economic Conditions	Randy Watson	There is no socio-economic analysis of OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling.	See General Comment Response #44
Social and Economic Conditions	Paul E. Weis	Hunting is crucial to the long term economy of this region. Three thousand wells and associated roads and other construction would unquestionably reduce hunting opportunities and cripple the existing local economy. Mitigation proposals are untested and mostly voluntary; hence they would undoubtedly be ineffective.	The Draft RMP/EIS acknowledges impacts from oil and gas development to amenity-based industries, including hunting (chapter 4 Section 4.5.3). The effects of mitigating oil and gas impacts on wildlife habitat are addressed in chapter 4.
Social and Economic Conditions	Western Watersheds Project	Economic values must be analyzed for each resource use and the costs and benefits accounted for. It is not sufficient to omit consideration of environmental damage, soil loss, water pollution and wildlife values while claiming some subjective lifestyle benefit of having livestock remaining on the ground.	The Draft RMP/EIS includes an analysis of the economic values associated with each resource use. Additionally, the Draft RMP/EIS chapter 4 considers impacts from livestock grazing on other resources.
Social and	Western	Other than asserting in various ways that continued livestock	The Draft RMP/EIS contains an analysis of the

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Economic Conditions	Watersheds Project	grazing at current levels provides for preservation of rural values and lifestyles, BLM or other agencies generally do not provide any economic analysis of the costs and benefits of public lands livestock grazing and its contribution to local and regional economies. They do not analyze the values of uses foregone in favor of livestock grazing and its infrastructure. See the detailed and quantitative analysis by Dr. Power in (Wuerthner and Matteson 2002) that is referenced above. In his analysis of the economies of individual rural counties, Dr. Power showed that federal lands grazing does not contribute significantly to those economies across the west. In fact, given the high percentage of ranching families that have jobs, either full or part time outside the ranch (60 – 70%), it is ranchers that depend on the other economic sectors for their ability to persist, not federal grazing. Dr. Power states, "It is not that towns depend on agriculture, but that agriculture increasingly depends on the vitality of urban and nonagricultural rural economies to provide the nonfarm income that keeps farm operations alive." Dr. Power states that claims about the relative importance of federal grazing to the economies of western states can be analyzed by answering these questions: "1. What portion of the value produced by cattle and sheep operations is associated with feed used? 2. What portion of the feed for those cattle and sheep operations comes from grazing on federal lands? 3. What portion of the total agricultural activity involves raising cattle and sheep? 4. What part of the total economy is represented by agriculture?" You should include consideration and analysis of these sources in your Final EIS and RMP and also provide more analysis of the economic benefits of wildlife through hunting, fishing and wildlife-watching associated recreation. These benefits are summarized in the Fish and Wildlife Service 2001 National Survey of Fishing, Hunting and Wildlife-Watching Associated Recreation (DOI 2002). That survey showed that in Utah alone, expenditures for hunting, fishing and wildlife-associated recreation were $1,143,408,000.00 in 2001. Colorado figures are also available in that report.	contribution of the agricultural industry to the local economy. However, the specific economic viability of the livestock industry or of specific ranchers is beyond the scope of this EIS. As long as a given land use meets the sustained yield requirement in FLPMA, the viability of the industry associated with that use does not directly contribute to BLM's decision-making. Concerning economic benefits of wildlife through hunting and other recreational endeavors, the Draft RMP/EIS includes economic data for hunting and fishing activities from research performed within the RMPPA rather than generalized from a west-wide study (page 3-134). Impacts from hunting and fishing are addressed in Section 4.3.
Social and Economic Conditions	Wilderness Society (The), et. al.	In its assessment of the socioeconomic impacts of the alternatives for the Little Snake RMPPA, the BLM focused almost exclusively on the potential benefits of the alternatives, and specifically on the potential benefits of expanded oil and gas development. At the same time, the agency produced inadequate (or in some cased nonexistent) assessments of the socioeconomic costs associated	The Draft RMP/EIS does include an analysis of the socioeconomic costs associated with the alternatives, and specifically associated with oil and gas (Section 4.5.3, pages 4-215 through 4-218). Although quantification of these impacts to non-market values is difficult without additional data (e.g.,

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		with the alternatives and with expanded oil and gas development. This omission represents a serious flaw in the impact analysis and must be corrected. The BLM has also failed to adequately assess the impacts of the management Alternatives on key sectors of the local economy.	surveys), a qualitative analysis was included in the Draft RMP/EIS so that decision makers may take them into account.
Social and Economic Conditions	Wilderness Society (The), et. al.	Expanded oil and gas development in the Little Snake Resource Area is likely to have extensive and potentially devastating socioeconomic impacts. These impacts need to be included quantitatively in the assessment of overall impacts, not dismissed as unmeasurable or unquantifiable as has been done in the Draft RMP. The dramatic increase in the number of oil and gas wells will result in environmental costs to the surrounding public lands and communities, as well as a much larger area of impact. Peer reviewed methods for quantifying both the non-market and market costs of changing environmental quality have been developed by economists and are readily applicable to the present case. For a catalog of these methods see Freeman (2003). For a complete socioeconomic analysis, BLM should adapt these methods to conditions in the RMPPA to obtain a complete catalog of estimates of the economic consequences of the Alternatives. Make quantitative estimates of the potential socioeconomic costs of expanded oil and gas development as detailed above. See the attached document “The Economic and Social Impacts of Oil and Gas Development” for further information on the costs of oil and gas development.	While a number of costly and time-consuming data collection efforts could have been conducted to support the alternative development and analysis in the Draft RMP/EIS, FLPMA Section 202, (c) (4) states: “In the development and revision of land use plans, the Secretary shall…rely, to the extent it is available, on the inventory of the public lands, their resources, and other values.” The Draft RMP/EIS does include an analysis of the socioeconomic costs associated with the alternatives, and specifically associated with oil and gas (Section 4.5.3, pages 4-215 through 4-218).
Social and Economic Conditions	Wilderness Society (The), et. al.	BLM must recognize the value of public lands for hunting, fishing, other recreation, and as an amenity drawing new businesses and residents into the Little Snake Resource Area. Public lands which are protected from development are a critical source of economic prosperity and stability for Moffat and Routt Counties, as has been demonstrated all over the region (Rasker et. al 2004, Bennett and McBeth 1998, Johnson 2001, Deller et al. 2001, Lorah 2000, Low 2004, Morton 2000, Nelson 1999, Snepenger et al. 1995). Local natural amenities are becoming increasingly important as a driver of Western rural economies. This is occurring at the same time that western economies (including that of Moffat and Routt Counties) are experiencing a trend away from resource-extraction and primary manufacturing. More and more of the jobs and income in rural Colorado are derived from industries in the broadly defined service sector. Technology allows many workers to choose the location of their work and entrepreneurs are increasingly free to choose the location for their businesses. Most of these "footloose" workers and	The importance of natural amenity-based economic activities is specifically addressed several times throughout Sections 3.3 and 4.5 of the Draft RMP/EIS. Although quantification of these impacts to non-market values is difficult without additional data (e.g., surveys), a qualitative analysis was included in the Draft RMP/EIS so that decision makers may take them into account.

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		entrepreneurs select their location based on the amenities the area offers. There is a vast and growing body of research that indicates that the environmental amenities provided by public lands are an important economic driver in the rural West. For several examples, see the peer-reviewed articles cited above, as well as these additional peer-reviewed research papers: Rudzitis and Johansen 1989; Whitelaw and Neimi 1989; Johnson and Rasker 1993, 1995; Power 1995, 1996; Duffy-Deno 1998; Rudzitis 1999; Rasker et al. 2004; Holmes and Hecox 2004. The evidence in this body of research suggests that, even if the estimates of short term economic benefits contained in the Draft RMP are taken as accurate, the long-term effect of accelerated oil and natural gas development could be to place Moffat and Routt counties at an economic disadvantage, because their environmental and social amenities have been compromised. Indeed, a recent study by the USDA has found that counties pursuing a strategy of economic growth based on recreation have enjoyed greater economic growth, lower poverty rates, higher labor force participation rates, and greater improvements in other social indicators than other counties (Reeder and Brown 2005). Estimate the socioeconomic benefits of protecting the public lands in the Little Snake RMPPA.	
Social and Economic Conditions	Wilderness Society (The), et. al.	Retirement and investment income (which makes up the majority of non-labor income) is the largest single source of income in Moffat and Routt Counties. Most people who rely on retirement and investment income are also free to choose where they live, and this demographic segment is also choosing high amenity areas, resulting in growth in populations and income in the West (McGranahan 1999, Shumway and Otterstrom 2001, Lorah and Southwick 2003). Given these trends, it is especially inappropriate that the Draft RMP makes no effort whatsoever to quantify non-labor income or to estimate its role in the local economy. Nor does the Draft RMP evaluate the potential negative impacts that expanding oil and gas development in the Little Snake RMPPA will have on this sector of the economy. Estimate the impacts of non-labor income in the local economy and estimate the potential impacts of the land management alternatives on this sector and the impacts that this will in turn have in the local economy.	The Draft RMP/EIS does quantify the impacts to the local economy of growth created by retiree population (Section 5.4, pages 4-237 through 4-241). Additionally, the Draft RMP/EIS identifies costs to non-market values that may affect non-labor sector individual's decision to move into the area. The Draft RMP/EIS chapter 3, pgs. 3-127 through 3-130, discusses the importance of non-labor income and its potential association with natural amenities. BLM is unaware of any methodology that reliably projects non-labor income and its components in a specific area over a 20 year period, let alone any method that could predict changes in these components likely to result from BLM's action alternatives.
Social and	Wilderness	Furthermore oil and gas development can have many easily	The Draft RMP/EIS does address most of the issues

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Economic Conditions	Society (The), et. al.	quantifiable negative impacts on the economy of the RMPPA which are not accounted for in the Draft RMP. It has been well documented that the current accelerated oil and gas development in the Rocky Mountain region has resulted in greater competition for skilled oil and gas workers. While most of these workers are not supplied from the local area, there may be several potential impacts in Moffat and Routt Counties. First, increased demand for local labor may result in worker shortages for employers outside the oil and gas industry as some workers move to oil and gas jobs. Second, competition for workers may result in increased wage rates, which could burden local employers. Many of these employers are government entities with limited ability to increase wages in order to retain staff. A third potential impact of the dramatically expanded scope of oil and gas development in the Little Snake Resource Area will be an increase in the population in these counties as workers following the rigs move to the area. This increased population will result in increased demand for housing (in turn raising housing prices) and increased demand for public services at a time when these local agencies may be experiencing staff shortages either through increased staffing needs going unmet or migration of labor to the oil and gas industry. The analysis of the economic impacts of expanded oil and gas development must include an examination of the changes in labor and government expenditures, among other costs, that will accrue to the surrounding communities. Increased oil and gas development in the Little Snake Resource Area will result in greater wear and tear on county infrastructure, especially in Moffat County where most of this development is expected to take place. In addition, some infrastructure may need to be expanded in order to meet increasing capacity needs. These costs must be quantified and included in the economic analysis of the alternatives.	raised by the commenter in either chapter 4 (Section 4.5.3) and chapter 3 (Section 3.3.2.1). Analysis addressing costs of worker shortages and increased demand to local infrastructure was added to the Proposed RMP/Final EIS.
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.1 Approach to the Analysis: Several key assumptions stated in this section need to be reevaluated as they are likely to prove untrue which will have a large influence on the level and extent of the impacts of each alternative. First, the assumption that agency funding will be adequate to implement each alternative. Recent research has shown that the BLM has in fact not been able to fulfill its mandated environmental protection requirements (U.S. GAO 2005, Western Organization of Resource Councils 2005). The assumption that “Restrictions or prohibitions on activities in specific areas would protect sensitive resources” (Draft RMP, p. 4-3) may also prove to be untrue, which would have implications for the	It is impossible for BLM to know what budget will be allocated on a year-to-year basis. For the purposes of analysis, BLM must assume that it can implement its plan, for without that assumption there is no information to guide a comprehensive planning process in determining budgetary priorities, which is not an RMP-level decision. Concerning the second assumption in the comment, the assumption is not intended to assume away any impacts on special designations (e.g., ACECs), as the effectiveness of such a designation and the

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		extent and level of impacts of the alternatives. Analysis of the records at two BLM offices has shown that the agency all too often waives stipulations and conditions of approval for oil and gas development (among the "restrictions or prohibitions" included in the assumption). It would seem reasonable to assume that this practice of waivers and exceptions being granted is widespread. Any finding of the impacts of oil and gas drilling should consider the tendency of the agency to waive protective stipulations and evaluate these as if they were not in fact enforced. Given the likelihood that certain assumptions (described above) will not be met, BLM should reevaluate the socioeconomic impacts without these assumptions	associated management is analyzed in chapter 4. Rather, it is to assume the exact scenario the commenter presents: excepting, waiving, or modifying a restriction. Under such conditions, it is assumed that decision modification would not be approved unless the resource the decision was intended to protect would be protected under the altered management. Without such an assumption there would be no difference in the effects of the alternatives, as every decision could result in similar impacts.
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.2 Availability of Data and Incomplete Information This section presents a troubling and rather long list of incomplete information for several major areas which are critical to a complete and accurate assessment of the impacts of the activities proposed in the RMP. These data need to be collected before any assessment of the impacts of the management alternatives can be truly completed. BLM must gather the missing information and data detailed in section 4.2 and reevaluate the socioeconomic and other impacts of the management alternatives with complete information. To do otherwise is a violation of the Data Quality Act.	While a number of costly and time-consuming data collection efforts could have been conducted to support the alternative development and analysis in the Draft RMP/EIS, FLPMA Section 202, (c) (4) states: "In the development and revision of land use plans, the Secretary shall…rely, to the extent it is available, on the inventory of the public lands, their resources, and other values."
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.5 Impacts on Social and Economic Conditions: Table 4-55 on page 4-211 shows the numbers of wells projected under each alternative, adjusted to reflect a "penalty" for more restrictive requirements. How was this "penalty" calculated? What are the sources for the "costs" associated with environmental protections? These inputs need to be documented.	Each oil and gas designation will likely lead to varying drilling costs and will affect the decision of companies about whether to drill. The first is the open lease with standard terms, which is modeled as the "base" for which cost characteristics are reported below. Drilling in areas with this designation offers the lowest costs to operators. The open leases with Controlled Surface Use, listed as the second category in Table 4-55 of the Draft RMP/EIS, was modeled by increasing construction costs by 20%, as these stipulations often require adjustment in location, land preparation or reclamation. There are two categories of seasonal restrictions, 3-6 months and 6-9 months. It is clear that if firms are restricted to drilling during a short period, in the aggregate there needs to be more drilling rigs and crews available to meet that demand. In general, it takes about 20 days to drill a well with a team of 7-10

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			workers, including professional and overhead staff. One crew can then drill about 16-17 wells per year. This means that it would take ten crews to do the 151 wells assumed in this analysis. For the first seasonal designation, we assume that the restrictions are about 4.5 months, the midpoint of the 3-6 month range. This implies that the increases in labor and rigs needed would be about 35%. The availability of these rigs would be factor of how much of a region faces these limits, the general tightness in supply due to national drilling levels, and other factors that are quite difficult to forecast. To implement these restrictions, it is assumed that the prices of rig-related capital and labor increase by one quarter of the increase in the required stock of rigs and workers. This leads to an increase in selected costs of 8.25% for the 3-6 month timing restriction. A similar process would suggest that 7.5 month restrictions on average for the 6-9 month designation would lead to a 17.5% change in those costs. The last three lines show various designations that are continuous through the year. Clearly, no wells will be drilled in those areas with “No Leasing” restrictions. Also, BLM has determined that resources in the unrecoverable No Surface Occupancy areas forces wells to be drilled too far from gas resources to make production uneconomic. The wells desired to be placed in these areas simply will not be attempted. However, the recoverable NSO areas listed in the EPCA table could be potentially accessed by directional drilling but at higher costs. It is assumed that the horizontal and directional drilling required in these NSO areas would increase costs by 36%.
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.5 Impacts on Social and Economic Conditions: The multipliers used throughout the economic analysis for the oil and gas industry are, as asserted by the BLM itself on p. 4-212, “incredible.” Some synonyms for incredible include “hard to believe,” “implausible,” “barely credible,” “absurd” and “far-fetched.” These are apt when applied to the ridiculous multipliers used to boost the apparent importance of the oil and gas industry. Moffat county’s	The Draft RMP/EIS does include an explanation of the high multipliers assumed on oil and gas activities (page 4-212). Further, the explanation does capture the fact that many of the workers are from outside the area. The commenter has not raised any substantive argument refuting the actual explanation contained in the Draft RMP/EIS.

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		economy is too small to warrant a multiplier over 9 (Draft RMP, p. 4-212). It is much more likely that oil and gas workers will remain only temporarily, that the drill rigs will be built in other locations and that the other oil and gas field supplies will also be purchased by out-of-state or out-of-county companies in larger markets. Are these state-level or even regional multipliers? These are not necessarily appropriate for assessing impacts at scale to which they are applied in the Draft RMP. BLM must document the sources for these multipliers.	
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.5 Impacts on Social and Economic Conditions: Text on page 4-213 describes "additional benefits associated with management alternatives." This section attempts to further inflate the apparent benefits of oil and gas drilling by documenting the alleged contributions that this industry makes to the local communities. These numbers must be documented. Furthermore, members of the oil and gas industry are certainly not the only philanthropists in the Little Snake Resource Area. The contributions to the local community, to local colleges and other social and economic benefits of all charitable giving must be documented, as well as the potential impact on these sources of donations if oil and gas drilling drives other philanthropists from the communities of the Little Snake Resource Area.	The Draft RMP/EIS includes a qualitative analysis of the impacts of oil and gas development, both benefits and costs. References have been added to the Proposed RMP/Final EIS for where the information was obtained. Concerning philanthropic efforts in the RMPPA, the Draft RMP/EIS focuses its analysis on groups that use public lands. While BLM is confident that there are a large number of philanthropists that contribute to a wide array of valuable social programs, reporting on all charitable contributions is not within the scope of the EIS. A paragraph noting the contributions of other user groups has been added to the Proposed RMP/Final EIS.
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.5 Impacts on Social and Economic Conditions: The BLM asserts on page 4-213 that "It was not possible to evaluate the impact of the management alternatives on hunting and fishing." This is not true. Numerous studies on the impact of success levels as well as the impact of scenery on hunter preferences have been completed. See Kaval and Loomis (2005) for several citations of studies on the value of hunting and fishing, the economic impacts of hunting and fishing and studies on how the quality of the experience changes these values. See Rosenberger and Loomis (2001) for details on benefits transfer methodologies that can be used to adapt the findings to the potential wildlife impacts in the Little Snake Resource Area. These findings along with the well documented impacts that oil and gas drilling will have on wildlife can and should be used to evaluate these potential impacts to the local economy.	The Draft RMP/EIS does not state that impacts on hunting and fishing could not be identified, but that analysis of the range of management alternatives was not possible. The Draft RMP/EIS does address the impacts from oil and gas development on wildlife and the associated impact on hunting in Sections 4.5.2 and 4.5.3. However, at the RMP stage it is unknown where the disturbances from oil and gas will occur, making any analyses the commenter has suggested unsound and not based on any actual proposed action.
Social and Economic Conditions	Wilderness Society (The), et. al.	Section 4.5 Impacts on Social and Economic Conditions: Table 4-57 presents estimates of projected motorized and non-motorized visitor days for each alternative. How were these numbers derived? It seems unlikely that in a county with a population of less than 15,000	Estimates of motorized and non-motorized visitor days were derived from three sources: (a) expansion of visitor survey estimates from weekend sampling days to all weekends from Spring through early Fall

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		that there will be nearly 30,000 non-residents participating in motorized recreation. The fact that motorized recreation appears to dominate goes against the findings of the two leading comprehensive surveys on American recreation behavior. Both the National Survey on Recreation and the Environment and the National Visitor Use Monitoring Survey conducted by the U.S.D.A. Forest Service indicate that far more people participate in non-motorized recreation than motorized recreation. Furthermore, Stynes and White (2005) find that non-motorized and motorized recreationists spend about the same amount of money per day (with non-motorized users actually spending slightly more). Please document your justification for the far-fetched numbers shown in this table as well as the assertion that non-motorized user exhibit "…lower spending per user." (Draft RMP, p. 4-214).	(this assumes no use during the week to be conservative); (b) Colorado State Parks visitation data at their fee sites; (c) BLM's Recreation Management Information System (RMIS). Based on discussions between Colorado State University (CSU) professors who were contracted to prepare the socioeconomic analysis and the BLM interdisciplinary team, we choose to use State Parks visitation data when that was less than the estimate from the visitor survey in (a). At sites where we did not have State Parks visitation data, to be conservative we scaled down the visitor use estimates from sample expansion in (a) based on State Park visitation estimates where we had both visitor survey and State Parks data. For low visitation sites we relied upon RMIS data. While the studies cited by the commenter might hold true for some areas, including urban National Forests and other urban public lands, Craig, Colorado is quite rural. In addition, Sand Wash Basin is one of the few remaining places on public land were OHVs are not restricted to existing roads and trails making it a particularly attractive destination. CSU's expenditure profiles are based on site-specific data for 20 days of sampling of Sand Wash visitors and visitors to the other BLM recreation sites. Stynes and White's results are National Forest averages, based on data collected across all National Forest sites. Generally speaking, it is usually preferred to use site specific expenditure information rather than national averages for a different type of public land.
Social and Economic Conditions	Wilderness Society (The), et. al.	Residents' quality of life also suffers during accelerated oil and gas development. These costs must be accounted for in the analysis. Surveys of residents in Western communities indicate that people choose to live in this region because of the scenery, recreation, lifestyle, and clean air and water rather than economic factors such as jobs or low taxes (McLeod et al. 1998, Porter et al. 2004). These amenities are diminished when oil and gas drilling increases in pace and scale. The loss of amenities and the economic impacts created by this loss must be acknowledged and accounted for in the analysis for the Little Snake Resource Area, and especially the potential increased costs associated with rapid drilling such as described in	The Draft RMP/EIS does address most of the issues raised by the commenter in either chapter 4 (Section 4.5.3) and chapter 3 (Section 3.3.2.1). Analysis addressing costs of worker shortages and increased demand to local infrastructure was added to the Proposed RMP/Final EIS.

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		Section 4.6. Costs to local governments include added strain on infrastructure, increased road maintenance costs, increased demand for public services such as hospitals and schools, increased need for emergency services (due both to increased population and an increase in the number of people working in more dangerous occupations such as those found in oil and gas extraction), and a host of less tangible costs due to the effects of a changing demographic and social makeup of the towns and communities (Morton et al. 2002). For example, increased truck traffic results in increased road maintenance costs (Pinedale Anticline Working Group 2005). Increased traffic also results in dust from poorly constructed access roads which causes health problems for both humans and livestock, reduces the grass available for cattle, and negatively impacts air quality and visibility. Crime and other social problems intensify in boomtowns, with these areas seeing increases in larceny, traffic violations and accidents, destruction of private property, family violence and child abuse. Oil and gas workers facing long shifts and time away from families often turn to drugs. All of these escalating problems increase the cost of emergency and social services for cities and counties. Boomtowns also often experience a shift in the labor force. Workers leave for oil and gas jobs, resulting in instability in the labor force and difficulty hiring public workers (e.g. policemen, firemen) at a time when the counties and cities are stretched thin to handle the increased workload (Pederson Planning Consultants 2001). In the Pinedale Anticline area of Wyoming, emergency calls more than doubled between 2000 and 2003, while ambulance runs increased by 36% since oil and gas drilling has accelerated. Traffic and automobile accidents have also increased in conjunction with oil and gas drilling. One major intersection in Sublette County saw traffic rates nearly triple between 1995 and 2003. After declining in the mid 1990's, accident rates per capita increased 23% between 1999 and 2003, and this increase mirrors the increase in drilling rigs in the area (Pinedale Anticline Working Group, 2005). These social problems are more severe with more development and the BLM completely ignores these costs in its analysis of the potential impacts of rapid drilling. When estimating the benefits of rapid oil and gas development in the Little Snake RMPPA, the BLM must show these benefits as net rather than gross (that is these analyses should reflect the costs as well).	

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Soil Resources	Rick Hammel	Alternative A does not take into consideration new technologies that reduce surface disturbance, particularly in road construction. US Dept of Energy (DOE) has awarded Texas A&M University's Global Petroleum Research Institute (GPRI) and Nobel Technology Service Division (NTSD) funding to develop a Joint Industry Partnership (JIP) to develop Environmentally Friendly Drilling (EFD) concepts. Briefly, one of the products that have come out of this research is "disappearing roads." The roads are transported to the drill sight and are rolled out to form a "road." This concept is extremely important in fragile soils and fragile vegetation. After the drilling is completed, the "road" is rolled back up and trucked away.	The language in Alternative A was obtained from the 1989 Little Snake RMP and ROD and is not subject to revision within Alternative A. While the Draft RMP/EIS Alternatives C and D were the same as Alternative A, they have been revised in the Proposed RMP/Final EIS to be the same as Alternative B. Therefore, under Alternatives B, C (Proposed RMP), or D, a variety of COAs or BMPs could be considered to reduce impacts to soils, including those identified by the commenter. These would be considered on a case-by-case basis during implementation of the RMP.
Soil Resources	Moffat County Commissioners	p. 3-15 Fragile Soils: The last sentence of the second paragraph states 'biological soil crusts are very important to these soils.' Moffat County suggests removing this sentence from the RMP as for every piece of science that says biological crusts are important in decreasing wind erosion in some areas, there is one stating how biological crusts reduce rangeland productivity and existing uses protect the soil better than biological crusts. By stating that they are important implies that they should somehow be protected, and thereby minimizing good range management practices.	The sentence in the Draft RMP/EIS is not a general conclusion to be associated with every soil type, but in specific reference to fragile soils. Due to the highly erosive nature of fragile soils, the presence of biological soil crusts help hold soil particles together and reduce wind and water erosion. Without such crusts, fragile soils would be more susceptible to erosion. Because the presence of biological soil crusts may reduce rangeland productivity doesn't negate the validity of the initial claim. Beyond this, the commenter has not identified or provided any scientific evidence to support their claim.
Soil Resources	Moffat County Commissioners	p. 3-16 Important Farmlands: Moffat County requests this section acknowledge the prime farmlands are on private property because of the homestead history in Moffat County and that BLM allotments are dependent upon the prime and unique private farmlands for sustainability.	The commenter is incorrect in the assumption that all the prime farmlands in Moffat County are on private property. Draft RMP/EIS Map 3-4 has been revised to include BLM surface estate along with the categories of prime farmlands. Based on this revision, it is evident that the various categories of prime farmlands occur on both BLM and non-BLM lands.
Soil Resources	Moffat County Commissioners	p. 4-10 Soil Resources: Moffat County requests BLM clarify that long-term management of land uses can actually stabilize soils and result in positive benefits. The entire section is dedicated to short-term disturbances and improperly managed land uses disturbing soil.	Long-term impacts to soils, including maintaining soil resources and increased protection against wind and water erosion, are discussed throughout the soils section (for a few examples, see page 4-10, end of second paragraph after bullet list; 4-12, first paragraph; third paragraph on page 4-12 and continued in the first paragraph on page 4-13; page 4-14, second paragraph, etc.) It is also important to note that the analysis is limited to actions contained in the various alternatives and does not analyze the

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			application of improper management actions.
Soil Resources	Questar, Rockies Region	Page 2-9, Section 2.5.2.2: Initiate reclamation of disturbed surfaces before November 1 each year. Clarify that wells drilled late in the season or which are drilling over November 1 would not be reclaimed until the following year.	The language in Alternative A was obtained from the 1989 Little Snake RMP and ROD and is not subject to revision within Alternative A. While the Draft RMP/EIS Alternatives C and D were the same as Alternative A, they have been revised in the Proposed RMP/Final EIS to be the same as Alternative B. Therefore, there is no language remaining in the Proposed RMP/Final EIS that is able to be revised as suggested by commenter.
Soil Resources	Questar, Rockies Region	Page 2-9, Section 2.5.2.2: Before reserve, production or emergency pits are reclaimed, remove all residue and truck it offsite to an approved disposal location. Clarify that once the pit is dry, dried cuttings may be left in place and the pit closed.	The language in Alternative A was obtained from the 1989 Little Snake RMP and ROD and is not subject to revision within Alternative A. While the Draft RMP/EIS Alternatives C and D were the same as Alternative A, they have been revised in the Proposed RMP/Final EIS to be the same as Alternative B. Therefore, there is no language remaining in the Proposed RMP/Final EIS that is able to be revised as suggested by commenter.
Soil Resources	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.2.2. Management actions – Fragile Soils (p.2-9): The Draft explains, “Fragile soil criteria are also slopes greater than or equal to 35 percent…” Allowing drilling on slopes of less than 35% is still likely to cause significant erosion. Therefore, we strongly recommend allowing exploration and production only in areas with 20% or less slope, as the proposed plan for the Roan Plateau requires (p.2-38 of the proposed RMP).	As noted in the Draft RMP/EIS, “fragile soil criteria areas are rated as highly or severely erodible by wind or water as described by the NRCS in the Area Soil Survey or as described by onsite inspection.” The end of the sentence includes an important fact that fragile soils may be identified based on the given criteria, “or as described by onsite inspection.” It is also important to note that areas with fragile soils are not the only areas that will receive management to reduce erosion. Alternative C in the Proposed RMP/Final EIS includes a management decision that “BLM would apply COAs and BMPs on a case-by-case basis at the activity level to protect soil resources.” While erosion could still occur, as described in chapter 4, these impacts would be minimized and mitigated.
Soil Resources	Vermillion Ranch Limited Partnership	Pg 3-16 3.1.3 The statement that prime and unique private lands are not affected by this decision is incorrect. All private land in the Little Snake Area is prime and unique because of the location and productivity as compared to BLM	BLM is unclear what decision is being addressed in the comment. The page reference is to chapter 3, which does not contain decisions or analysis, but background information on the existing condition of the resources and uses in the Little Snake Field Office. Additionally, the Draft RMP/EIS does not

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			state that unique and private lands are not affected, but that prime and unique farmlands, which are defined by regulation irrespective of ownership, are mainly located on private lands. BLM is using the results of the Moffat Soil Survey which did not identify any soils of unique or local importance within the RMPPA. This language has been clarified in the Proposed RMP/Final EIS.
Soil Resources	Vermillion Ranch Limited Partnership	3.1.3.1 Oppose biological crust statement, this statement is bias and unreflective of the conflicting science of biologic crust. Request removal or tell both sides.	The sentence in the Draft RMP/EIS is not a general conclusion to be associated with every soil type, but in specific reference to fragile soils. Due to the highly erosive nature of fragile soils, the presence of biological soil crusts help hold soil particles together and reduce wind and water erosion. Without such crusts, fragile soils would be more susceptible to erosion. Because the presence of biological soil crusts may reduce rangeland productivity doesn't negate the validity of the initial claim. Beyond this, the commenter has not identified or provided any scientific evidence to support their claim.
Special Status Species	Audubon Colorado	Of the alternatives proposed, only Alternative D offers the potential of an improved situation for wildlife and wildlife habitats. But it still lacks sufficient provisions to prevent GRSG (Greater sage-grouse) from declining in the region. The recommendations listed below are the minimum necessary in order to make Alternative D acceptable. Therefore BLM should adopt Alternative D with the following modifications: 1. Provide GRSG and other sensitive species with habitat areas that are off-limits to oil and gas drilling. Based on the information provided in the RMP/DEIS. This may be achievable by the following actions: -Close the Critical Sagebrush Habitat areas that contain known GRSG leks and nesting habitat, as shown on Map 2-4 of the RMP/DEIS, to all oil and gas drilling within their boundaries (i.e. no surface occupancy in these areas). Directional drilling from the edges of these Critical Areas can be used to develop the oil and gas resources found beneath them. These areas should also be closed to off-road vehicles and to the construction of roads for oil & gas development. -Designate the proposed Sage-Grouse Conservation Area as an Area of Critical Environmental Concern (ACEC).	Closing or applying no surface occupancy stipulations to the critical sagebrush habitat areas, which includes all areas within four miles of a sage-grouse lek site and the eight designated large patches of sagebrush habitat (Map 2-4 of the Draft RMP/EIS), was not considered a reasonable alternative because such restrictive stipulations on that large of an area would not meet BLM's multiple use mission, or the purpose and need of the EIS. In addition, it would provide minimal protection to sage-grouse because the vast majority of these areas already contain valid existing leases. In preparing the Proposed RMP/Final EIS, BLM has reviewed updated scientific literature and has coordinated extensively with greater sage-grouse experts to develop an approach to better protect sagebrush habitat. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based). This would maintain large blocks of high

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		-Close the Vermillion Basin and other proposed wilderness lands to oil and gas drilling and off-road vehicle activities. -Designate the 12 habitat areas that BLM has found eligible as ACECs and close them to oil and gas drilling and off-road vehicle activities.	priority sagebrush habitat and limit habitat fragmentation. Likewise, closing the areas from the Draft RMP/EIS Map 2-4 to off-road vehicles would be unnecessarily restrictive, as sage-grouse issues would be able to be addressed during travel management planning. In the Proposed RMP/Final EIS, there would be no high priority sagebrush habitat open to cross-country OHV use. OHV use in these areas would either be closed or restricted to existing routes (in the interim, designated routes when travel planning is completed within 5 years). As noted in the Draft RMP/EIS, Appendix G, the Sage-Grouse Conservation ACEC did not meet importance criteria, and was therefore not brought forward into one of the alternatives.
Special Status Species	Audubon Colorado	Of the alternatives proposed, only Alternative D offers the potential of an improved situation for wildlife and wildlife habitats. But it still lacks sufficient provisions to prevent GRSG from declining in the region. The recommendations listed below are the minimum necessary in order to make Alternative D acceptable. Therefore BLM should adopt Alternative D with the following modifications: 2. Outside of the above refuge areas, oil & gas development should only proceed if it complies with and implements the provisions of the conservation plans of the applicable GRSG working groups and if the following Mitigation Measures are incorporated into the pre-planning process for any new oil and gas development. These Mitigation Measures are contained in Audubon's (previously Audubon Wyoming's) Mitigation Measures document which has been provided to BLM in Wyoming and is appended as the remainder of this letter of comment.	Closing or applying no surface occupancy stipulations to the critical sagebrush habitat areas, which includes all areas within four miles of a sage-grouse lek site and the eight designated large patches of sagebrush habitat (Map 2-4 of the Draft RMP/EIS) was not considered a reasonable alternative because such restrictive stipulations on that large of an area would not meet BLM's multiple use mission, or the purpose and need of the EIS. In addition, it would provide minimal protection to sage-grouse because the vast majority of these areas already contain valid existing leases. In preparing the Proposed RMP/Final EIS, BLM has reviewed updated scientific literature and has coordinated extensively with greater sage-grouse experts to develop an approach to better protect sagebrush habitat. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based). This would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation.
Special Status	Audubon	Mineral Pre-planning Development Elements:	BLM performs site-specific oil and gas planning and NEPA when an Application for Permit to Drill (APD)

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Species	Colorado	Goal: Comprehensively describe past, present, and future developments and land uses including the potential locations and scale of oil and gas developments. Identify direct, indirect, and cumulative effects of development and land uses, concentrating on aspects that may impair the condition or function of the various ecological components for Greater Sage-grouse. Include management options that mitigate for any declines in sage-grouse populations resulting from impacts incurred through development (including all indirect and cumulative impacts). (Note: There may be many causative effects influencing populations declines, however mineral development has been proven to have negative impacts on grouse and therefore when a population is declining in relation to a developing mineral area is observed, mineral interests need to act on those declines (see threshold section below) until the measures taken reverse the declining trend). Finally, mitigation measures for those effects should be an adaptive management process and mitigation and reclamation procedures clearly defined.	is submitted by an operator. Operators can submit individual APDs to the BLM or many APDs together, which is often referred to as a Plan of Development (POD). BLM cannot prepare a landscape-scale field development planning document (often called a Geographic Area Plan [GAP]) without the detailed long-term plans operators include in a POD. Sometimes, in situations where the resource is well defined, operators can submit detailed plans. However, in exploratory areas such as the LSFO, it is more common for operators to submit individual APDs. BLM cannot force operators to submit a POD. If a POD is not received, BLM relies on a cumulative impacts analysis in individual environmental assessments to look at landscape-scale effects. The affected environment is adequately described in the Draft RMP/EIS and fulfills the intent of 40 CFR Sec. 1502.15, which states that, “The descriptions shall be no longer than is necessary to understand the effects of the alternatives.” More detailed descriptions of the affected environment may be developed for site specific projects. Landscape Health Assessments are “an assessment of the health of biological resources.” Land Health Standard requires that actions approved by BLM would allow special status species and their habitats to be maintained or enhanced by sustaining healthy native plant and animal communities. BLM is also required to ensure that all wildlife and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities. The results of Landscape Health Assessments within the RMPPA are provided in chapter 3 of the Draft RMP/EIS. Specific mitigation measures are determined on a project-by-project basis. It is not prudent to try and lay out all possible mitigation measures within this document since there are so many factors that would need to be considered, of which many are unknown until project-specific information is available. Consideration for offsite and onsite mitigation applies to any requests for exception, modification, or waiver for a surface disturbing or disruptive activity. In addition, there may be offsite mitigation requirements for activities that

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			may impact sensitive habitats, such as replacement of lost black-footed ferret habitat (onsite mitigation is also possible), big game winter range, and when existing oil and gas infrastructure exceeds the 5% disturbance threshold. Offsite mitigation entails protection of site in perpetuity.
Special Status Species	Audubon Colorado	General landscape planning principles and concepts: We recommend that a detailed conservation plan be done within and areas adjacent to mineral development as part of the pre-development process. The landscape analysis/planning should be done as part of cumulative analysis for the EIS/NEPA process. We recommend that planning, analysis, and mitigation of large, intense energy developments be done at a landscape scale appropriate to address the total local grouse population and geographic impacts to the region that are realized.	BLM performs site-specific oil and gas planning and NEPA when an Application for Permit to Drill (APD) is submitted by an operator. Operators can submit individual APDs to the BLM or many APDs together, which is often referred to as a Plan of Development (POD). BLM cannot prepare a landscape-scale field development planning document (often called a Geographic Area Plan [GAP]) without the detailed long-term plans operators include in a POD. Sometimes, in situations where the resource is well defined, operators can submit detailed plans, as is the case in Questar's Hiawatha Regional Energy Development Project. However, in exploratory areas such as the LSFO, it is more common for operators to submit individual APDs. BLM cannot force operators to submit a POD. However, in the voluntary sagebrush habitat protection approach in Alternative C, BLM does require a POD if the operator wants to realize the incentives offered by the BLM. If a POD is not received, BLM relies on a cumulative impacts analysis in individual environmental assessments to look at landscape-scale effects.
Special Status Species	Audubon Colorado	The following steps should be taken when initiating landscape pre-development conservation plan: a. Consult the appropriate state and federal wildlife agencies early in the planning process, during the pre-planning phase; b. Identify and delineate appropriate landscape planning units for sage-grouse and total locale of mineral development area; c. Inventory: Gather existing information or comprehensively inventory the biological and physical components of those units (including vegetation cover types, grouse seasonal habitats, current land uses, existing patterns of development, etc.). If adequate resource data are not available, include a means of collecting the information; Describe how those key physical and biological	The affected environment is adequately described in the Draft RMP/EIS and fulfills the intent of 40 CFR Sec. 1502.15, which states that, "The descriptions shall be no longer than is necessary to understand the effects of the alternatives." More detailed descriptions of the affected environment may be developed for site-specific projects. Landscape Health Assessments are "an assessment of the health of biological resources." Land Health Standard requires that actions approved by the BLM would allow special status species and their habitats to be maintained or enhanced by sustaining healthy native plant and animal communities. BLM is also required

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		components are functionally interconnected or interdependent, for example, the seasonal ranges and migration patterns of sage-grouse; d. Identify landscape goals and objectives based on the desired condition of grouse habitats; As necessary, design and conduct research to study and evaluate presently un-quantified effects, resource conditions, and key ecological processes; the study(s) should be designed as a research project(s) with the objective of quantifying if the development plan is working as desired; e. Formulate effective management and mitigation to avoid, minimize, rectify, or compensate adverse impacts – the overall objective is to maintain all grouse seasonal habitat components; f. Monitor: As reclamation and mitigation action is initiated, design a technically sound monitoring plan that will enable managers to refine their assessments of impacts, evaluate the effectiveness of mitigation, and detect unforeseen conditions; g. Adapt development protocol in a timely manner to counteract recognized deficiencies in the original development plan (i.e. adaptive management); h. To avoid or reduce unnecessary disturbances, wildlife conflicts, and habitat impacts, coordinate planning among companies operating in the same oil and gas field; clump leases at time of sale to facilitate this process; i. Include city planners, transportation department; police department; emergency responders etc. in pre-development process to address cumulative effects.	to ensure that all wildlife and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities. The results of Landscape Health Assessments within the RMPPA are provided in chapter 3 of the Draft RMP/EIS. In addition, BLM has consulted with the USFWS and prepared a Biological Assessment of the Proposed RMP for Threatened and Endangered species that occur in habitat within and adjacent to the planning area.
Special Status Species	Audubon Colorado	Specific Mitigation Measures within the Pre-Plan: Goal: Employ mitigation measures/methods that are effective and proven successful that will maintain local grouse populations in areas of development. a. Clearly define MITIGATION. Clear direction needs to be provided regarding defining mitigation; which would include studies demonstrating what “sagebrush improvement” techniques work and which should not be used (i.e. chaining/burning of decadent sage) so we do not end up destroying/eliminating the only grouse habitat remaining within and outside of the development areas. Habitat improvement projects should conclusively establish limiting seasonal habitat(s) (e.g., nesting habitat), establish the component of that habitat making it limiting (e.g., low grass cover), propose management options aimed at that component (e.g., what	Specific mitigation measures are determined on a project-by-project basis. It is not prudent to try and lay out all possible mitigation measures within this document since there are so many factors that would need to be considered, of which many are unknown until project specific information is available (i.e., location, duration, size of area impacted, sensitive species present, time of year, etc).

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		management practice enhances grass cover within sage-grouse nesting habitat) and make sure that management option has a high probability of success. Construct an adaptive monitoring plan that enables managers to refine their assessments of impacts of the project has on the habitat and grouse through the realized life of the project (e.g., if sagebrush is influenced by habitat treatment, post-treatment monitoring should occur until sagebrush densities are functionally equivalent to pre-treatment levels).	
Special Status Species	Audubon Colorado	Questions that should be raised before beginning an "improvement project". 1. Project Justification: Does the area need habitat improvement or is it functioning effectively without intervention? Does the proposed treatment target the habitat component limiting the sage-grouse population, and has the proposed treatment been successful in other similar habitat types? When a treatment is proposed, what information is used to justify the need for the treatment (i.e. is limiting habitat is inadequate)? 2. Method Justification: Where was that information collected? Was it collected in the same sort of vegetation and environment for which the treatment is proposed (i.e. will the proposed method ensure desired results)? 3. If thinking of “improving habitat” and removing “decadent sage”: What does “decadent” mean when applied to species of sagebrush in the area? 4. What evidence is there that sagebrush in general, or sagebrush in specific locations, is decadent? Is decadent sagebrush bad for grouse (no, if nesting or wintering is limiting grouse population)? 5. Are there specific and measurable goals for the treatment? What information (data) will be collected for judging the success or failure of the treatment? How, where, and how often will that information be collected? 6. Has thought been given to the possibility that treatment will hasten the spread of undesirable exotic plants? Will data be collected after the treatment that allows us to know whether exotic plants are invading or spreading? What if exotic plants do invade the treated area -- what steps can be taken to address the invasion? b. Goal: To conserve/protect all seasonal habitats needed by grouse such that the population of birds residing in the developing area is maintained or enhanced as reservoir populations to reestablish areas of the field where grouse populations are negatively impacted	BLM is required to ensure that all wildlife and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities by managing the land according to rangeland health standards, Colorado Standards, and other inventories. Assessments have been conducted or are in the process of being conducted using a protocol developed from BLM Handbook 4180. Decadent sagebrush is a monoculture of sagebrush, generally 80-100 years old. The decadent sagebrush habitat lacks forbs and other grasses which are important for both food for wildlife and sagebrush habitat diversity. While decadent sagebrush may provide cover, a healthy mosaic of habitat stages will provide cover and food for greater sage-grouse and other wildlife. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. The updated sections address many of the commenter’s issues.

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		or extirpated.	
Special Status Species	Audubon Colorado	One way to allay unavoidable wildlife impacts with intensive development such as with oil and gas or coal bed methane development is to protect and conserve in field and/or nearby habitat. If effective mitigation is to be included in project development areas, BLM must go further to ensure that such on or off site mitigation at least in part includes the acquisition or permanent protection of important habitat from future energy development.	Consideration for offsite and onsite mitigation applies to any requests for exception, modification, or waiver for a surface disturbing or disruptive activity. In addition, there may be offsite mitigation requirements for activities that may impact sensitive habitats, such as replacement of lost black-footed ferret habitat (onsite mitigation is also possible), big game winter range, and when existing oil and gas infrastructure exceeds the 5% disturbance threshold. Offsite mitigation entails protection of site in perpetuity.
Special Status Species	Audubon Colorado	Steps: 1.Through the landscape planning process, ensure that the set aside will result in a viable, maintainable population through perpetuity, including not only seasonal habitats but migration or genetic dispersal corridors so a viable genetic population is maintained (e.g., a migratory population does so between winter to summer habitat; and both seasons are needed to keep individuals alive). Set asides should be thought of as a series of protected areas interconnected by dispersal corridors at least 1.6 km (1 mile) wide; these protected areas and corridors should contain no anthropogenic sources of disturbance (e.g., roads, power lines, buildings), and should be protected in such a state (Braun 2006). The COMBINATION of these areas and corridors represents the refuge meant to keep a viable population of sage-grouse within a developed area; 2.Propose critical sage-grouse areas for “no lease” before the “auction phase” of the BLM leasing procedure; 3.Make sure planning areas/landscape plans include not only set aside areas, but areas to be developed (i.e., the landscape plan needs to be completely inclusive in terms of spatial orientation of developed and non-developed areas, and the corridors to connect these).	BLM has established BMPs for habitat reclamation associated with surface disturbing activities. Many BMPs related to greater sage-grouse conservation are listed on page 2-25 of the Draft RMP/EIS. BLM has been a leader in greater sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, the BLM developed the National Sage-Grouse Habitat Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive performance, habitat capability, and conservation

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			threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources.
Special Status Species	Audubon Colorado	Pre-planning Reclamation and Threshold Mitigation Measures: Goal: To effectively reclaim developed areas to previous existing habitat components for grouse as well as have population and habitat "trigger points" when development should be halted to ensure grouse populations persist in the developing area. a. Define RECLAMATION: Define reclamation requirements that include an inventory before development has begun to know what we must reclaim back to (i.e. species diversity, abundance, cover and density). Clear reclamation techniques that have been proven to be effective should be employed, with set dates for compliance and mandated actions if not met. Monitoring and treatment of reclaimed areas should continue until the pre-determined percentage by pre-development inventory of plant cover, composition, and diversity standards have been met; b. Development in gas fields should not be permitted until development in previously disturbed areas has been fully reclaimed and ongoing disturbances in those areas minimized; c. Establish effective, interim reclamation on all surface disturbances associated with ancillary facilities including equipment staging areas. Interim reclamation should be achieved using a variety of native grasses and forbs; d. Increase reclamation bond on well pad sites from 1954 standards of $24,000 to fair current market price of to assure mineral interests will not abandon reclamation process after development is completed; e. Define species and habitat THRESHOLDS declines in a population should be 10% or less of the estimated population over 3	BLM has established BMPs for habitat reclamation associated with surface disturbing activities. Many BMPs related to great sage-grouse conservation are listed on page 2-25 of the Draft RMP/EIS. BLM has been a leader in greater sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, the BLM developed the National Sage-Grouse Habitat Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive

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		years (Connelly et al. 2000)) that if reached would trigger immediate reduction in development levels and/or pace. A comprehensive and ongoing monitoring program must also be required to support an adaptive management approach when threshold issues arise. NOTE: There may be many causative effects influencing populations declines, however mineral development has been proven to have negative impacts on grouse and therefore when a population is declining in relation to a developing mineral area is observed, development needs to be reduced or halted until measures are taken to reverse this trend.	performance, habitat capability, and conservation threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources. Regarding an adaptive management approach, a discussion of how BLM would work with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan, has been added to the Proposed RMP/Final EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures Goal: To minimize impacts to grouse populations and habitats within development fields. a. All existing and new compressor stations should add noise abatement devices (mufflers) not exceed 10 dBA to reduce audible noise within 5.5 km of active leks.	Research articles or available science has been considered by BLM; however, recommendations, assertions, and opinion made in the literature are by no means required to be incorporated verbatim into management actions. BLM is required, and has a responsibility, and a legislated mandate, to evaluate and consider available research within the scope of its multiple use mandate and formulate management actions, mitigation measures, BMPs, and eventual decisions that are supported by law, regulation, policy, as well as available science. As an example, the management actions and mitigation measures in the Proposed RMP for management of greater sage-grouse and sagebrush dominated habitats conform to the recommendations made in the BLM National Sage-grouse Strategy.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: b. All surface activity should be prohibited within 5 km during the drilling phase of development (increasing it from the current .25-mile buffer stipulation) and minimize surface occupancy to 1 well per	See General Comment Response #31

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		section within 3 km of an active grouse lek (Holloran and Anderson 2004, 2005);	
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: d. Roads should not be placed within 5.5 km (3.3 miles) of active leks. If roads are present, they should be seasonally closed during the sage-grouse breeding season from 1 March to 20 June (Braun 2006);	See General Comment Response #31
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: e. Require transportation plans in each resource area, both permanent and seasonal road/trail closures should be considered to reduce disturbance to sage-grouse during breeding activities and winter (Braun 2006). Secondary roads within 5 km of active leks should be closed during the 1 March-20 June period as well as during winter - i.e. December-February (Braun 2006);	See General Comment Response #31
Special Status Species	Audubon Colorado	Surface Activity Pre-Plan Mitigation Measures: f. All secondary roads and trails within critical sage-grouse habitat should be reviewed and considered for permanent closure and re-vegetation (Braun 2006);	See General Comment Response #31
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: g. Avoid placement of well pads, roads and other well field facilities within identified winter concentration areas. Avoid human and equipment activity within winter concentration areas from 15 November through 14 March (USDI/BLM 2004c);	BLM has established a number of BMPs to reduce/minimize disturbance of activities on greater sage-grouse that apply to both breeding and winter seasons. Some of these BMPs encourage operators to reduce the long-term footprint of facilities to the smallest practical space, minimize pad size and other facilities, and use remote telemetry to monitor wells to reduce daily visits to wells, to name a few. Under Alternative C (Proposed RMP), crucial winter habitat is closed from December 16 to March 15, which is in line with Braun 2006 that describes the winter period as early to mid-December to early to mid-March. In addition, BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: h. Confine development to concentrated development areas, cluster drill pads, roads and facilities. New drilling, pad construction, and road building should be explicitly limited to the industry-identified “concentrated development area” along the crest of the Pinedale Anticline for the life of the field (i.e. no outside drilling until this area	Footprint reduction technologies can be applied on a site specific basis to reduce, prevent, or avoid adverse environmental impacts. These technologies do not apply to all situations. They need to be adapted to meet the site-specific requirements of a particular project as well as the local environment

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		has been fully exploited for its gas and fully reclaimed);	and are incorporated into site-specific project proposals and supported by site-specific environmental analysis.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures i. Salvage topsoil from all road construction and re-apply during interim and final reclamation;	BLM has developed and encourages the use of BMPs to reduce/minimize the disturbance/impacts of activities on the resources. In certain circumstances operators or lessees would be required to accept and implement established BMPs (i.e., to obtain exceptions from certain land use restrictions). There are established surface reclamation performance standards that lessees are required to use to reclaim all disturbed areas. Reclamation practices that must be applied or accomplished are re-grading to the approximate original contour; effectively controlling noxious weeds; separating, storing, and protecting topsoil for redistribution during final abandonment; seeding; and controlling erosion. (Information contained in Appendix O) In addition, projects that remove topsoil in areas of suitable habitat for listed and candidate plants should set aside and replace the topsoil when ground work is completed to preserve the seed bank and associated mycorrhizal species (Appendix J). BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: j. Centralize and combine pipeline systems and other facilities and infrastructure to minimize disturbance during development and production	BLM has developed and encourages the use of BMPs to reduce/minimize the disturbance/impacts of activities on the resources. In certain circumstances operators or lessees would be required to accept and implement established BMPs (i.e., to obtain exceptions from certain land use restrictions). There are established surface reclamation performance standards that lessees are required to use to reclaim all disturbed areas. Reclamation practices that must be applied or accomplished are re-grading to the approximate original contour; effectively controlling noxious weeds; separating, storing, and protecting topsoil for redistribution during final abandonment; seeding; and controlling erosion. (Information contained in Appendix O) In addition, projects that remove topsoil in areas of suitable habitat for listed

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			and candidate plants should set aside and replace the topsoil when ground work is completed to preserve the seed bank and associated mycorrhizal species (Appendix J). BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Measures: k. All employees should receive environmental awareness training during orientation. BLM should fund development of an environmental awareness video for use by all companies. The video should provide information about native wildlife, sensitivity to various kinds of impacts, effects and consequences of poaching, information about wildlife laws, licensing and residency requirements, and outdoor recreation opportunities;	The requirement for and content of an environmental education program is currently within BLM's authority; a land use plan decision is not needed authorize environmental education activities. Based on direction in BLM's planning handbook (BLM-H-1601-1) the commenter's suggestion is better considered during the implementation phase of land use planning and management. As such, it is out of scope for analysis in this EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: l. Employees should be instructed to avoid walking away from vehicles or facilities into view of wildlife, especially during winter months and breeding (courtship, nesting) seasons;	See General Comment Response #41
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: m. Employees should not be allowed to carry firearms while on the job or riding in company vehicles.	Control of firearms, whether potentially carried by federal employees or public land users, including employees of companies with permits or leases on public lands, is not an RMP-level decision. It is, therefore, out of scope for analysis in this EIS.
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: n. Best available control technology (BACT) should be applied to all gas-well operations. Stringent dust-control measures should be pursued, along with industrial processes that reduce emissions of hazardous pollutants.	See General Comment Response #41
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures: o. No development should take place in aquifer recharge zones, on grades exceeding 25 percent, within 500 feet of riparian areas, or when soil is saturated;	See General Comment Response #41
Special Status Species	Audubon Colorado	Surface activity Pre-plan Mitigation Measures r. Remote monitoring: Install remote monitoring instrumentation to reduce or eliminate travel by persons and vehicles for the purpose of manually inspecting and reading instruments.	See General Comment Response #41
Special Status	Colorado	Additional Greater Sage-Grouse research from Wyoming has	BLM has updated the management for greater sage-

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Species	Department of Natural Resources	resulted in the need for the DOW to revise its recommendations consistent with the concept of adaptive management set forth in the original recommendations. The DOW is currently collecting northwestern Colorado specific Greater Sage-Grouse data at several study sites. Until that research is complete, it is imperative that we use the best available science to develop our management recommendations. These modified recommendations will also effectively protect the vast array of sagebrush obligate species in the Little Snake Resource Area.	grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Appendix O, Surface Reclamation Performance Standard, has been revised to further protect sagebrush and other important habitat.
Special Status Species	Colorado Department of Natural Resources	The potential listing of Greater Sage-Grouse poses not only a threat to gas development but would greatly expand restrictions on grazing, recreation and other legitimate land uses on federal lands within the Little Snake Resource Area. The modified approach attached to this letter is our best chance at avoiding a future listing of the Greater Sage-Grouse. The proposal will provide a responsible management approach designed to maintain a viable Greater Sage-Grouse population while still allowing for reasonable access to the gas resource in the Planning Area.	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Appendix O, Surface Reclamation Performance Standard, has been revised to further protect sagebrush and other important habitat.
Special Status Species	Colorado Department of Natural Resources	While the Department has made specific comments about Greater Sage-Grouse, we also request that the final Little Snake RMP continue to include strong statements regarding the importance of effective adaptive management and provides for effective mechanisms to ensure that it is implemented successfully. As we have seen with Greater Sage-Grouse, the need to be able to adapt to a rapidly developing, research based foundation of data is critical to protecting wildlife. Because the Little Snake RMP area includes Greater Sage-Grouse, White-tailed Prairie Dogs and the potential for future release of Black-Footed Ferrets (as well as other game and non-game species of great importance to Northwest Colorado), it is critical we incorporate the developing body of knowledge into the management of the area as the information becomes available.	BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large

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			blocks of undisturbed habitat. Appendix O, Surface Reclamation Performance Standard, has been revised to further protect sagebrush and other important habitat.
Special Status Species	Colorado Division of Wildlife	Since CDOW completed its work on the initial draft of the sagebrush habitat functionality proposal, sage grouse research has been conducted which casts doubt on the assumptions under which the original 5% surface disturbance/160 acre surface spacing proposal was created. Indeed, more information about the impacts of oil and gas development on sage grouse has been reported since spring, 2006 than was known before. Matt Holloran's work in Wyoming (Holloran 2005) was just beginning to become widely available in the spring of 2006. Holloran found that greater sage-grouse lek attendance declined as oil and gas activity developed with eventual abandonment of leks occurring with time and higher density of gas development. Additionally, he documented that significant additional mortality of adults occurred at higher surface densities. Holloran also suggests that existing greater sage-grouse habitat protection stipulations applied by BLM in Wyoming are inadequate to protect sage grouse at large scales and high levels of development.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain, and restore sage-grouse populations and their habitats.
Special Status Species	Colorado Division of Wildlife	Dave Naugle's initial work on effects of oil and gas (coal-bed methane) development on greater sage-grouse in the Powder River Basin was released in June, 2006 and presented locally in October, 2006. His findings are currently undergoing peer review and are expected to be published in a peer reviewed journal soon. His work (Naugle et al. 2006a) supports many of the findings in Holloran (2005) and further fleshes out the surface density at which substantial impacts on greater sage-grouse occur. He reports that impacts on lek attendance began to occur at surface spacings at or above 1 well pad per 640 acres and those impacts became significant between 1 well pad per 320 acres and 1 well pad per 160 acres. Unfortunately, this new research directly challenges the assumptions that the original sagebrush habitat functionality proposal was based upon in the draft LSFO plan.	BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain, and restore sage-grouse populations and their habitats. BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat.
Special Status Species	Colorado Division of Wildlife	Naugle et al. (2006b) also found that presence of development affected use of winter ranges by greater sage-grouse. It is becoming widely suggested that surface spacings at or below 1 well pad per 80 acres eventually eliminates greater sage-grouse from these habitats. Naugle et al. (2006a) also report that current BLM stipulations are inadequate to protect greater sage-grouse in the Powder River Basin where wells are spaced at relatively close densities. He has proposed that the only way to protect greater	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Appendix O, Surface Reclamation Performance Standard, has been revised to protect sagebrush and

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		sage-grouse at a landscape scale in the face of significant oil and gas development is to develop and maintain large scale sage grouse refuge areas deferred from oil and gas development to retain the grouse's core use areas within critical occupied habitat. Dave Naugle is currently employed as a science advisor by BLM in Washington, D.C. for the 2006-2007 academic year.	other important habitat.
Special Status Species	Colorado Division of Wildlife	Partially in response to Naugle's findings, CDOW Director Bruce McCloskey and BLM Director Kathleen Clarke began discussions in the fall of 2006 on methods to maintain wildlife habitat in oil and gas development areas. These discussions resulted in a CDOW proposal presented to the Colorado State BLM office in the winter of 2006-2007. This proposal describes a process used to develop greater sage-grouse core areas and a refuge concept for maintaining sage grouse populations during oil and gas development (CDOW 2006). A copy of the proposal is attached to these comments (Attachment A) for reference. A map of the greater sage-grouse lek size and density information used in development of the core areas is included in these comments (Figure 1). The refined core areas are presented in Figure 2 along with the existing sagebrush protection patches discussed in the draft RMP. The proposal addresses greater sage-grouse populations statewide and mule deer in the Piceance Basin. The portions of the document relevant to the Little Snake RMP are located in the greater sage-grouse section in the first 6 pages of the document.	The sagebrush core areas (Map A from the CDOW document) cover 866,000 acres, 501,000 acres over federal minerals. Excluding this much land from mineral development would not meet the purpose and need statement in the Proposed RMP/Final RMP or the multiple use mandate of BLM. BLM has increased several sage-grouse stipulations in the Proposed RMP/Final EIS and crafted creative mitigation approaches to maintain functionality of sage-grouse habitat. Large-scale closures to leasing are contrary to BLM policy and do not represent a reasonable alternative. The voluntary and mandatory sagebrush protection approaches in Alternative C (Proposed RMP), developed in cooperation with CDOW, require operators to submit a POD which illustrates a strategy to preserve large blocks of unfragmented sagebrush habitats. The refuge concept is an important goal BLM and cooperating agencies are advancing through the sagebrush protection strategies.
Special Status Species	Colorado Division of Wildlife	The Wilderness Society's Center for Landscape Analysis in Seattle, WA has also done extensive GIS analysis of the existing sagebrush habitat functionality proposal (Thomson and Hartley 2006). Their analysis provides compelling visual and factual information that the level of development the sagebrush habitat functionality proposal and BLM's RFD projections in the RMP would permit in the LSFO will likely have significant negative impacts on wildlife species including big game and greater sage-grouse. If predictions about the scale or pace of development in the RFD are underestimates, these impacts could be substantially intensified and accelerated.	The Wilderness Society's GIS analysis only considered one of the two criteria required under the sagebrush protection approach: the 5% surface disturbance limitation. It did not consider the other criterion of requiring a POD which illustrates a strategy for limiting habitat fragmentation and creating sagebrush refuges. BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species and other wildlife. Objectives that have been established for achieving this goal include

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			maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. In addition, before any surface disturbance activity, surveys would be conducted of potential habitat for Colorado BLM Sensitive Species, including greater sage-grouse. Should any such species be found, all disruptive activities would be halted until species-specific protective measures were developed and implemented.
Special Status Species	Colorado Division of Wildlife	Much of the acreage within the LSFO has been leased for oil and gas. Some of the leases are small (30 acres or less) and some are larger leases of 1 or 2 sections. Further confounding the leasing situation is the number of different mineral lessees. The sagebrush habitat functionality proposal would be best implemented on large lease blocks.	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. BLM agrees that the sagebrush protection approach is best implemented in large project areas. Oil and gas operators are allowed the flexibility to design project areas that may include more than just small leases. Oil and gas operators have a strong incentive to make project areas as large as possible, because more acres would be available for them to develop without exceeding the disturbance caps.
Special Status Species	Colorado Division of Wildlife	The sum of the new information presented above leads CDOW to question the assumptions originally used in development of the sagebrush habitat functionality proposal in the draft RMP and suggests that wildlife habitat, particularly for greater sage-grouse may be unacceptably harmed by application of the sagebrush habitat functionality proposal as it is currently written across the range of greater sage-grouse in the LSFO. Evidence from Wyoming and Montana that suggests greater sage-grouse may be extirpated from areas if large refuge areas are not set aside devoid of oil and gas development.	The sagebrush core areas (Map A from the CDOW document) cover 866,000 acres, 501,000 acres over federal minerals. Excluding this much land from mineral development would not meet the purpose and need statement in the Proposed RMP/Final EIS or the multiple use mandate of the BLM. BLM has increased several sage-grouse stipulations in the Proposed RMP and crafted creative mitigation approaches to maintain functionality of sage-grouse habitat. Large-scale closures to leasing are contrary to BLM policy and do not represent a reasonable alternative. The voluntary and mandatory sagebrush

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			protection approaches in Alternative C (Proposed RMP), developed in cooperation with CDOW, require operators to submit a POD which illustrates a strategy to preserve large blocks of unfragmented sagebrush habitats. The refuge concept is an important goal BLM and cooperating agencies are advancing though the sagebrush protection strategies.
Special Status Species	Colorado Division of Wildlife	In lieu of widespread application of a refuge/phased development approach like that described in Attachment A (CDOW 2006), CDOW recommends the following changes to the existing sagebrush habitat functionality proposal to reduce risk of significant losses of habitat suitability in the most important areas for the species and increase the likelihood that sage grouse populations can be maintained in the LSFO. It is important to note that this approach is untested and conveys significant risk to sage grouse and other wildlife should it fail. Rigorous application of the adaptive management principals described in the RMP will be necessary for the sagebrush habitat functionality proposal to operate well.	BLM has been a leader in greater sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, the BLM developed the National Sage-Grouse Habitat Conservation Strategy. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive performance, habitat capability, and conservation threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources. In addition, BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.

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Special Status Species	Colorado Division of Wildlife	Within the administrative boundary of the LSFO, we evaluated habitats and placed them within high, medium and low priority categories. In the lowest priority category, we placed the parts of the landscape that are least important to wildlife, the medium category includes the areas wildlife are highly dependent upon, and the high category includes those areas that are critical to wildlife due to high range fidelity or areas that are irreplaceable. It is important to note that these importance categories are relative. Nearly all portions of the LSFO are highly valuable to wildlife, but some habitat types and locations are clearly more valuable than others. The lowest priority habitats in the LSFO consist of overall big game winter range and summer range. The medium priority habitats consist of big game winter concentration areas, severe winter range, migration corridors, sage-grouse winter range, sage-grouse breeding habitat, areas within the 4-mile radius of leks located outside of the sage-grouse core areas, and ephemeral streams. The highest priority habitats consist of sage-grouse core areas, which include 4-mile lek radii around the largest leks, onions of sage grouse winter range, and portions of big game winter range.	BLM has revised chapter 2 and the sagebrush habitat map to identify high and medium priority habitats based on coordination between CDOW and BLM wildlife biologists.
Special Status Species	Colorado Division of Wildlife	Expand the sagebrush protection patches (shown in Map 2-4 in the LSFO draft EIS) in the sagebrush habitat functionality proposal with CDOW's newly developed sage grouse core areas (CROW 2006), which are shown in Figure 2. CDOW and BLM biologists developed the current sagebrush protection patches through geospatial delineation of important habitats on federal surface and mineral estates. The CDOW core areas were developed based on areas where sage grouse are greatest in number and density and where critical habitats are present. CDOW, through a more rigorous mathematical and GIS modeling process, determined that loss of these cores would diminish the number of grouse to potentially irretrievable levels. Even though the processes used to develop these areas differ, the original sagebrush protection patches are highly coincident with, though smaller than, the core areas delineated by CDOW. The core areas provide a more complete picture, however, of the most important areas for greater sage-grouse on all ownerships within the LSFO and are both large enough and contain a high enough percentage of greater sage-grouse to ensure effective conservation of the species.	BLM has revised chapter 2 and the sagebrush habitat map to identify high and medium priority habitats based on coordination between CDOW and BLM wildlife biologists.
Special Status Species	Colorado Division of Wildlife	Within the sage grouse core areas (similar in location to the sagebrush protection patches in the draft but larger and not clipped to federal ownership), limit surface disturbance to 1% to increase the likelihood that greater sage-grouse and big game within these	BLM has updated Alternative C in chapter 2 for sagebrush management and has incorporated differential levels of disturbance to these habitats. BLM's concern is that a voluntary 1% limit of surface

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		highest priority sagebrush habitats can be sustained. All other timing waivers, plan of development requirements, etc. would follow the sagebrush habitat functionality proposal in the draft as modified herein. This recommendation is intended to provide an additional level of security to greater sage-grouse and big game wildlife in these habitats, given the uncertainty surrounding oil and gas impacts on wildlife, while still allowing development of existing leases within these core sage grouse habitats. Additionally, applying differential levels of surface disturbance to sagebrush habitats in the LSFO provides a de facto active adaptive management experiment to fully evaluate the effects of varying surface disturbance and surface spacing levels on wildlife.	disturbance would eliminate the incentive for oil and gas operators to enter into the approach, as keeping the disturbance below 1% in a lease or project area would be difficult. Instead of a voluntary disturbance limitation, the updated sagebrush protection approach would require that disturbance remains below 1% for new leases in core areas.
Special Status Species	Colorado Division of Wildlife	Clarify that the sagebrush habitat functionality proposal only applies to larger leased acreages or lease holders or aggregations of leases (i.e. leaseholders could add together a number of smaller leases). A minimum viable acreage to which the sagebrush habitat functionality proposal would apply should be at least 320 acres or greater in areas within 4-miles of sage grouse leks and 640 acres or greater in sage grouse core areas. CDOW is concerned by the large number of very small existing oil and gas leases issued in the LSFO, especially in mixed ownership areas in central and eastern Moffat County and western Routt County. Many of these leases are less than 160 acres in size with a large number at 40 acres or less. Five percent surface disturbance applied on a per lease basis to small, closely spaced leases could result in significant amounts and concentration of surface disturbance well beyond that envisioned in the sagebrush habitat functionality proposal. The sagebrush habitat functionality proposal was developed around a conceptual average surface spacing of one well pad per 160 acres and has its greatest application on large lease blocks. The sagebrush habitat functionality proposal would provide no protection on smaller leases, where this conceptual surface spacing exceeds the size of the lease. A minimum size of 320 acres would be the minimum lease size that would allow application of the principals in the sagebrush habitat functionality proposal to limit habitat fragmentation in areas allowing 5% surface disturbance. A minimum size of 640 acres would be required to see the benefits of the more restrictive recommendation in sage grouse core areas.	Lease sizes for these areas would be determined on a case-by-case basis. However, based on the sagebrush management language that was revised in the Proposed RMP/Final EIS the BLM has the ability to reject small project areas, as well as PODs that don't "facilitate larger sage-grouse sanctuaries and better create habitat protection on a landscape scale." Requiring a minimum lease size of 320 acres within 4 miles of a lek, or 640 acres for sage-grouse core areas, is not necessary, as leases of such size would be extremely difficult to implement given a 1% and 5% ceiling on surface disturbance. The concepts behind the 1% and 5 % disturbance ceilings provide incentives for larger leases. Development of 1% or 5% of a 40 acre lease would be 0.4 and 2 acres, respectively. Because it is assumed that development of oil and gas facilities would disturb an assumed average of 8 acres for each facility, it would be impossible for such small leases to develop while complying with the disturbance limitations. This would require leaseholders to expand their "project area" to be able to develop any facilities while still complying with the surface disturbance ceilings. These are considerations that future lease-buyers would need to consider when identifying the preferred size of a lease. Finally, BLM has the ability to deny and/or approve the project area to which the 1% and 5% disturbance thresholds would apply, ensuring that the goals to sustain the integrity of the sagebrush biome would be able to be met.

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Special Status Species	Colorado Division of Wildlife	New oil and gas leases issued in areas operating under the modified sagebrush habitat functionality proposal (both areas within 4-miles of sage grouse leks and areas within sage grouse cores) should be as large as possible. As explained above, minimum sizes for new leases within 4-miles of sage grouse leks should be expanded to 320 acres. Leases within sage grouse core areas should be no smaller than 640 acres. Larger lease blocks, up to BLM's legal maximum, would provide even more flexibility in creatively minimizing habitat fragmentation. CDOW encourages LSFO to maximize the lease block sizes in future leasing decisions and consider federal unit formation to control the extent to which sagebrush is fragmented and to retain sage grouse core areas and critical sage grouse habitats within 4 miles of sage grouse leks.	Lease sizes for these areas would be determined on a case-by-case basis. However, based on the sagebrush management language that was revised in the Proposed RMP/Final EIS BLM has the ability to reject small project areas, as well as PODs that don't "facilitate larger sage-grouse sanctuaries and better create habitat protection on a landscape scale." Requiring a minimum lease size of 320 acres within 4 miles of a lek, or 640 acres for sage-grouse core areas, is not necessary, as leases of such size would be extremely difficult to implement given a 1% and 5% ceiling on surface disturbance. The concepts behind the 1% and 5 % disturbance ceilings provide incentives for larger leases. As noted above, BLM has the ability to deny and/or approve the project area to which the 1% and 5% disturbance thresholds would apply, ensuring that the goals to sustain the integrity of the sagebrush biome would be able to be met.
Special Status Species	Colorado Division of Wildlife	The sagebrush habitat functionality proposal should encourage voluntary unitization or lease concentration and the use of single operators to facilitate surface management. Voluntary agreements to maximize the size of management areas to which the sagebrush habitat functionality proposal will be applied will increase management flexibility and provide additional opportunities to minimize habitat fragmentation.	The concepts identified by the commenter are built into BLM's revised sagebrush management approach in the Proposed RMP/Final EIS Alternative C in chapter 2. The revised approach manages oil and gas development to protect sagebrush functionality and to encourage larger project areas, allowing for development disturbance to be placed in a manner to better protect unfragmented habitat.
Special Status Species	Colorado Division of Wildlife	Plans of development under the sagebrush habitat functionality proposal (pp 2-18 to 2-19) should be expanded to include reclamation plans, weed management, and monitoring plans. These specific components should be required parts of any plan of development accepted by BLM for participation under the sagebrush habitat functionality proposal. The type and manner of reclamation (what and how) and monitoring (what, how often, and by whom) will be critical components of assessing rolling reclamation success and tracking surface disturbance to ensure compliance with the letter and spirit of the sagebrush habitat functionality proposal.	Appendix O in the Proposed RMP/Final EIS, which has been revised, contains these elements.
Special Status Species	Colorado Division of Wildlife	Plans of development under the sagebrush habitat functionality proposal should be expanded to include additional on and off-site compensatory mitigation opportunities. Compensatory mitigation may become necessary to sustain greater sage-grouse and big game populations during oil and gas development. Compensatory	Chapter 2 of the Draft RMP/EIS already addresses using in-kind offsite or compensatory mitigation to recuperate disturbed areas in sagebrush habitat. Further use of compensatory mitigation will be guided by BLM's policy for offsite mitigation, as

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		mitigation commitments should be provided for in plans of development submitted under the sagebrush habitat functionality proposal.	presented in Instruction Memorandum 2008-204. All forms of mitigation will be considered in plans of development.
Special Status Species	Colorado Division of Wildlife	Oil and gas and other federal minerals under greater sage-grouse core areas should not be leased or re-leased. While establishment of large greater sage-grouse refuges which allow long-term deferral of mineral development appears unlikely at present, this may ultimately prove to be the only effective means of conserving greater sage-grouse populations in areas of extensive oil and gas development. The LSFO should preserve the limited options it currently has for establishment of future refuges by retaining unleased minerals within greater sage-grouse core areas and by avoiding the re-leasing of minerals in those areas until the alternative sagebrush habitat functionality proposal can be fully evaluated. Failure to do so now increases the risk of future ESA listing of greater sage-grouse if the sagebrush habitat functionality proposal proves inadequate to conserve the species within the LSFO.	The sagebrush core areas (Map A from the CDOW document) cover 866,000 acres, 501,000 acres over federal minerals. Excluding this much land from mineral development would not meet the purpose and need statement in the Proposed RMP/Final EIS or the multiple use mandate of the BLM. BLM has increased several sage-grouse stipulations in the Proposed RMP and crafted creative mitigation approaches to maintain functionality of sage-grouse habitat. Large-scale closures to leasing are contrary to BLM policy and do not represent a reasonable alternative.
Special Status Species	Colorado Division of Wildlife	Greater sage-grouse habitat protections outside the sagebrush fragmentation process: The greater sage-grouse NSO around leks should be expanded from .25 miles (C Alternative) to 0.6 miles (D Alternative). Research in Wyoming and Montana (Holloran 2005, Naugle et al. 2006a) indicates that current BLM stipulations to protect greater sage-grouse, including .25 mile radius lek buffers, are not protecting leks as expected in areas of significant energy development. The Colorado Greater Sage-Grouse Conservation Plan (CDOW 2007a) recommends that land management adopt a .6 mile radius buffer around greater sage-grouse leks throughout Colorado. This radius is based on an analysis of the radius around leks within which male sage grouse can be found during the breeding season. This plan was released to agencies in draft form in March, 2007 with public draft release expected in June, 2007. It will be finalized in the fall of 2007.	Alternative C in chapter 2 for sagebrush functionality has been revised to include the 0.6 mile NSO around leks.
Special Status Species	Colorado Division of Wildlife	Greater sage grouse are especially problematic for several reasons. It appears that during the development phase at least, even low levels of energy extraction (> I well pad per 600 acres) exclude grouse from preferred habitats and increase mortality rates. Research in Montana and Wyoming has indicated lease stipulations designed to protect sage grouse, namely timing restrictions on drilling and 0.25 mile no surface occupancy restrictions have not prevented grouse declines in natural gas and coal-bed methane fields. Given the scope and intensity of oil and gas development in	BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving

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		the West, listing of Greater sage-grouse under the ESA is likely in the near future if some plan for maintaining them is not developed and funded. Although deer, elk and pronghorn appear to be somewhat more resilient, the value of these resources in the northwest part of the state is irreplaceable and must be protected.	this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. Alternative C in chapter 2 for sagebrush functionality has been revised to include the 0.6 mile NSO around leks.
Special Status Species	Colorado Division of Wildlife	Greater sage-grouse occur in several populations across northwestern Colorado. The largest and most widespread populations are in Moffat County, which is comprised of several population segments (zones), North Park (Jackson County), and Middle Park (Grand and Summit counties). Other populations occur in Northern Eagle/Southern Routt counties, Meeker/White River (Rio Blanco County), and Parachute/Piceance/Roan (Rio Blanco and Garfield counties); these populations are smaller and more fragmented. Sage-grouse are highly dependent upon sagebrush and are closely tied to traditional lek sites, where breeding activity takes place. Most (80%) nesting and early brood-rearing also takes place within about a 4-mile radius of leks. Available evidence indicates that sage-grouse are highly sensitive to even low-intensity disturbance associated with energy development, particularly on leks/breeding areas but also on winter range. In order to identify core refuge areas for sage grouse the DOW GIS group mapped intersections of three GIS layers: 4-mile buffers around active leks, 5-year average numbers (density) of males on leks, and sage brush patch sizes. This identified areas most critical to sage grouse and presumably other sagebrush obligates. Identified intersection areas were converted to core refuge areas by eliminating small isolated areas of birds/habitat, and prioritizing areas identified as winter habitat. These areas were consolidated to the area required to protect via a 4-mile buffer 80% if the nesting habitat used by no less than 50-60% of each population or population segment. In some cases this analysis identified core areas which protected substantially higher percentages of sage grouse which affords flexibility in future development planning efforts.	See General Comment Response #31

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		The results of this sage grouse core refuge analysis are depicted graphically in Figure 1 and numerically in Tables 1 and 2. Summed across all 7 counties in NW Colorado, 10% of the acreage was incorporated in core refuge areas which protected 74% of the sage grouse (Table 1). This ranged from a low of no refuge areas in Eagle, Garfield, Rio Blanco and Summit Counties to a high of 28% of Moffat County. The proportion of each sage grouse population protected by core areas is depicted in Table 2, and varied from none in Parachute/Piceance/Roan to 88% of the NW Colorado population. These core refuge areas would be off-limits to any energy development or production activity until development in non-core areas was completed and successfully rehabilitated. To aid in Industry understanding the implications of these core refuge areas we have provided an analysis of how much of these refuge areas fall in identified high, medium and low oil and gas potential areas.	
Special Status Species	Colorado Division of Wildlife	Non-core areas occupied by sage-grouse in each population or population segment (Moffat County) would be developed subject to rigorous BMPs which would include some combination of the following: 1) A staged and clustered approach to development, in which no more than 20% of the population outside core areas is impacted by development at any one time. This presumably means 30-40% of areas outside the core could be developed at any one time, but drilling and habitat restoration must be completed before moving to the next block. 2) Timing restrictions on disruptive surface activities are put in place during the spring lekking period. 3) Stipulations on placement of drill pads and roads relative to leks and other critical habitats. 4) Well-pad density is minimized. 5) Human presence is minimized using available technology. 6) Native vegetation is restored in disturbed areas. 7) Adjacent and/or off-site habitat enhancement and/or protection	See General Comment Response #41
Special Status Species	Colorado Division of Wildlife	Following development and restoration of areas peripheral to the core "refuge", energy development may occur in the core areas, subject to the above BMPs and assuming populations have maintained during the development and production/restoration phases. Some thought could be given to completely relaxing stipulations in the peripheral area being developed at any one time, under the idea that 80% of the birds are not impacted and it may be	See General Comment Response #31

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		best to get energy extraction activities in and out as quickly as possible. In exchange, and under either scenario, industry would be expected to contribute substantial resources to mitigate the impact on and off-site during development and production phases.	
Special Status Species	Colorado Division of Wildlife	In the Piceance/Roan/Parachute population (PPR), which is small and isolated, any level of energy industry activity is likely to have major detrimental impacts on grouse persistence. Our ability to impose conditions to protect grouse is nominal because virtually all energy leases have been let. The BLM has imposed stipulations on these leases to protect grouse. We are not advocating a refuge concept here, rather a longer term strategy may be appropriate here. Industry would undertake long-term habitat improvement/restoration efforts (such as pinyon juniper removal) for local grouse populations, so that more and better sage grouse habitat exists after the period of highest development and disturbance associated with energy industry activities is completed. Emphasis for sage grouse in these areas will be on completing development activities near these populations as quickly as possible, to set the stage for population restoration efforts. In addition to funding these habitat improvement/restoration efforts, Industry would provide funding to stabilize and protect sage grouse populations off site.	The Piceance/Roan/Parachute population is not within the Little Snake Field Office planning boundaries, and therefore decisions for this population are not within the scope of this NEPA project.
Special Status Species	Colorado Natural Heritage Program	Our primary concern is lack of adequate protection for the globally rare Gibben's beardtongue (Penstemon gibbensii). This plant species is known from only seven locations in the world, and is considered critically imperiled in all three states where it occurs (Colorado, Utah, and Wyoming). Though this plant occurs in three states, the total area of occupied habitat is very small. Many areas of seemingly ideal habitat have been searched with negative results, confirming the extreme rarity of this plant. In Colorado, Gibben's beardtongue occurs in only two locations, both on BLM lands in the LSFO (one location straddles the boundary between BLM and the Browns Park National Wildlife Refuge). As one of the few landowners with occurrences of this plant, the BLM LSFO has a significant share of the responsibility for future viability of this species. CNHP has identified two Potential Conservation Areas (Spitzie Draw and Sterling Place) that delineate the primary area that needs to be managed to conserve this species. These areas have extremely high biodiversity significance, and meet the relevance and importance criteria for ACEC designation. Based on the extreme rarity of this species, the few opportunities available to conserve it, and the importance of BLM management decisions to its	BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that in the future would avoid having to list these species as threatened or endangered; maintain, restore, or enhance the habitat of special status species; maintain or restore the populations of special status species to the extent possible; and prioritize inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. In addition, before any surface disturbance activity, surveys would be conducted of

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		continued existence, CNHP feels that ACEC designation of these areas, coupled with a specific management plan for Gibben's beardtongue, is warranted. There are four other rare plant species that have a significant portion of their known occurrences in Colorado on BLM lands in the LSFO - narrowleaf evening primrose (Oenothera acutissima), Duchesne milkvetch (Astragalus duchesnensis), single-stem wild buckwheat (Eriogonum acaule), and Caespitose cat's eye (Cryptantha caespitosa). Of these, only the Caespitose cat's eye occurs within the one ACEC that is proposed (Irish Canyon). Proposed Wilderness Study Areas only include one historic occurrence of the narrowleaf evening primrose. Of these four species, the highest priority is the narrowleaf evening primrose. This species is considered imperiled across its range (Colorado and Utah). There are 14 known occurrences in Colorado, 11 of which are on BLM lands within the LSFO. Only two Colorado occurrences have good quality ranks - one of these occurs entirely BLM lands in the LSFO. CNHP believes that this area would meet the relevance and importance criteria for ACEC designation. Little is known about the Colorado occurrences of the milkvetch, the buckwheat, and the cat's eye. Additional research on these rare plants is needed. As currently written, the proposed Special Status Species Conservation Measures and Recommendations apply only to plants with federal legal status under the Endangered Species Act. Though these plants are all BLM Sensitive Species, they do not have ESA status, and thus the conservation measures and recommendations would apparently not apply to them. Expanding these measures and recommendations to apply to BLM Sensitive Species would provide some conservation benefit to these species.	potential habitat for Colorado BLM Sensitive Species, including Gibben's beardtongue. Should any such species be found, all disruptive activities would be halted until species-specific protective measures were developed and implemented. BLM would also survey for rare plant communities, and if any such communities were found, all disruptive activities would be delayed until specific protective measures were developed and implemented, if appropriate. In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in at least one of the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G (Areas of Critical Environmental Concern Evaluation). The Draft RMP/EIS, chapter 2 (page 2-23) contains management for special status plant species that would protect them from all permitted surface disturbing activities. As such, ACEC designation would not provide any additional protection, and is therefore not needed to protect and prevent irreparable damage to the relevant and important values.
Special Status Species	Colorado Wildlife Federation	In our scoping comments submitted on January 31, 2005, we emphasized that to avoid undue impact, the following lands should be withdrawn permanently from oil and gas development or protected with stipulations prohibiting any adverse impacts to surface resources: Areas of critical environmental concern (ACECs): Lands within 3 miles of sage grouse leks; Lands within 1 mile of Columbian sharp-tailed grouse leks; Lands within 500 feet of surface water and riparian areas; Lands within 1 mile of active raptor nests; Black-footed ferret colonies	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and modified surface reclamation performance standards in the Proposed RMP/Final EIS. In accordance with BLM Manual 1613-1.12, BLM identified special management for potential ACECs and existing ACECs in an array of management alternatives presented in chapter 2. Management considered in Alternative C was designed to protect endangered species, sensitive plants, remnant plant communities, sensitive habitat, scenic quality, and natural processes or systems or other important and

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		The draft RMP and preferred alternative fall short of prescribing action needed to prevent unnecessary or undue degradation of the lands upon which these crucial resources are dependent. The language in Alternative C implies that all current ACECs may not be maintained. This flexibility is of great concern, in part, because the term “sensitive resource” was not defined. Alternative C also does not provide adequate protection to ensure the sustainability of greater sage grouse, a species which is sliding toward a precarious situation. We do not believe that the 0.25 radius buffer around a lek is close to sufficient during the strutting period.	relevant values identified for each area. Additionally, existing special management area designation provides full protection of values, thus eliminating the need for special management attention afforded by an ACEC designation. The management action proposed in the alternatives will offer management flexibility to ensure resource values are protected while allowing acceptable levels of resource use that includes mineral entry, livestock grazing, OHV use, and oil and gas development.
Special Status Species	Colorado Wildlife Federation	The 0.6 buffer in Alternative D for surface disturbance should be the minimum if there are topographical features between the disturbance and the lek. If the area is flat, a necessary distance is 1 mile and any human activity within that area should be precluded. We do support closing nesting habitat to surface disturbance from March 1 to June 30, and crucial winter habitat from December 16 to March 15. We are pleased that there will be no exceptions. It should be stated that the Colorado Division of Wildlife will approve designation of these areas. In addition, BLM should ensure that there will be no net loss of these habitat types and specific restoration and enhancement measures will be undertaken in all habitat occupied by these birds in the last 30 years (to the extent data are available). As to raptors, Alternative D, at a minimum, must be implemented. We support the proposed 1 mile buffer around nesting and fledgling habitat to avoid abandonment (which should apply to human activity on the ground (not only truck traffic). These birds are very sensitive to human disturbance and will abandon nesting platforms if humans are frequently present within a 0.25 mile. We also support the 0.5 mile-buffer for osprey to avoid abandonment of nests. As to the black-footed ferret, we support the language in Alternative D if it is approved as adequate by the U.S. Fish and Wildlife Service. This is the most endangered mammal in the nation and much federal funding has been directed to recovery planning and implementation steps. It probably is inadequate to limit OHVs to only 0.25 mile of the release sites for 3 to 4 months during the release period. The no surface occupancy restrictions should apply to the entire prairie dog colony with a reasonable year-long buffer if black-footed ferrets are present in the colony.	BLM has reviewed the best available scientific research pertaining to energy development and its impact to wildlife. The restrictions found in the Proposed RMP (Alternative C) reflect this scientific review. BLM is unaware of any scientific studies showing that the provisions for black footed ferret under Alternative C are inadequate to protect black-footed ferrets. The protections afforded to black-footed ferrets under Alternative C have been consulted upon with the USFWS and approved by the Service. Site-specific travel management concerns, including proximity of roads to release sites, can be addressed during comprehensive travel management planning.
Special Status Species	Environmental Protection Agency (EPA), Region 8	EPA encourages BLM to continue to coordinate with the US Fish and Wildlife Service (FWS) and the Colorado Division of Wildlife, to assess whether the proposed plan will provide an effective means of improving the condition of the sage grouse and its habitat, to identify	Mitigative measures in Alternative C (Proposed RMP) have been developed in consultation with USFWS and the CDOW, using the best available science. CDOW and USFWS are cooperating

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		the best available science, to develop effective adaptive management strategies and a reclamation standard that is more appropriate for sage grouse, and to provide adequate information on these issues in the EIS.	agencies for the RMP revision and helped develop the sagebrush habitat protection approach outlined in Section 2.5.5.2 of the Draft RMP/EIS. If it is determined in the future that these measures are ineffective BLM would amend the RMP to incorporate new information and revise the mitigative measures at that time. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 based on CDOW and USFWS recommendations and revised surface reclamation performance standards of the Proposed RMP/Final EIS.
Special Status Species	Environmental Protection Agency (EPA), Region 8	The DEIS articulates a goal of improving the condition of special status species. It is not clear from the DEIS whether the Plan will, in fact, improve the condition of the sage grouse. The adaptive management strategy does not explain how the strategy would work to make adjustments if impacts to sage grouse are found. It is not clear how the appendices to the DEIS on adaptive management measures (Appendices A and M) would apply in the context of the Plan outlined above. The adaptive management plan appears to be missing a commitment to funding a monitoring plan, a protocol for the monitoring plan, and clarity on what would be done if the monitoring triggers indicators showing a decline in sage grouse populations.	Management of sagebrush habitat in the Proposed RMP/Final EIS chapter 2, Alternative C has been revised, as have surface reclamation performance standards in Appendix O. The Proposed RMP/Final EIS chapter 4 has been updated to reflect the updated impacts from the sagebrush management changes. Additionally, a section was added to Alternative C (Proposed RMP) stating that BLM would work with CDOW and other agencies to achieve the sage-grouse targets contained in the Northwest Colorado Greater Sage-Grouse Conservation Plan. Funding cannot be committed through an RMP. Appendix M describes the adaptive management framework BLM would employ when implementing the Proposed RMP. It was not intended to contain resource-specific targets, trigger points, or dictate specific management actions when change is triggered. Describing these specific adaptive management components in a land use plan would defeat the purpose of adaptive management. If new scientific information indicated that outcomes, targets, or triggers should be adapted, this would not be possible without a land use plan amendment. Appendix M states that an Assessment Guidance Document would be developed that contains system-level desired outcomes, indicators, trigger points, and monitoring protocols. Appendix M does explain the process that BLM would employ when making system-level or project-level adjustment if adaptive

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			management is triggered for sage-grouse or other resources (See “Step 4: Making System-Level Changes” on page M-6 and “Step D: Make Project-Level Changes” on page M-9).
Special Status Species	Environmental Protection Agency (EPA), Region 8	Recognizing that the science continues to emerge on this issue, EPA recommends further analysis of potential impacts to sage grouse.	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Impacts to greater sage-grouse have been specifically identified in chapter 4 of the Proposed RMP/Final EIS, incorporating recent sage-grouse studies and more clearly identifying impacts to the species across the alternatives.
Special Status Species	Environmental Protection Agency (EPA), Region 8	The proposed Plan should reference and address wildlife studies conducted in the Pinedale Anticline areas. These studies found that male counts on sage-grouse leks that were heavily impacted by gas wells declined 51% from one year prior to well development in 1999 through 2004 (Holleran, 2005), Further results of the long-term study on effects of wellfield development to greater sage-grouse lek attendance indicate that the .25 mile buffer surrounding leks, within which surface disturbance would be avoided, is insufficient to maintain function of lek habitats due to wellfield activities and associated noise (Holleran, 2005 and Ecosystem Research Group, 2006).	BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. Site specific studies from throughout the west were taken into consideration while developing management prescriptions for the sage-grouse. BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information.
Special Status Species	Environmental Protection Agency (EPA), Region 8	It is not clear what the impacts will be to the sage-grouse if some lessees opt not follow the plan and are not restricted to 5% disturbance areas but have seasonal time constraints in which they can operate, and some lessees opt for the plan, in which case they can drill year round. It is unclear how these two options work together and what the impacts would be on the sage grouse.	Chapter 4 of the Proposed RMP/Final EIS has been revised to include these impacts. It should be noted that the 1 and 5% stipulations would be required for all new leases. Therefore, there is no option for new lessees to opt out. A valid existing lease conveys certain rights of development to the leaseholder. A stipulation cannot be added to an existing lease after the lease is issued. It is unknown how many existing lease holders would opt into the voluntary agreement, so BLM cannot accurately quantify impacts of this approach. Impacts from existing leases, and the lack of new management, were addressed in the Proposed RMP/Final EIS.
Special Status Species	Environmental Protection	EPA recommends that after consultation with the FWS and the Colorado 'Division of Wildlife, the BLM may need to describe the	Mitigative measures in Alternative C (Proposed RMP) have been developed in consultation with

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	Agency (EPA), Region 8	projected cumulative impacts to the sage grouse from the proposed development and other reasonably foreseeable projects in surrounding areas as part of its cumulative impact analysis on wildlife. The cumulative impact analysis should provide more information on the current status of the sage grouse, a special status species for BLM, at present, and projected impacts to the sage grouse. Recent scientific data for the area should be cited and considered.	USFWS and the CDOW, using the best available science. The Cumulative Impacts section of the Proposed RMP/Final EIS has been revised to specifically address cumulative impacts to sage-grouse. However, chapter 4 is not the location to identify information on the current status of the sage-grouse. Chapter 4 is supposed to identify impacts from the various alternatives. Chapter 3 of the Draft RMP/EIS presents information on the political and ecological status of the sage-grouse, including the results of scientific monitoring.
Special Status Species	Form Letter #8	BLM must not lease or allow development within critical habitat for endangered species.	As noted in the Draft RMP/EIS (page 3-56), critical habitat has been designated for two species (Colorado pikeminnow and razorback sucker) that coincides with BLM land managed as part of the LSFO RMPPA. Critical habitat for these species, as well as for the humpback chub and the bonytail chub, are protected by the establishment of NSO stipulations for all their "critical or occupied habitat" (page 2-59 of the Draft RMP/EIS). Additionally, there is another no surface occupancy stipulation for up to 0.25 miles from perennial water sources, depending on type and use of the water source, soil type, and slope steepness. These prescriptions, combined with site-specific considerations before any implementation actions are approved that may affect these species' habitat, will provide protection to the critical habitat.
Special Status Species	Grouse Inc.	The Draft EIS inadequately presents what is known about greater sage-grouse in the area covered by the RMP as substantial information is available. The number of active sage-grouse leks may be under represented, but few data are presented on brood and winter use areas. The most important periods for sage-grouse are winter, nesting, and brood rearing. Wintering habitats in the Little Snake Resource Area are limited in severe winters and highly fragmented. Nesting areas are highly degraded by livestock grazing and habitat fragmentation. Optimal brood rearing areas are extremely limited but clustered. These areas are highly overgrazed by livestock.	The Draft EIS acknowledges the limited habitats for sage-grouse in severe winters, as well as the fragmented state of these habitats. Additionally, critical sage-grouse lek sites are accurately represented in Map 2-4, properly identifying sagebrush habitat and buffer areas around lek sites, in addition to their proximity to roads and human population centers. BLM has established BMPs for habitat reclamation associated with surface disturbing activities. Many BMPs related to greater sage-grouse conservation are listed on page 2-25 of the Draft RMP/EIS. In preparing the Proposed RMP/Final EIS, BLM has reviewed updated scientific literature and has coordinated extensively with

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			greater sage-grouse experts to develop an approach to better protect sagebrush habitat. The sagebrush management actions contained in the Proposed RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based). This would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation. BLM has been a leader in greater sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, BLM developed the National Sage-Grouse Habitat Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive performance, habitat capability, and conservation threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at

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			different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources.
Special Status Species	Grouse Inc.	The best science available is not used as the BLM continues to use a 0.25-mile buffer for No Surface Occupancy (NSO) for areas around active sage-grouse leks. The DEIS indicates that most, if not all, sage-grouse use areas are acceptable for leasing for energy development.	See General Comment Response #31
Special Status Species	Grouse Inc.	Management of sagebrush habitats to benefit sage-grouse is not considered.	BLM has revised management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS and has revised the surface reclamation performance standards. Alternative C considers the management of sagebrush to maintain or increase large, unfragmented areas of habitat for sage-grouse and other wildlife species, while allowing for other uses.
Special Status Species	Grouse Inc.	There is no mention of what will be done in the section on Monitoring (Table F-1) if sage-grouse populations decline.	Appendix F only addresses the type of monitoring activities, not the exact response to the various potential results obtained from those monitoring activities. Any potential actions taken in response to monitoring results will depend on site-specific conditions that may have led to such results. Language has been added to chapter 2 of the Proposed RMP/Final EIS, in Alternative C (Proposed RMP), that identifies a time-frame within which actions (to be determined after an evaluation of site-specific conditions, as noted above) would be taken to reverse declining sage-grouse trends.
Special Status Species	Grouse Inc.	Mitigation of obvious impacts caused by present treatments of areas used by sage-grouse and for those additional areas to be impacted is not considered.	BLM has revised the surface reclamation performance standards and has added additional management, including mitigation, for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development

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			with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E. In addition, Appendix M – The Adaptive Management Process for Implementation of Alternatives B, C, and D indicates from past experience that some actions that could potentially be reversible while other actions may not be reversible or would be difficult to reverse. If the action adversely impacts wildlife habitat BLM would learn from the experience and would not authorize another project in a similar circumstance.
Special Status Species	Grouse Inc.	The BLM combines Alternatives A, B, and D into their preferred Alternative (# C) and fails to give adequate consideration to Alternative D (protection of resources).	See General Comment Response #31
Special Status Species	Grouse Inc.	Consideration of increasing the number of Areas of Critical Environmental Concern (ACEC) is rejected while ACECs to benefit sage-grouse are desperately needed from Blue Mountain and Cold Springs Mountain on the west to West Gibraltar on the east and Axial Basin on the south. Further, most of the areas used by sage-grouse in severe winters should be included in ACECs.	In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G (Areas of Critical Environmental Concern Evaluation). Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives.

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Special Status Species	Grouse Inc.	Coal bed methane production is mentioned (Appendix C) but without any discussion of the apparent relationship with West Nile virus and its' negative affects on Greater sage-grouse.	West Nile Virus was identified as a possible contributor to greater sage-grouse mortality in several studies. The potential for this impact is addressed in chapter 4 or the Proposed RMP Final EIS. Management for the reduction of mosquito breeding sources will be addressed during site-specific planning.
Special Status Species	Grouse Inc.	The literature cited in the DEIS on sage-grouse is not adequate nor current as Braun et al. (2002) is not cited on the impacts of oil and gas activities on sage-grouse, Rowland (2004) is not cited on effects of habitat management practices, Schroeder et al. (2004) is not cited on overall distribution of sage-grouse and sagebrush habitats, and the multiple peer-reviewed publications of M. J. Holloran outside of his Dissertation (2005) are not cited. The Connelly et al. (2004) report poorly represents the actual status of sage-grouse in Moffat County as the available data were not used leading to information in the DEIS that is untrue and not supported by the available data.	The Proposed RMP/Final EIS has been revised to include more recent publications on sage grouse, their habitat, and impacts from various land uses.
Special Status Species	Grouse Inc.	Overall, the DEIS fails to take a "hard look" at all of the direct, indirect, and cumulative environmental consequences of the development that will result from the preferred Alternative. The DEIS does not meet the conditions of professional integrity concerning sage-grouse issues as required by the National Environmental Policy Act.	The Proposed RMP/Final EIS meets the conditions of NEPA for a land use planning document. The level of detail for a BLM Resource Management Plan is meant to be a broad view. Direct, indirect, and cumulative environmental consequences of the development that will result from the Proposed RMP/Final EIS are considered in the document. A more detailed "hard look" will be taken as site-specific planning is underway.
Special Status Species	Grouse Inc.	Energy production on public lands is not recent (Braun et al. 2002), and there has been exploration and development of typical sources such as coal, oil, and gas dating to the 1880's. While past interest has seemed to be cyclic, depending upon demand, the recent interest in gas, and especially development of gas from coal bed methane and "tight sands" gas deposits, seems to be almost unprecedented. Many areas proposed for gas production in the western United States, including the Little Snake Resource Area, have been among the most productive for sagebrush-dependent wildlife, especially sage-grouse. Thus, increased development of energy resources in sagebrush steppe habitats has the potential to negatively affect sage-grouse.	Chapter 4 of the Proposed RMP/Final EIS contains the impact analysis of the four alternatives. The special status species section of chapter 4 discusses the impacts of oil and gas development could have between the four alternatives which are described in chapter 2. Chapter 2 has been revised to include further protection to sage-grouse. Below is a summary of the management actions from chapter 2 that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development

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			with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E. BLM considered all alternatives in the planning process, and has expanded Alternative C to include greater protections to sagebrush habitat.
Special Status Species	Grouse Inc.	The Little Snake Resource Area includes portions of Moffat, Rio Blanco, and Routt counties in northwest Colorado in an area known to be productive for wildlife and especially sage-grouse (Rogers 1964). Colorado in general, has highly fragmented and discontinuous sagebrush habitats (Braun 1995). Further fragmentation of the Little Snake Resource Area from energy development and degradation of habitats upon which this population depends will negatively impact the largest expanse of sage-grouse habitat in Colorado. This has already happened in most other states with disastrous results, including most areas in Colorado.	BLM has updated the management for sagebrush in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Conservation measures used by BLM are designed to provide the continued viability of the species and habitat, while meeting wildlife population objectives.
Special Status Species	Grouse Inc.	1. Winter—General maps showing the location of sage-grouse winter use areas in the DEIS for the Little Snake Resource Area are inadequate. Focus should immediately be placed on locating and mapping sage-grouse winter-use areas throughout the RMP area. This should have the highest priority, as over winter survival is critical to population maintenance. Without over winter survival, all other needs of sage-grouse become extraneous. Detailed maps should be prepared for both “average” or “normal” winters and severe winters which happen every 7-10 years. Once these areas are located and mapped; they should be described using standard measures for live sagebrush canopy cover, height, etc. following the approach of Connelly et al. (2000). Once identified, these areas must receive special attention (for example, designation as “Areas of	The maps provided are adequate for a landscape level planning document. Winter habitat has been given protection in regards to new oil and gas leases, as detailed in chapter 2 of the Proposed RMP Final EIS. Evaluation of ACEC Relevance and Importance Criteria states that the proposed action meets one of the two criteria for consideration of increasing the number of ACECs (relevance, due to the sensitive plant species), but not the other (importance) because the area is not unique when compared to other areas containing the species. Sagebrush is of significant importance in the planning area and is treated as such in the Proposed RMP Final EIS.

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		Critical Environmental Concern") to reduce or prevent disturbance during winter, wild fire, and management activities that make them less useful to sage-grouse. Special attention should be given to any disturbance that reduces amount of live sagebrush, leaf surface, canopy cover, and height.	
Special Status Species	Grouse Inc.	2. Leks--The available data on leks in the Little Snake Resource Area (not precisely identified in the DEIS) are quite robust but it is likely that not all active lek sites have been located and the status (active, inactive [< 2 years, > 2years]) of many sites mapped is poorly known. Further, there are gaps (some leks have not been counted every year) in the count data, and the number of counts/lek in a given year obviously varies. The available long-term trend in numbers of cocks is down as Braun (1998) documented (page 142) a 82% decrease in males counted, a 57% decrease in number of active leks, and a 58% decrease in number of males per active lek counted during the interval from 1978-80 through 1996-98 for lower Moffat County. These data markedly differ from those presented in Connelly et al. (2004) and in the DEIS (pages 3-60 to 3-62, Figs. 3.2 and 3.3). Connelly et al. (2004) admitted their data for Moffat County were incomplete and subject to error.	BLM has accounted for lek sites in the Little Snake Resource Area. Connelly et al (2004) stated that a span of approximately 10 years within the timeframe of 1965 to 2003 where sage-grouse were not accounted for properly (in Moffat County), preventing the usage of that data in the report; however, the text seemed to suggest that recent years of the census were more accurate in their counts.
Special Status Species	Grouse Inc.	Unpublished data available from the Colorado Division of Wildlife indicate some recovery in numbers of active leks and males counted through 2006. However, these numbers may be influenced by better access, and more emphasis on counts with more people counting after 1999. Since active sage-grouse leks are relatively easy to locate during late March and April, standard surveys of all areas within the Little Snake Resource Area should be conducted in April 2007 and continuing at 3-year intervals. All known lek sites should be checked for activity in spring 2007. Those classified as active should be counted (number of cocks) 3-4 times each spring at 7-10 day intervals starting in late March- early April, depending upon weather conditions, and continuing into early May every year. Those classified as inactive should be checked in late April/early May every 2-3 years to ascertain any change in status. UTM (or GIS) coordinates for all lek sites should be taken and plotted on base maps.	BLM cooperates with DOW during each breeding season to conduct lek counts on all known lek sites regardless of activity status. As part of this cooperative effort, BLM utilizes the protocol developed by DOW for conducting lek counts. In addition to cooperative lek count efforts, BLM biologists actively search for previously unknown lek sites on BLM managed lands during each breeding season. In addition, BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Grouse Inc.	3. Nesting—Adequate data on areas used for sage-grouse nesting in the Little Snake Resource Area does exist (but is not presented in the DEIS) in specific areas (Cold Spring Mountain [Dunn 1984], and southwest of Craig [Hausleitner 2003]). Because sage-grouse have been shown to nest at a variety of distances from active leks and use a variety of micro sites for nest placement, it is difficult to identify	As part of the management of greater sage-grouse, surveys will be conducted by BLM, as well as CDOW, in accordance with the Northwest Colorado Greater Sage-Grouse Conservation Plan and the Colorado Greater Sage-Grouse Conservation Plan. In addition, BLM has revised the surface reclamation

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		all nesting areas. Thus, the Connelly et al. (2000) Guidelines should be followed to offer some protection to habitats useful for nesting at distances up to 3 miles from active leks. Since most actual nesting occurs within this distance (Braun et al. 1977) (with some nests at much greater distances, Hausleitner 2003), it is most reasonable to depict nesting habitat as all sagebrush areas with > 10% live canopy cover of sagebrush (primarily A. tridentata vaseyana, A. t. wyomingensis, A. tripartita, A. nova, and A. cana depending upon location) and a healthy understory of native grasses and forbs. Since active lek sites can be located, identifying concentric areas within a 4-mile radius (Hausleitner 2003) around each lek site that will include most nesting sites is presently the only reasonable method to map potential nesting areas.	performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Grouse Inc.	4. Brood-rearing--Broods, upon hatching, use areas close to the locations of successful nests and progressively move towards moist areas upon desiccation of vegetation in the uplands. Review of the available data (in the DEIS) suggests only general knowledge exists of where broods have been observed. This may be true for areas outside of Blue Mountain, Cold Springs Mountain, Fortification Creek, and southwest of Craig (CDOW Federal Aid Reports for 1974-1999, Dunn 1984, Hausleitner 2003). Brood data appear to not have been mapped in relation to known sources of water (at ground level) or at riparian sites along streams, springs, etc. This should be done so that additional management consideration can be given to these areas. Management that should be in place includes movement of livestock to avoid degradation of plant communities in moist sites and riparian areas, and fencing to allow livestock access to water only in sites where erosion and plant community degradation would not be expected or could be controlled. Early brood survival is believed to be a problem throughout Colorado (C. E. Braun, unpublished CDOW harvest reports, 1974-1999). Early brood survival is most affected by insect and succulent forb availability within secure (good hiding cover provided by grasses and forbs) habitats (Connelly et al. 2000). Late brood rearing habitat is primarily in close proximity (< 1 mile) of sites with moisture and succulent forbs adjacent to escape cover provided by live sagebrush (Connelly et al. 2000).	BLM Colorado has developed livestock grazing guidelines (Appendix A) in concert with the Resource Advisory Councils. The guidelines are the management tools, methods, strategies, and techniques (e.g., BMPs) designed to maintain or achieve healthy public lands. Standard #4 states “Special status, threatened and endangered species (federal and State), and other plants and animals officially designated by the Bureau of Land Management (BLM) and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.” Therefore, the management of livestock and health of sage-grouse habitat is considered and established. A number of actions can be taken at the activity level to address possible impacts to sage-grouse broods from livestock grazing management.
Special Status Species	Grouse Inc.	The long-term data presently available conclusively demonstrate the health of the sage-grouse population and trends in quality of the available habitats in the little Snake Resource Area have markedly declined over at least the last 45 years. The overall trend in number of sage-grouse counted in spring is down since 1978-80, although	Connelly et al. (2004) and other sources are represented in the Draft RMP/EIS as well as the range-wide change in population index for the sage-grouse from 1965 to 2003. BLM has considered these data in analysis.

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		count effort has increased as has access to potential areas with sage-grouse. The DEIS should have presented data on trends in numbers of active sage-grouse leks, counts of males on leks, and production data such as chicks per hen which would have allowed a thorough analysis for each of the identified zones (Table 3-16). These data are available for the Little Snake Resource Area (CDOW files). In the absence of presentation of these data, an adequate analysis of the direct and cumulative impacts of the four proposed alternatives is not possible.	
Special Status Species	Grouse Inc.	In addition to the already substantial coal, oil, and gas development impacts, there are the additive effects of livestock grazing, power line and road placement, ranch building placement, and management treatments of sagebrush steppe areas to improve forage for livestock. All of these factors (and many more) have cumulative effects on ecosystem health and trends in numbers of all animals that are dependent upon the sagebrush steppe. Teasing apart the specific impacts is not possible without detailed analysis of existing data followed by replicated studies. What is clear is that continuing practices presently in place or those proposed on public lands administered by the BLM will not improve conditions for or knowledge about local populations of sage-grouse. They will only lead to continued decline in health of the sagebrush habitat and in the distribution (the area of useful habitat is decreasing) and abundance of sage-grouse.	In response to comments received regarding cumulative impacts and direct impacts in the Draft RMP/EIS, BLM has considered impacts to the sage-grouse and has presented recent data in the Proposed RMP/Final EIS to include analysis areas and additional supportive documentation of potential impacts.
Special Status Species	Grouse Inc.	Long-term monitoring efforts (20-30 years at the minimum) and research studies to tease apart the specific impacts of energy development and other multiple use activities, especially livestock grazing, are critically needed in the Little Snake Resource Area. These efforts should focus on public lands (and include immediately adjacent private and State lands) and be funded by Federal land management agencies, the oil and gas industry, and the livestock industry. Monitoring is briefly mentioned (Appendix F, Table F-1) but no mention is made of what procedures will be followed if sage-grouse populations continue to decline.	Appendix F does not identify every monitoring activity that will take place during implementation of the RMP, nor does it provide details for how monitoring activities will occur. The identification of specific monitoring methodology and data storage strategies are not RMP-level decisions as identified in BLM's planning handbook (BLM-H-1601-1), but are implementation-level decisions. Therefore, specific monitoring strategies, methodologies, or collection/maintenance issues will be addressed subsequent to finalization of this RMP. BLM will continue to work with CDOW and other stakeholders to monitor the health of sage-grouse populations and habitats.
Special Status Species	Grouse Inc.	The cumulative effects of all human-induced practices in the sagebrush steppe on sage-grouse population health as measured by numbers of active leks, trends in numbers of males counted, and	The information for sage-grouse, including population trends, trends for males per lek, and information of sage-grouse habitat and population trends within the RMPPA is presented in chapter 3 of

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		chicks per hen need to be fully evaluated and studied.	the Draft RMP/EIS. Where available, this information has been updated in the Proposed RMP/Final EIS. Additional information may be monitored during the implementation of the RMP.
Special Status Species	Grouse Inc.	Scientific study has not identified a minimum viable population size or specific habitat size requirement for any population of sage-grouse. Further, habitat quality varies greatly depending upon soil factors, aspect, elevation, moisture, temperatures, management prescriptions, past and present uses, etc. Thus, there is no one definition or description of habitat quality that fits all situations as it is known that some sage-grouse populations persist in extremely degraded and marginal appearing habitats. It is also hypothesized that such populations are at great risk of extirpation as populations in similar habitat conditions have completely disappeared. Therefore, because of the difficulties in determining minimum viable population size and defining key habitat parameters for sage-grouse, it is imperative that a conservative approach is taken towards management of activities that could compromise sage-grouse habitat and fragment local populations. A reasonable conservative approach would be to adopt the Connelly et al. (2000) Guidelines in terms of distances around active leks for no surface occupancy, residual cover to encourage nest success, etc.	See General Comment Response #31
Special Status Species	Grouse Inc.	Management studies should be immediately implemented that focus on possible predation impacts as affected by fragmentation and livestock grazing impacts. It is clear the BLM has routinely permitted and encouraged practices favorable to important predators of sage-grouse including but not limited to fences, power lines, construction of roads for oil and gas development, and other habitat fragmenting practices. Sage-grouse did not evolve with these practices.	BLM is currently implementing BMPs identified in both the 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan, and the 2007 Colorado Greater Sage-Grouse Conservation Plan. Both of these references have been considered and are currently cited in the Proposed RMP/Final EIS for management practices and past studies.
Special Status Species	Grouse Inc.	Review of existing documents for the Little Snake Resource Area indicates the BLM has consistently ignored sage-grouse needs and the scientific literature upon which developed guidelines (Braun et al. 1977, Connelly et al. 2000) to maintain sage-grouse populations are based.	Both of these references have been considered and are currently cited in the Proposed RMP/Final EIS for management practices and past studies.
Special Status Species	Grouse Inc.	Most seriously, the BLM has chosen a 0.25-mile distance from active leks for avoidance of or restrictions on development even though the scientific literature (Holloran 2005) indicates there should be no manipulation of sagebrush habitats within 3 miles of active leks (Connelly et al. 2000). The 0.25-mile restriction seems to have been created to justify existing practices and is not based on any reputable science. The BLM's own analysis (see Pinedale Anticline	BLM has been a leader in greater sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, BLM developed the National Sage-Grouse Habitat

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		Project Draft EIS 1999: 5-34 as an example) (also Holloran 2005) reports that, “of leks with at least one well within a 0.25-mile radius, four times as many are inactive than active” and that “more than three times as many leks with at least one oil or gas well within a 0.50-mile radius are inactive”. Oil and gas well site development as well as development of roads, power lines, etc. all cause manipulation of habitat and reduction in area useable to sage-grouse. Further, BLM documents (for example, Atlantic Rim Coalbed Methane Projects, Cow Creek Pod and most other DEIS documents in Wyoming, Montana, and Colorado) indicate, “exceptions [for any restrictions] may be granted if the activity will occur in unsuitable [nesting = breeding] habitat”. This type of language continues to be used in the DEIS for the Little Snake Resource Area without any scientific explanation of why habitats may be “unsuitable” (for sage-grouse). Appendix E of the DEIS, ‘Procedures and Criteria for Granting Exceptions, Modifications or Waiver’, is incomplete and completely ignores greater sage-grouse needs. It fails to meet any reasonable standard for content or scientific merit.	Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive performance, habitat capability, and conservation threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources. In addition, BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Grouse Inc.	As part of its mitigation guidelines and standard practices for surface disturbing activities, BLM has generally imposed restrictions on activity within 2-3 miles of leks before the 9:00 AM and after 5:00 PM interval from 1 March through 1 May which has been extended through 30 June (to benefit nesting females and broods) within 4 miles from leks (Little Snake DEIS, page ES-8, Appendix E). Yet, the DEIS allows compressor stations to operate at 2,500 feet of leks.	The Proposed RMP/EIS has been revised to apply a no surface occupancy stipulation within a 0.6 mile radius of a lek site. This would increase the distance that a compressor station could be located by 668 feet. Between 0.6 miles and 4 miles, the restrictions on activities would only apply seasonally, during crucial life periods.
Special Status	Grouse Inc.	There are many inconsistencies in the DEIS on restrictions which	Due to the varied nature of sage-grouse reproductive

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Species		are promoted as benefiting sage-grouse. There must be a clear presentation of restrictions to benefit sage-grouse within one specific page or sequential pages in the DEIS. The dates or distances mentioned in the DEIS are not consistent (see personal Communication from Brad Petch in Section 3.1.7). Those that can be found provide only minimal mitigation during the breeding and nesting periods as there is little monitoring of adherence to these restrictions and those in place can be modified. In actual practice, there is little protection from physical disturbance of habitats useful to sage-grouse nesting outside of the artificial 0.25-mile radius from active leks. Most critically, there is no recognition of the importance of sage-grouse winter use habitat and only minimal stipulations to help protect these habitats (only “within identified winter habitat”).	performance, habitat capability, and conservation threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources. In addition, BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS.
Special Status Species	Grouse Inc.	The BLM also fails to adequately address the cumulative effects on sage-grouse of all treatments (not limited to oil and gas developments).	Analysis of cumulative impacts is adequate for a planning level NEPA document. Site-specific plans will consider cumulative impacts in further detail.
Special Status Species	Grouse Inc.	Nowhere is there mention of the possible negative effects of seismic activities. It appears the BLM has avoided recognition of short-term effects of trails, crushing of vegetation, and direct and indirect impacts to sage-grouse from use of large vehicles involved in this activity. Unfortunately, there apparently have been no studies on the immediate impacts of seismic activities. Until demonstrated otherwise, seismic activities should be considered as factors that are negative for sagebrush habitats as they provide trails for increased predator access, they fragment habitats useful to sage-grouse, they decrease live sagebrush and forbs needed by sage-grouse, and could potentially disrupt breeding and nesting activities.	The Draft RMP/EIS does identify that permitted activities, including mineral exploration, would result in ground disturbance that could, among other impacts, remove or degrade native vegetation and fragment habitats (Draft RMP/EIS page 4-67 and 4-68). Seasonal and no surface occupancy restrictions on seismic activities would be considered on a case-by-case basis to protect sage-grouse during critical time periods. The commenter has not provided any additional substantiated evidence that impacts other than those already noted in the Draft RMP/EIS would occur.
Special Status Species	Grouse Inc.	BLM should require the oil and gas industry to fund well-designed scientific research on the effects of seismic activities on sage-grouse and their habitats.	FLPMA requires BLM to maintain an inventory of the resources on the lands for which it is responsible. While BLM can require permitted public land users to mitigate impacts they have incurred, BLM lacks the legal authority to require public land users to pay for research to determine if their activities are causing impacts. Such research activities would be completed by BLM or other interested stakeholders.

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Special Status Species	Grouse Inc.	Present mitigation measures to protect sage-grouse and their habitats in the existing Little Snake Resource Area DEIS are minimal (Appendices C and O). Those for coal mines (C-6) indicate that lessees are required to mitigate for sage-grouse habitat loss but are not specific. All other mention of mitigation is not specific to sage-grouse and practices have little scientific basis even for reclamation (Appendix O) as there is no intent to reclaim land to be useful for sage-grouse throughout the year for all life processes.	Specific mitigation measures are determined on a project-by-project basis. It is not prudent to identify all possible mitigation measures within this document since there are a variety of site-specific factors that would need to be considered. Some of these factors may be unknown until project specific information is available (i.e., location, duration, size of area impacted, sensitive species present, time of year, etc).
Special Status Species	Grouse Inc.	The BLM should endorse and follow the "Guidelines to manage sage grouse populations and their habitats" (Connelly et al. 2000). Consideration should also be given to following the concluding comments of Braun et al. (2002) that strongly recommend that it is the responsibility of the oil and gas industry to demonstrate their activities have no negative impacts initially, short-term, or over the long-term. Effective mitigation practices, in addition to those in the Guidelines (Connelly et al. 2000), include permanent and seasonal road closures, burial and or modification of power lines, removal or modifications of fences and other structures, fertilization of sage-grouse winter ranges with nitrogen, and reduction or complete permanent elimination of other uses such as livestock grazing, especially on areas where oil and gas production is permitted. Mitigation should also consider those impacts that can be reasonably expected including cumulative (with other factors) effects. Full mitigation would require increasing the number (on a per unit basis) of sage-grouse in non-affected areas to equal the reduction in numbers of sage-grouse in affected areas. Research on developing methodology to enhance sagebrush habitats (to support higher densities of sage-grouse) should also be productive.	The Draft RMP/EIS does identify that permitted activities, including mineral exploration, would result in ground disturbance that could, among other impacts, remove or degrade native vegetation and fragment habitats (Draft RMP/EIS page 4-67 and 4-68). Seasonal and no surface occupancy restrictions on seismic activities would be considered on a case-by-case basis to protect sage-grouse during critical time periods. The commenter has not provided any additional substantiated evidence that impacts other than those already noted in the Draft RMP/EIS would occur.
Special Status Species	Grouse Inc.	The DEIS (Chapter 2, pages 15-19) lists Goals to maintain large patches (8) of high-quality sagebrush habitats without any specific mention of sage-grouse. Further, there is no definition of 'large' or 'high-quality' sagebrush patches. Examination of Map 2-4 reveals the eight patches range from very small (west of County Road 10 and south of the Wyoming State Line) and also south of Yampa in southern Routt County to somewhat larger tracts. Only three areas could be considered 'large' while three others would meet a reasonable definition as small versus very small (2). The area south of Yampa appears to incorrectly place a large number of sage-grouse leks in a very small area; some of these have never met the definition of an active lek (Connelly et al. 2000) and others would appear to represent leks of Columbian Sharp-tailed Grouse	To ensure proper and effective management of the different life stages and requirements of sage-grouse, BLM is currently implementing, and will continue to implement, management strategies identified in BLM National Sage-Grouse Strategy, 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan, and the 2007 Colorado Greater Sage-Grouse Conservation Plan. These plans were based on the best available scientific information. The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible. BLM has updated the

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		(Tympanuchus phasianellus). The same may be partially true for the small area north of Hayden. The very small area west of County Road 10 south of the Wyoming State line contains the Gee Flats lek near a dump site and the Whisky Draw lek, which is immediately adjacent to the Wyoming State Line and draws most of its' birds from Wyoming. This is not a 'large' area of 'high-quality' habitat as the Gee Flats area has been repeatedly subjected to herbicide spraying and constant overgrazing by domestic livestock permitted by the BLM.	management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. High priority habitats are discussed in the revised Section in chapter 2.
Special Status Species	Grouse Inc.	The BLM (DEIS, page 2-16) offers leaseholders to 'opt in' to avoid timing limitation stipulations and would allow year round drilling (oil and gas operators only), provided they agreed to disturb no more that 5% of the surface of the permit area until some time when they could disturb another 5% (this could apparently continue until all of the surface could be disturbed). Unfortunately, this 'agreement' would not consider previous disturbance or other leaseholders, and would not affect other permitted and non permitted actions. This is not mitigation to benefit sage-grouse and would ensure that local populations would be at threat of extirpation. The idea is novel but it has no known scientific basis or merit for sage-grouse.	See General Comment Response #31
Special Status Species	Grouse Inc.	Setting aside of 'large' blocks of 'high-quality' sagebrush habitats as mitigation superficially appears to have merit, provided these areas are truly large (at least the size of Townships or, preferably 50 mi2). However, a defendable definition of 'high-quality' sagebrush habitat useful to sage-grouse must contain all features of areas used by sage-grouse for all annual life processes. Further, there must be reasonable connectivity between and among the 'large' patches of 'high-quality' sagebrush habitats. Map 2-4 does not indicate connectivity is considered in the DEIS.	The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. High priority habitats are discussed in the revised Section in chapter 2. BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. Most studies show that greater sage-grouse require buffers for nesting and breeding habitat. BLM, in partnership with CDOW, has developed habitat management actions to improve and maintain sagebrush habitat functionality by limiting fragmentation. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority habitats. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS

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			for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
Special Status Species	Grouse Inc.	To further mitigate the impacts from the significant oil and gas developments that are being planned for the Little Snake Resource Area, the BLM should also designate, as part of the RMP revision process, multiple Areas of Critical Environmental Concern (ACECs) to protect at least 90% of sage-grouse winter use areas. The boundaries of these areas should follow the results of Recommendation # 1 (Winter) on page 4. [These areas will be critical to maintaining population persistence over time. Suggested areas for ACEC designation include at least all of Blue Mountain and Cold Springs Mountain, an area west of Axial, and a portion of the West Gibraltar area as well as areas used by sage-grouse in severe winters]. I strongly recommend that a full section be developed on mitigation practices to benefit greater sage-grouse. The lack of an adequate mitigation plan and strategies is a major flaw in the DEIS.	In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G. Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives. BLM identified special management for potential ACECs, as directed by BLM Manual 1613-1 Section 12, to protect and prevent irreparable damage to the relevant and important values. The different relevant and important values in the various potential ACECs have required specific management decisions to address the various threats. The management decisions in each ACEC were designed to protect the relevant and important values. The impact to

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			relevant and important values from identified management associated with each ACEC is noted in chapter 4. BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. In addition, before any surface disturbance activity, surveys would be conducted of potential habitat for Colorado BLM Sensitive Species. Should any such species be found, all disruptive activities would be halted until species-specific protective measures were developed and implemented.
Special Status Species	Grouse Inc.	Assessment of the long-term effects of any use or disturbance, especially oil and gas or other energy-related development, on sage-grouse and the health of the sagebrush steppe should be based on collection and analysis of population information in spring, collection and analysis of harvest information, and numbers of birds counted in selected winter habitat. Sage-grouse population statistics collected in spring are those related to number of active leks per unit of area and total number of cocks counted on a sample of randomly selected, statistically defensible accessible leks. Harvest data collection should focus on analysis of wings for changes in ratios of chicks/hen and males to females in both adult (including yearlings if not separable) and chick age classes. Once winter use areas are identified, standardized line transects should be established and	Currently, management of sage-grouse in the RMPPA is guided by BLM National Sage-Grouse Strategy and Northwest Colorado Greater Sage-Grouse Conservation Plan as is reflected in the mitigations proposed in the Draft RMP/EIS. These plans were based on the best available scientific information. Implementation of additional conservation actions from local planning efforts will not be hindered by the finalization of this RMP.

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		annually sampled (using aircraft) following current sampling theory to estimate number of birds present. Sampling should occur immediately following fresh snowfall or during maximum snow accumulation. Changes in vegetation "quality" should be monitored at 3-5 year intervals at a statistically valid sampling rate along permanent 0.6-mile belt transects. Measurements desired include live sagebrush canopy cover, sagebrush height, and ground cover of native grasses and forbs. (This should also include measurement of residual grass height.) Modeling of the potential effects of environmental events such as drought (measured by the Palmer Drought Index) and severe winters (length of period of snow cover, depth of snow, temperature) should also be pursued.	
Special Status Species	Grouse Inc.	Appendix F, Criteria for Subsequent Activity Planning, appears to be the monitoring guidelines (Table F-1) for the DEIS. It is totally inadequate for monitoring and evaluating habitat quality and quantity or for monitoring sage-grouse population health. It is notably deficient as it fails to reassure anyone that scientific protocols will be used and the results will be properly evaluated.	Appendix F does not identify every monitoring activity that will take place during implementation of the RMP, nor does it provide details for how monitoring activities will occur. The identification of specific monitoring methodology and data storage strategies are not RMP-level decisions as identified in BLM's planning handbook (BLM-H-1601-1), but are implementation-level decisions. Therefore, specific monitoring strategies, methodologies, or collection/maintenance issues will be addressed subsequent to finalization of this RMP. BLM will continue to work with CDOW and other stakeholders to monitor the health of sage-grouse populations and habitats.
Special Status Species	Grouse Inc.	The importance of sustained, long-term monitoring cannot be overstated. It is clear that oil and gas development will negatively affect sage-grouse populations (Braun et al. 2002, Holloran 2005) and only the magnitude of the impacts is unknown. The oil and gas industry should fund the monitoring and long-term research needed throughout the life of the project and the Little Snake RMP should make this a specific requirement in any new oil and gas development projects. This critical monitoring should continue until sage-grouse populations return to pre-disturbance levels, which could exceed 30 years. Cause and effect studies using an active adaptive management approach (Walters 1986) are necessary to fully understand the implications of oil and gas development on sage-grouse. The industry has the responsibility to demonstrate their activities have no negative impacts initially, short-term, or over the long-term on the distribution and abundance of sage-grouse in areas explored and developed for oil and gas production.	Bullet 4 of special status species goal A states "Prioritize inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management." Due to unique features of each lease area, specific monitoring measures would be inappropriate for a landscape-scale document. Site-specific monitoring will be described in activity level documents.

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Special Status Species	Grouse Inc.	The DEIS for the Little Snake Resource Management Plan fails to attempt to incorporate even minimal suggestions on identification and protection of winter habitats, brood habitats, or consideration of scientifically defensible buffers for NSO around active leks. The discussion of Monitoring in the DEIS is minimal and consideration of mitigating impacts on sage-grouse is essentially non-existent.	See General Comment Response #31
Special Status Species	Grouse Inc.	None of the 4 Alternatives adequately describe or analyze the expected impacts on sage-grouse distribution and abundance within the Little Snake Resource Area as a result of any specific Alternative or the preferred Alternative	Chapter 4, Impact Analysis, is where the descriptions and analyses of expected impacts on species and resources from the alternatives can be found in the Proposed RMP/Final EIS.
Special Status Species	Grouse Inc.	My professional judgment is that all Alternatives (including the No Action Alternative) will fail to slow or cause the long-term declines in sage-grouse populations to stabilize.	See General Comment Response #31
Special Status Species	Grouse Inc.	Alternative B will increase the declines in distribution and abundance of sage-grouse in the Little Snake Resource Area. No specific mitigation is proposed for sage-grouse other than some timing restrictions, a NSO restriction around active leks, and a 4-mile buffer around leks during the sage-grouse nesting period. Further, all of those identified can be exempted, waived, or modified upon request of the operator.	See General Comment Response #31
Special Status Species	Grouse Inc.	The Adaptive Management planned to be implemented (Appendix M) only describes the process. I know of no situation where sage-grouse have benefited from the adaptive management process. Adaptive management has mostly been used with mixed success in management of harvest of migratory birds.	BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain and restore sage-grouse populations and their habitats.
Special Status Species	Grouse Inc.	It is important to note that Greater sage-grouse are a BLM 'Sensitive' species and a species of concern for the Colorado Division of Wildlife. Yet, I failed to find this species discussed in Appendix J, Special Status Species Conservation Measures and Recommendations. This suggests the BLM does not recognize the interest in this species and its' importance as an indicator of the status of the sagebrush –steppe habitat type.	BMPs for greater sage-grouse are included in chapter 2, special status species, Greater sage-grouse, Alternative C. Sagebrush habitat under Alternative C in chapter 2 has been revised to include more detailed management for this important habitat type.
Special Status Species	Grouse Inc.	The Little Snake Resource Area manages the largest historical expanse of formerly occupied and still lightly occupied sage-grouse habitat in Colorado. The Little Snake Resource Area DEIS should clearly identify the importance of this area for greater sage-grouse and the BLM must accept their responsibility in maintaining and enhancing habitats on public lands within the Resource Area to ensure this species is not further considered for Federal listing under	BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. In support of this responsibility, one of the many conservation goals established for the Little Snake resource management area is to preserve and protect special

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		the Endangered Species Act.	status species, such as the greater sage-grouse. Some of the objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. Specifically regarding the greater sage-grouse, BLM has been a leader in sage-grouse conservation. Because BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States, BLM developed the National Sage-Grouse Habitat Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan that have been developed, identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat.
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Mitigation Measures: 1. The BLM should adopt a policy of no surface disturbance within at least 3 miles of occupied leks as data (Holloran 2005) clearly show negative impacts to sage-grouse at the present distance of 0.25 miles and up to at least 3 miles. This is the	See General Comment Response #31

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		minimum needed to maintain sage-grouse populations.	
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Mitigation Measures: 2. All areas used by sage-grouse during both average or “normal” and severe winters should be located, mapped, and given special protection from wild fire, manipulation of sagebrush, and human-induced disturbance. This is the minimum needed to maintain sage-grouse populations. At least 90% of these newly mapped winter-use areas should be designated as a network of ACECs.	In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G. Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives. BLM identified special management for potential ACECs, as directed by BLM Manual 1613-1 Section 12, to protect and prevent irreparable damage to the relevant and important values. The different relevant and important values in the various potential ACECs have required specific management decisions to address the various threats. The management decisions in each ACEC were designed to protect the relevant and important values. The impact to relevant and important values from identified management associated with each ACEC is noted in chapter 4. BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. BLM would work to improve the status of candidate and sensitive species. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and

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			other scientific studies to better understand the ecology of special status species to improve their management. In addition, before any surface disturbance activity, surveys would be conducted of potential habitat for Colorado BLM Sensitive Species. Should any such species be found, all disruptive activities would be halted until species-specific protective measures were developed and implemented.
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Mitigation Measures: 3. Adherence to time of use for restriction of activities from 5:00 PM through 9:00 AM during the breeding and nesting periods should be strictly monitored and enforced. This is the minimum needed to maintain sage-grouse populations.	Chapter 2 has been revised to include further protection to sage-grouse. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E. BLM considered all alternatives in the planning process, and has expanded Alternative C to include greater protections to sagebrush habitat.
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Mitigation Measures: 4. Management of mid to late summer brood-rearing areas should encourage forb regrowth while maintaining at least a 6 inch residual grass height with taller (> 24 inches in height), live sagebrush of > 15 % canopy cover in close (< 200 yds) proximity for use as escape cover. This is the minimum needed to maintain sage-grouse populations.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Mitigation Measures: 5. Mitigation should be emphasized for all activities, including livestock grazing and coal bed methane production, known to negatively impact sage-grouse. Mitigation measures could include, but are not limited to: burial or modification of power lines, off set drilling, road closures and time restrictions, removal of livestock grazing, nitrogen fertilization of winter and nesting areas, removal or modification of existing fences, etc. Full mitigation would be to replace the exact number of sage-grouse	See General Comment Response #31

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		impacted by development activities by increasing the number per unit of area that the remaining areas can support to equal the number displaced. This is the minimum needed to maintain sage-grouse populations. Mitigation should be better identified within the DEIS with development of a specific section for sage-grouse. A realistic view of the length of time for reclamation as a mitigation tool to benefit sage-grouse should be presented.	
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements 1. Standardized line transects in identified winter use areas should be established and annually sampled (using aircraft) following current sampling theory to estimate changes in numbers of birds present. Sampling should immediately follow fresh snowfall or during maximum snow accumulation.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements 2. Standard surveys of all areas to locate active leks should be conducted in spring 2007 and continue at 3-year intervals. This will provide data on lek extinction and recruitment. This is the minimum needed to monitor sage-grouse populations.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirement 3. All potential mid to late summer brood-rearing areas should be mapped based on moisture and green forb availability during the late June through late August interval. Management of mid to late summer brood-rearing areas should encourage forb regrowth while maintaining at least a 6-inch residual grass height with taller (> 24 inches in height), live sagebrush of > 15% canopy cover in close (< 200 yds) proximity for use as escape cover.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements 4. Leks classified as active should be counted (number of cocks present) 3-4 times each spring at 7-10 day intervals starting in late March-early April and continuing into mid May. Those leks classified as inactive should be checked in late April/early May every 2-3 years to ascertain change in status. This is the minimum needed to monitor sage-grouse populations.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements	See General Comment Response #31

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		5. The vegetation in areas used by sage-grouse during both average and severe winters should be described as to live sagebrush canopy cover, height, etc.	
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements 6. Harvest data based on examination of sage-grouse wings collected from hunters should continue on a well-defined population basis. Statistics needed to measure responses of sage-grouse to treatments and development activities are those relating to nest success, chicks per hen, and age/gender composition. This is the minimum needed to monitor sage-grouse populations.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Monitoring Requirements 7. Research should be initiated to learn if monitoring of insect abundance and forb growth will reliably predict sage-grouse chick survival.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan Analysis and Other Management Issues 1. Habitat guidelines published by Connelly et al. (2000) should be incorporated into preparation of a “desired future condition” to be achieved to improve nest success and early chick sage-grouse survival. This is the minimum needed to enhance sage-grouse populations.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Analysis and Other Management Issues: 2. Replicated long-term studies are urgently needed to understand the effects of grazing practices and habitat fragmentation on predator numbers and predation rates on sage-grouse. These studies must involve treatments and controls on a landscape basis.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Analysis and Other Management Issues 3. Nesting areas are difficult to locate at a population or subpopulation scale and the recommendation to define them as all area within 4 miles of active leks is long overdue. This is the minimum needed to maintain sage-grouse populations.	As noted on Page 2-25 of the Draft RMP/EIS, Alternative C (the Proposed RMP) considers a seasonal stipulation for oil and gas development within a 4-mile radius of the perimeter of a lek.
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: Analysis and Other Management Issues 4. Early chick survival has been identified as a problem in Colorado (and elsewhere). Enhancing the forb and grass component in	See General Comment Response #31

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		nesting areas (which are also early brood rearing sites) should be a priority.	
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: 5. The cumulative impacts of all human-induced activities within a given, defensible sage-grouse population unit should be studied over a period sufficiently long (20-30 years) to be able to predict actual long- and short-term effects. When industry is involved in causing the impacts, they should be expected to fully support, financially, all studies as they have the burden to demonstrate their activities are not negative to sage-grouse.	See General Comment Response #31
Special Status Species	Grouse Inc.	Key Recommendations for the DEIS for the Little Snake Resource Management Plan: 6. Well-designed research on the immediate and short-term effects of seismic activities on sage-grouse and their habitats should be funded and undertaken.	See General Comment Response #31
Special Status Species	Rick Hammel	2.5.6.2 Management Actions Greater Sage-grouse Page 2-25 In the second paragraph of this page, the word "encouraged" is used in relationship to the use of BMPs. This whole section is designed to conserve the population of the sage grouse. During the meetings of Northwest Colorado Stewardship (NWCOS), the energy industry representatives stated on more than one occasion, that BMPs are voluntary. As a voluntary action, BMPs are not enforceable. As an action to prevent this species from being listed as threatened or endangered, these BMPs must be mandatory, particularly in the COA. Should this bird get listed, the recovery plan will be far more stringent.	BLM will determine on a case-by-case basis when BMPs would be required of a lessee or operator. Circumstances that may warrant such requirements are when; disturbance reaches 10% of nesting habitat within the 4-mile radius of an active lek, activities may affect the integrity of the sagebrush biome or other important components of sage-grouse habitat. All the existing BMPs would also be required of an operator in order for them to obtain an exception to sage-grouse nesting and critical winter range timing limitations. If an operator or lessee does not implement required BMPs, then BLM would no longer grant exceptions to timing stipulations and would issue noncompliance to the leaseholder. One of the many conservation goals within the Little Snake resource management area is to preserve and protect special status species. Objectives that have been established for achieving this goal include maintaining the populations of sensitive species at levels that would avoid having to in the future list these species as threatened or endangered; maintaining, restoring, or enhancing the habitat of

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			special status species; maintaining or restoring the populations of special status species to the extent possible; and prioritizing inventories, monitoring, and other scientific studies to better understand the ecology of special status species to improve their management. Therefore, BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain, and restore sage-grouse populations and their habitats.
Special Status Species	Rick Hammel	While Alternative C for the Greater Sage Grouse is very well laid out and offer some real protection, we feel that Alternative D is needed in preventing the sage grouse from getting listed of the endangered species list under the ESA. However, the 0.6 mile NSO from the leks is, in the words of researchers, not enough distance to say there will be no impacts on leks (Naugle 2005; Holloran 2005). To protect the greater sage grouse from any more additional threats, we are expressing the need for the BLM to institute the following: Establish a one mile radius NSO around all leks within the RMPPA Suspend all future oil and gas leasing. No winter drilling in the large sagebrush patches (Map 2-4) No more than 1.2% disturbance per lease 640 acre wellpad spacing. One mile of road per square mile. No off-site mitigation. Patches (from east) 2,3 and 6 are the most important to sage grouse and must be protected from further development	BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority habitats. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of

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			a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
Special Status Species	Rick Hammel	Black-Footed Ferret Page 2-26: Even though the black-footed ferret (BFF) is listed as an endangered, non-essential experimental species (Section 10j of the ESA), protections must be afforded this species that are above and beyond ordinary wildlife protections. Drilling for gas and oil within their habitat is not acceptable. Life goes on in spite of the BFF presence. However new and unanticipated impacts that are beginning to occur in BFF habitat, such as drilling. These impacts were not anticipated at the time the recovery plan was implemented. Alternative D does not reflect the above and we feel that the BLM must write this Alternative to reflect added protection to the BFF.	See General Comment Response #7
Special Status Species	Independent Petroleum Association of Mountain States (IPAMS)	a. Sage Grouse Buffer Zones The buffer zone specified in Table 2-46, page 2-132-124, Alternative C, would be extended from the current two-mile radius to a four-mile radius. IPAMS believes this buffer is excessive; sage grouse populations have grown within the planning area with the current two-mile radius. The two-mile buffer should be incorporated into Alternative C.	Site specific studies from throughout the west were taken into consideration while developing management prescriptions for the sage-grouse. In addition, the professional experience of CDOW wildlife biologists with years of experience with sage-grouse behavior in the Little Snake Field Office identified information that indicated that a larger seasonal buffer was needed to protect a larger proportion of nesting greater sage-grouse.
Special Status Species	Moffat County Commissioners	p. 2-16 Sagebrush Habitat Fragmentation proposal. Moffat County was a key partner in creating the Sagebrush Fragmentation proposal. We support it fully and further request the Sagebrush Habitat Fragmentation Proposal apply to the entire resource area rather than only to 4 miles around Sage Grouse Leks and priority sagebrush areas. Since the 5% proposal is voluntary on existing leases this simply provides additional incentives for gas companies across the resource area to reclaim quickly rather than limiting it to only Sage Grouse areas. Several ecological justifications can be made for expanding this proposal, such as faster reclamation incentives resource wide.	BLM has updated the management of sagebrush habitat in Alternative C in chapter of the Proposed RMP/Final EIS. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority sagebrush habitats. The highest priority habitats consist of sage-grouse core areas, which include 4-mile lek radii around the largest leks, portions of sage-grouse winter range, and portions of big game winter range. Medium priority habitats are defined as consisting of big game winter concentration areas, severe winter range, migration corridors, sage-grouse winter range, sage-grouse breeding habitat, and areas within the 4-mile radius of leks located outside of the sage-grouse core areas. While high and medium priority sagebrush habitats do have timing limitation stipulations associated with them, low priority habitats do not. Therefore, without the ability to grant exceptions to timing limitations in these low priority areas, there

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			would be no incentive for oil and gas operators to opt into the voluntary approach. It did not make sense to include areas in the voluntary sagebrush protection approach that do not have wildlife timing stipulations.
Special Status Species	Moffat County Commissioners	p.2-23 Colorado BLM Sensitive Species Moffat County requests that the adaptive management appendix be referenced in Alternative C. Currently there is no adaptive option in this section. Although state regulations require certain standards for BLM sensitive species, surely it makes sense to allow a land user to offer up a better solution than stipulations.	Page 2-7 of the Draft RMP/EIS says “Alternative C would be implemented using the principles of adaptive management.”
Special Status Species	Moffat County Commissioners	2-26 Black-Footed Ferret (BFF). Although the Black Footed-Ferret Plan does suggest minimal disturbance for 3-4 months within a ¼ mile of release sites, the BFF Plan's intent was not to reroute power lines or rights of way on public land around BFF habitat. Therefore Moffat County strongly objects to rerouting rights of way around BFF habitat and we request that all the alternatives be reworded to allow rights of way through BFF habitat, as the BFF Plan intended. Furthermore it is our belief that the spirit of Non-Essential Designation, through Section 10J of the Endangered Species Act, is reintroduction of BFFs specifically means other land uses are not impacted because the BFFs are merely experimental to see if they can 'get along' with existing uses. Therefore ¼ mile buffers around BFF release sites for 3-4 months was entirely voluntary and 'recommended' in the BFF plan and BLM should not be placing these as required stipulations, only recommendations.	See General Comment Response #7
Special Status Species	Moffat County Commissioners	2) Table 2-44 restricts surface disturbing activities against the intent of the Black Footed Ferret Plan in prairie dog colonies. Although the Black Footed-Ferret Plan does suggest minimal disturbance for 3-4 months within a ¼ mile of release sites, the BFF Plan's intent was not restrict surface use. The BFF Plan is a "live and let live" document. Therefore Moffat County strongly objects presenting Prairie Dog colonies as a restriction for surface disturbing activities around BFF habitat and we request that all the tables be modified to not allow Prairie Dog restrictions in the name of BFFs. Furthermore it is our belief that the spirit of Non-Essential Designation through Section 10J of the Endangered Species Act is that reintroduction of BFFs specifically means that other land uses are not impacted because the BFFs are merely experimental to see if they can 'get along' with existing uses.	See General Comment Response #7

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Special Status Species	Moffat County Commissioners	p. 3-40 Mammals-White Tailed Prairie Dog. Although the statement in the table is true, white-tailed prairie dogs are associated with Black Footed Ferrets, this table misleads the reader to think the white tailed prairie dog has earned additional status because of the Black Footed Ferret. This is not true according the Black Footed Ferret Plan. The Prairie Dog should not receive special attention because of its prey. Section 10J of the Endangered Species Act prevents the Black Footed Ferret from elevating the prairie dog to a more valued species than prior to introductions. Please make this clarification in the table, so readers are not misled.	The white-tailed prairie dog is not a species of concern solely because of its association with the black-footed ferret. The Proposed RMP/Final EIS has been modified to clarify this.
Special Status Species	Moffat County Commissioners	p. 4-130. Second Paragraph from the bottom, regarding prairie dog complexes in Black Footed Ferret Habitat. Moffat County requests the RMP clarify that the RMP shall not specifically manage prairie dog habitat for Black Footed Ferret management. This section gives the reader the impression that prairie dogs will be the primary reason for management, and hence address impacts to prairie dogs. We suggest deleting this section, based on the above three comments regarding BFF and prairie dogs.	The 1991 Colorado Oil and Gas Leasing and Development EIS and RMP Amendment, page E-12, stipulates: “No surface disturbance activities will be allowed that may significantly alter the prairie dog complex making it unsuitable for reintroduction of the black-footed ferret.” The Black-footed Ferret Management Plan Amendment did not reinforce nor repeal this stipulation. The plan does recognize valid existing rights, including lease rights. The white-tailed prairie dog is not a species of primary interest solely because of its association with the black-footed ferret. The Proposed RMP/Final EIS has been modified to clarify this.
Special Status Species	David & Tresa Moulton	The LSRA contains the largest, healthiest Greater Sage-Grouse lek complex in Colorado. As a birder, I am concerned that the decline in Greater Sage-Grouse population precipitated by oil and gas development in other parts of the state will most likely occur in the LSRA unless additional protection is made part of the RMP. I recommend that BLM designate the proposed "Sage Grouse Conservation" area as an Area of Critical Environmental Concern to protect the area's thriving lek complex. In addition, BLM should require the following within four miles of greater sage-grouse leks and/or within crucial big game winter habitat: Increase the No Surface Occupancy zone for sage grouse leks in accordance with recent research about the recent research about the recent effects of drilling. Lower the BLMs proposed surface disturbance threshold to 1.25% (which corresponds to 640-acre well pad spacing and 1 mile/sq mile road density), including all existing disturbance in calculations, and make the 1.25% absolute. If monitoring shows that restoration is not successful or there is not sufficient funding to carry out inspection and monitoring, then cap surface disturbance at a	BLM has reviewed the Sage-Grouse Conservation ACEC nomination for relevant and important values. As noted in the Draft RMP/EIS Appendix G, the area failed to meet importance criteria. BLM has updated the management for greater sage-grouse in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat.

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		maximum of one well per 640 acres. Require best management practices such as directional drilling as outlined in the Wildlife Protection Guidelines for Oil and Gas Development (2006) developed by 36 sportsmen and other wildlife conservation groups in Colorado. Do not allow-off-site and compensatory mitigation as a tradeoff for habitat fragmentation and degradation. Once disturbed, this land cannot be effectively reclaimed.	
Special Status Species	NW Colorado Oil and Gas Association	Petroleum Association of Wyoming (PAW) further suggested that protection of the best nesting and brood rearing habitat within 3 miles of a lek would provide protection of habitat while allowing for oil and gas development. Ch. 3 – (pg. 3-60) Greater Sage-grouse (BLM sensitive): Pg 3-61 states that populations in Colorado have increased even though lek size has decreased; populations are relatively stable to increasing in 2003 and the greater sage-grouse in Colorado have been generally increasing for about the last 17 years and breeding populations have not declines for the last 39 years. All this suggests that the sage-grouse is doing well in north western Colorado in spite of oil and gas activity and that the current 2 mile radius must be providing some level of protection. Pg. 3-67 Greater Sage-grouse Management: second paragraph discusses the National Sage-grouse Management Plan released in November 2004. This document states “This land use plan guidance may be supplemented, as appropriate, with additional information from completed state or local-level sage-grouse strategies or plans” and directs local BLM planning offices to “Initiate collaborative discussions and dialogue with the local WAFWA working groups and other partners to develop objectives, management actions, and mitigation specific to the high priority planning area(s) in your state(s). Include the best available science (e.g. Miller and Eddleman, Connelly guidelines, Birds of the Sagebrush Sea, etc.), Best Management Practices, locally available data, and other guidelines and information appropriate to sage-grouse and its habitat.” Considering the 4-mile radius was not considered necessary by the local sage-grouse planning group, the proposal should be changed to with the current two mile or the more protective 3-mile with avoidance of high quality habitats. Ch. 4 – Pg. 4-80; For all the reasons stated above the 4 mile radius and the limitation on disturbance area (5%) are not supported by the current information regarding grouse response to gas development activity on the Pinedale Anticline. The stated 51% decline in male lek attendance included leks purposefully impacted by BLM to determine the efficacy of the 2 mile and ¼ mile stipulations. The leks protected using the stipulations continue to support breeding	See General Comment Response #31

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		behavior when those that were impacted went to zero. Further, the work by Kaiser (2006) contradicts the findings of Lyon 2000 regarding nest initiation and early brood survival within gas development areas.	
Special Status Species	NW Colorado Oil and Gas Association	p.ES-8 Fish and Wildlife Habitat and Special Species Status also refer to 2-132-2-135-Sage Grouse: We have disagreed with the 4-mile radius since the beginning of this planning process. We have also brought forth scientific information that proves nesting and brood rearing habitat does not increase to the value as stated in your report. Renee Taylor, will bring forth the information again in another document. In Moffat County the sage grouse population has increased during a period when the BLM standard sage-grouse stipulations protect the nesting and brood rearing habitat within the 2 mile radius of a lek are in place. This same population increase is being throughout Wyoming, likely in response to improved spring precipitation. We recognize that the proposed 4 mile radius is not an NSO, but from March 1 to June 30 sage-grouse nesting and early brood-rearing habitat would be designated as controlled surface use for oil and gas exploration and development and avoidance areas (site-specific relocation). We know the actual area to be avoided would be case by case, but it would take a great deal of time and effort on the ground to map the habitat within the 4 miles. There is evidence that the two mile radius reduces impacts of oil and gas development on sages-grouse is protective, as an alternative to a 4 mile lek radius we propose a three mile CSU/SSR based on habitat mapping. This would protect approximately 66% of the nesting hens. The BMPs listed on page 2-133, 2-134 follow the draft Northwest Colorado Greater Sage Grouse Conservation Plan which the oil and gas industry helped in developing. BLM was directed in the National Sage-grouse strategy to work with the local plans for sage-grouse conservation. A 4-mile radius was not discussed or recommended in the NW Colorado Greater Sage Grouse Conservation Plan.	BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. Most studies show that greater sage-grouse require buffers for nesting and breeding habitat. BLM, in partnership with CDOW, has prepared habitat management for sagebrush functionality, updated in the Proposed RMP/Final EIS. BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. BLM feels there is sufficient evidence to warrant the restrictions found in the Proposed RMP (Alternative C).
Special Status Species	NW Colorado Oil and Gas Association	ES-9 White Tailed Prairie Dog- also referred to page 2-41 Alternative C: We do not support Alternative C to protect prairie dog towns less than 10 acres in size and timing limitation stipulations to apply to towns greater than 10 acres in size. We support Moffat County and there is no available science backing that prairie dogs are a rare species or special species. As a matter of fact the Wildlife Commission placed a hunting season on the prairie dogs due to political pressure and there was no science to back that up. They state that shooting prairie dogs does not harm the population nor	See General Comment Response #7

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		does the disturbance. We agree with Moffat County that Alternative A should be the preferred alternative for prairie dogs.	
Special Status Species	NW Colorado Oil and Gas Association	p.2-23 Special Species Status-Colorado BLM Sensitive Species The basis of this plan is Adaptive Management and this is a good place to utilize this tool. In Preferred Alternative C, add a referral to adaptive management appendix, instead of halting any surface disturbing activities to protect sensitive species. The activity should be able to co-exist and using adaptive management would give us the science and monitoring to protect the species.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised surface reclamation performance standards of the Proposed RMP/Final EIS. If Sensitive Species are found within an area where surface disturbing activities are to occur, all disruptive activities would be halted until species-specific protective measures were developed and implemented. The halting of such activities would not be permanent. In addition, if any rare plant communities are found in such areas, all disruptive activities would be delayed until appropriate specific protective measures were developed and implemented.
Special Status Species	NW Colorado Oil and Gas Association	p. 2-26-Black Footed Ferret-My understanding of the plan for the release of the Black Footed Ferret was non-essential, experimental. In other words, this animal would co-exist with its surroundings and not be protected. Now what I am reading is that we are protecting the landscape disturbance of the food source of the black footed ferret, the prairie dog. We strongly object to this and agree with Moffat County and it is our belief that the non-essential, experimental designation through Section 10J of the Endangered Species Act, is reintroduction of the black footed ferret means that other land uses are not impacted because the black footed ferret are experimental and they must co-exist with other uses.	See General Comment Response #7
Special Status Species	NW Colorado Oil and Gas Association	p-130-second paragraph from the bottom beginning with no surface disturbance activities would be allowed… Eliminate entire paragraph. Black footed ferret from the reintroduction and the grass roots effort planning group was developed for non essential experimental. There is science in the Rangely field stating that disturbance enhances the prairie dog colonies. Black footed ferrets are to co-exist with other uses and users.	See General Comment Response #7
Special Status Species	NW Colorado Oil and Gas Association	We refer you to Kaiser, R. C. 2006. Recruitment by greater sage-grouse in association with natural gas development in Western Wyoming. Thesis, University of Wyoming, Laramie, USA. Kaiser found that sage-grouse continue to breed and nest in the intensely developing area of the Pinedale Anticline natural gas field in spite of earlier predictions by Holloran (2005) and Lyon (2000) that the birds would be extirpated from the area. Kaiser (2006) did not find consistent negative effects from development activity; for example:	See General Comment Response #31

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		- “hens continued to breed and initiate nests despite natural gas development”, - “nesting success for both adult and yearling hens was relatively consistent for birds that bred or nested within the buffered region” and - “early brood rearing success was higher for both adult and yearling birds within the buffers, but during the late brood rearing period, adult and yearling hens that bred within buffered region or nesting buffer had few and smaller brood than hens that bred or nesting outside the buffers.” But he found that “overall productivity appeared to be influenced by development” but also stated “Survival estimates suggested relatively low mortality throughout the study region” indicating that displacement of birds from the development area is not having the negative impacts on the population that might result from “artificially high populations caused by the shifting of some of the juvenile cohort” as hypothesized by Holloran and Anderson (2005). The following graph, identified as Figure 6, provides insight as to the status of the birds within the Pinedale Anticline development area as of 2006. Displacement is suggested following the increase in development activity that occurred in 1998. The lines identified as affected with and not affected represent the average male lek attendance on those leks that are within development (treatment) and those outside (control). Note that even in this highly developed area with intense levels of disturbance the birds are increasing. Analysis of the Wyoming Game and Fish and Wyoming Oil and Gas Conservation Commission data indicates that sage-grouse populations in developed field areas are stable and increasing even after 20 or more years of development and production. The following graph indicates seven field development areas in Wyoming of various ages, development densities, landownership and implementation/use of BLM stipulations. Each line represents the average male lek attendance within the boundaries of the producing field, in no case do we see sage-grouse populations going to zero. It is evident that the grouse populations throughout the state are following the same trends regardless of the development scenario. When each field is analyzed independently we see similar trends as those seen in Pinedale, those leks with greater than 10 wells drilled within the 2 mile radius have a lower average male lek attendance but the affected/impacted leks are stable and increasing, the Wamsutter field area (north of the Little Snake Resource area) is the	

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		example found below. Petroleum Association of Wyoming (PAW) presented information to the Wyoming BLM State Office in 2004 regarding the effectiveness of a larger radius of protection for nesting sage-grouse. The discussion included a cost benefit analysis and return on investment when the radius extended beyond 2 miles. The data used was extracted from studies undertaken by the University of Wyoming Wildlife Cooperative on behalf of Wyoming Game and Fish Department, and Lyon 2000. These data consisted of the distances from the lek of 247 nesting hens on study areas in the vicinity of Casper, Farson, Pinedale, and Rawlins.	
Special Status Species	NW Colorado Oil and Gas Association	Sage Grouse Winter Habitat Area Protection: Winter sage-grouse habitats are mentioned very briefly in the document with the exception of mapping (Map 3-19) and the stipulations table found on pg 2-135. No definition of “crucial winter habitat” is provided, the map illustrates “winter range” not crucial habitats and Table 3-15 enumerates range-wide winter habitat characteristics from Connelly 2004 not from the local area. Therefore, it is not possible to determine what areas are deemed crucial winter habitat and to be closed from December 16 to March 15, no support is given for the proposal and no exceptions would be allowed. We suggest using avoidance of crucial winter habitats as identified in Vegetation and Habitat Analysis for Crucial Wintering Areas for Greater Sage-Grouse, 2006, Hayden-Wing Associates, prepared for US Department of Energy, National Energy Technology Laboratory.	The winter habitat identified in Map 3-19 is considered crucial winter habitat for the greater sage-grouse at this time. Therefore, restrictions placed on winter habitat under Alternative C for greater sage-grouse applies to the winter habitat identified. Subsequent site-specific habitat mapping could serve to further define areas which constitute crucial winter habitat. Alternative C allows for exceptions to the winter timing limitation stipulation.
Special Status Species	NW Colorado Oil and Gas Association	Further, we find no stipulations in the existing RMP or its revisions regarding closure of crucial winter habitat from December 15 to March 15, therefore it cannot represent the current condition or the Alternative A No Action Alternative. The addition of this closure period for undefined habitat is not justified in the document.	The Colorado Oil and Gas Leasing and Development Amendment ROD (1991), page 19, notes the timing stipulation for greater sage-grouse crucial winter habitat is December 16 to March 15. This is the same date used on page 2-24 of the Draft RMP/EIS, for Alternative A.
Special Status Species	NW Colorado Oil and Gas Association	Greater Sage-grouse Timing Stipulations: When the crucial winter habitat restrictions are combined with the breeding, nesting and brood rearing timing limitations there are 6.5 months (December 15 to June 30) of restrictions compared to the previous 3 month stipulation. This extension of not adequately supported in the document.	The Colorado Oil and Gas Leasing and Development Amendment ROD (1991), pages 19 and 22-23, notes the timing stipulation for greater sage-grouse crucial winter habitat (December 16 to March 15) and nesting grouse species habitat (March 1 to June 30). These are the same dates used on page 2-24 of the Draft RMP/EIS, for Alternative A.
Special Status	Public Lands	While we recognize that Sage grouse are a species of concern, they are not a listed species and the Colorado Division of Wildlife	Species are designated as a BLM special status species by BLM’s state director. BLM is required to

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Species	Advocacy	continues to issue seasonal hunting permits. It is of concern that BLM appears to have arbitrarily extended the seasonal limitation for Sage grouse protection from 4 months to 6½ months. According to Alternative A (current management), BLM states Sage grouse restrictions begin December 16 and conclude June 30. Upon review of the revised Little Snake RMP completed in 1991 and reevaluated in 2001, seasonal stipulations for Sage grouse were only to be applied from March 15 to May 15. It would appear that significant changes occurred at some time, but no information supporting the extended seasonal restriction is included in the DEIS. Justification needs to be included in the FEIS or the additional timing limitation should be eliminated. In addition, the stipulation maps depict winter range while the DEIS discusses the need to protect "crucial winter habitat." However, it is unclear what constitutes crucial winter habitat because it is not defined in the document.	manage habitat to sustain the health and viability of threatened, endangered and special status species while balancing multiple use of public land. BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. The best available research supports the restrictions found in the Alternative C. "Crucial winter range" is defined in chapter 7 of the Proposed RMP/Final EIS and is interchangeable with "crucial winter habitat." The winter habitat identified in Map 3-19 is considered crucial winter habitat for greater sage-grouse.
Special Status Species	Public Lands Advocacy	We do not support the unsubstantiated expansion of the radius around Sage grouse leks from 2 miles to 4 miles. The DEIS indicates this expansion is based upon a "personal communication" from Brad Petch of the Colorado Division of Wildlife. A personal opinion hardly trumps site-specific, scientific studies that have been conducted in Wyoming in and around developed natural gas fields. Moreover, the DEIS states in Chapter 3 that Sage grouse populations in Colorado have increased even though lek size has decreased. It is further stated that "populations are relatively stable to increasing in 2003 and that greater Sage grouse in Colorado have been generally increasing for the last 17 years and breeding populations have not declined for the last 39 years." Clearly, BLM is proposing management schemes that go far beyond what is necessary to protect the Sage grouse.	Site specific studies from throughout the west were taken into consideration while developing management prescriptions for the sage-grouse. In addition, the professional experience of CDOW wildlife biologists with years of experience with sage-grouse behavior in the Little Snake Field Office identified information that indicated that a larger seasonal buffer was needed to protect the greater sage-grouse.
Special Status Species	Public Lands Advocacy	Even though the Lyon (2000) and Holloran (2005) studies predicted that sage-grouse would be eliminated in the highly developed Pinedale Anticline, a more recent study conducted by R. C. Kaiser in 2006, found this was not the case. In fact, Kaiser's study, Recruitment by greater sage-grouse in association with natural gas development in Western Wyoming, Thesis, University of Wyoming, Laramie, found that sage-grouse still breed and nest in the intensely developed fields where the 2-mile radius is used. Specifically, Kaiser found that: • "hens continued to breed and initiate nests despite natural gas development" • "nesting success for both adult and yearling hens was relatively	BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. The best available research supports the restrictions found in the Proposed RMP/Final EIS, Alternative C.

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		consistent for birds that bred or nested within the buffered region” • “early brood rearing success was higher for both adult and yearling birds within the buffers, but during the late brood rearing period, adult and yearling hens that bred within buffered region or nesting buffer had few and smaller brood than hens that bred or nesting outside the buffers” While Kaiser found that the Sage grouse were indeed affected by the development, survival estimates showed comparatively low mortality rates throughout the study area which demonstrates that displacement from the development area is not having the negative impacts on the Sage grouse population predicted by Holloran and Anderson. This finding is supported by an analysis of data collected by the Wyoming Game and Fish Department as well as the Wyoming Oil and Gas Conservation Commission where it was found that Sage grouse populations in developed fields are either stable or actually increasing. Therefore, we strongly urge BLM to return to a 2-mile radius around Sage grouse leks because the 4-mile radius has no scientific basis.	
Special Status Species	Questar, Rockies Region	1. Sage-grouse Protection The conditional surface use (CSU) buffer expansion to a 4.0 mile radius surrounding sage-grouse leks for nesting and brood rearing is excessively restrictive and contradicts existing, well established protocol found in recent BLM RMP and EIS decisions and the science upon which those decisions are based (Wallestad and Pyrah 1974, Braun et al. 1977). Further, the document indicates the CSU buffer is being expanded based solely on a personal communication with B. Petch and not any peer-reviewed scientific study. The current 2.0-mile buffer has adequately maintained sage-grouse numbers in Colorado as evidenced in Figure 3-3 (p. 3-62) of the DEIS. As noted, sage-grouse populations have been generally increasing for about the last 17 years and breeding populations have not declined for the last 39 years (p. 3-61). The current monitoring efforts and research projects in place show that sage-grouse numbers have been stable or are increasing across the west. In a report titled "Conserving the Greater Sage Grouse" which was prepared by the Western Governors' Association and the USDA-Natural Resources Conservation Service, it is noted that "Sage Grouse male counts in northwest Colorado have exceeded 2100 males per year since 2000 approaching levels not seen since the late 1970's." Even in areas where relatively higher levels of development occur,	Site specific studies from throughout the west were taken into consideration while developing management prescriptions for the sage-grouse. In addition, the professional experience of CDOW wildlife biologists with years of experience with sage-grouse behavior in the Little Snake Field Office identified information that indicated a larger seasonal buffer was needed to protect a larger proportion of nesting greater sage-grouse. The management actions in chapter 2 contain specific prescriptions for low, medium, and high priority habitats. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1%

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		monitoring efforts indicate increasing or stable sage-grouse populations. For example, within Questar's Pinedale Anticline Project Area in Southwestern Wyoming, which has seen considerable oil and gas development since 2000, spring 2006 male grouse numbers on the 31 agency-monitored leks were the highest on record since accelerated development began in 2000 (1,559 birds in spring 2000 versus 1,873 birds in spring 2006); relatively consistent monitoring protocol were applied in all years. Similar to current practice by the LSFO, a 0.25-mile active lek No Surface Occupancy (NSO) buffer and a 2.0-mile CSU seasonal avoidance area are generally applied on the Pinedale Anticline. Furthermore, only 8 of the 31 leks are considered to have declining trends while 7 leks appear to be increasing in abundance (2006 Wildlife Studies, Pinedale Anticline Project by TRC Mariah Associates, Inc. 2007). Notwithstanding its view that the 4.0 mile buffer around sage grouse leks is unwarranted, Questar also objects to this doubling of buffer size which will create more work, time, effort and expense on both the BLM and Operators. The DEIS allows for stipulation exceptions within the 4-mile buffer on a case-by-case basis. Questar would be obligated to submit exception requests to allow for efficient and orderly development within the LSFO for every well location as the 4-mile buffer areas cover nearly all of Questar's leasehold within the Project Area. The exception process would require a biologist to conduct extensive and time intensive field surveys within the 4-mile buffer mapping potential sage-grouse habitat for each well location. Since the current 2-mile buffer has sufficiently maintained sage grouse populations within Moffat County and other areas of the country, Questar believes this is not justified. Recommendation: Remove the expansion of nesting and breeding buffer to a 4.0-mile radius around the perimeter of leks. Continue to use the proven adequate nesting and breeding buffer of a 2.0-mile radius.	disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
Special Status Species	Questar, Rockies Region	7. Black Footed Ferret When the Black Footed Ferret population was reintroduced within the LSFO, it was classified as non-essential, experimental. This classification was used to avoid impacts to other land uses. On page 2-27, the DEIS calls for minimization of surface disturbing activities that may affect prairie dog habitat for the black-footed ferret, and goes on to require compensation and development plans within the black-footed ferret management area as well as on-site and off-site mitigation, if necessary. The experimental black-footed ferret population within the LSFO was intended to co-exist with the	See General Comment Response #7

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		multiple uses already occurring on public lands the DEIS restrictions on surface disturbing activities in these areas are unfounded. Recommendation: Remove all requirements that restrict surface disturbing activities based on impacts to black-footed ferrets, as well as any language requiring compensation or mitigation for surface disturbing activities.	
Special Status Species	Questar, Rockies Region	Page 2-24, Section 2.5.6.2: Nesting and breeding buffer from a 4.0 mile CSU radius around leks should remain the existing 2.0 mile CSU buffer that has been used in all other management plans. This change should be made document wide.	Site specific studies from throughout the west were taken into consideration while developing management prescriptions for the sage-grouse. In addition, the professional experience of CDOW wildlife biologists with years of experience with sage-grouse behavior in the Little Snake Field Office identified information that indicated that a larger seasonal buffer was needed to protect a larger proportion of nesting greater sage-grouse.
Special Status Species	Becky Raney	Alternative C should not be used to protect prairie dog towns less than 10 acres in size. BLM should look to Moffat County's scientific backing that prairie dogs are not a rare/special species.	See General Comment Response #7
Special Status Species	The Nature Conservancy in Colorado	We appreciate the challenges that BLM faces in meeting its mandate “to sustain the health, diversity and productivity of the public lands….” To ensure that BLM can meet this mandate and achieve stated RMP goals, we would strongly urge BLM to modify the plan to: A. Ensure the successful maintenance or restoration of large patches of functional habitat, as indicated by large and viable populations of sage-grouse, prairie dogs, rare plants and plant communities, and other key species. B. Strengthen reclamation requirements to meet land health standards. C. Strengthen the adaptive management provisions by allocating land uses more conservatively at first; quantifying desired outcomes, describing monitoring in greater detail, and identifying thresholds for change; and more clearly defining criteria for exception, waiver, and modification in Appendix E.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain and restore sage-grouse populations and their habitats. The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible.
Special Status Species	The Nature Conservancy in Colorado	The preferred alternative contains a variety of mitigation measures for sage-grouse and other species, including a number of goals and objectives for maintaining or restoring large habitat blocks. Such goals, objectives, and/or management actions must be quantitative, however, to provide BLM and the public with clear guidance on the allowable extent of resource uses. We strongly urge BLM to quantify	Mitigative measures in Alternative C of the Proposed RMP/Final EIS have been developed in consultation with USFWS and the CDOW. If it is determined in the future that these measures are ineffective BLM would amend the RMP to incorporate new information and revise the mitigative measures at

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		desired outcomes and management actions throughout the plan, and especially those that will ensure the maintenance or restoration of large habitat blocks. Such information will allow BLM and the public to effectively manage for large patches of quality habitat, which is a stated goal of the RMP. The maintenance of large and functional blocks of habitat is a prudent approach to the conservation of sensitive species. It has been shown in many studies that fragmentation, especially from roads, leads to changes in species composition and population size (Trombulak and Frissell 2000).	that time.
Special Status Species	The Nature Conservancy in Colorado	b. Limitations of current provisions for large and intact blocks of sagebrush: i. Timing limitations for sage-grouse and reducing fragmentation from energy development benefit sage-grouse in different ways, so they are not substitutes for one another. As BLM is aware, timing limitations will reduce or eliminate disturbance to sage-grouse in certain locales at important times in the species' life cycle (lekking, nesting, brood-rearing, etc.). Reducing fragmentation alone is inadequate to avoid negative impacts to sage-grouse populations (Holloran 2005).	See General Comment Response #31
Special Status Species	The Nature Conservancy in Colorado	ii. BLM aims to create "functional blocks of sagebrush," but the optional fragmentation provision (disturb <5%) could allow for oil and gas development throughout sagebrush without leaving enough large and undisturbed blocks of habitat to maintain viable populations of sage-grouse and potentially other sagebrush obligates. BLM must define "functional blocks." According to the Colorado Natural Heritage Program (2005), a minimum-sized patch of inter-mountain basins big sagebrush shrubland is at least 30,000 acres to provide habitat for sagebrush-dependent species. Ideally patches should be more than 80,000 acres (CNHP 2005). Even with mitigation measures, the plan allows oil and gas development to occur nearly everywhere across the landscape, with the primary exception of 0.25 miles of no surface occupancy around leks.	The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible. BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. Most studies show that greater sage-grouse require buffers for nesting and breeding habitat. BLM, in partnership with CDOW, has developed habitat management actions to improve and maintain sagebrush habitat functionality by limiting fragmentation. These management actions are included in chapter 2. The management actions contain specific prescriptions for low, medium, and high priority habitats. Below is a summary of the management actions that apply to new leases. Refer to the Proposed RMP/Final EIS for a complete description of the management actions. Management prescriptions for low priority habitats would allow oil and gas

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			development to proceed and described in the Proposed RMP with appropriate stipulations applying. Management prescriptions for medium priority habitats would allow oil and gas development with a 5% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. Management prescriptions for high priority habitats would allow oil and gas development with a 1% disturbance limitation and a strategy to leave large blocks of undisturbed habitat. To reduce potential impacts on greater sage-grouse lek integrity, the Proposed RMP also includes a no surface occupancy stipulation within a 0.6-mile radius of a lek site. In addition, greater sage-grouse nesting and early brood-rearing habitat would be stipulated to have a seasonal timing stipulation between March 1 and June 30 within a 4-mile radius of the perimeter of a lek. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
Special Status Species	The Nature Conservancy in Colorado	iii. Research demonstrates that NSO of 0.25 miles is not an adequate buffer for avoiding negative impacts to sage-grouse (Braun et al. 2002, Holloran 2005).	Alternative C in chapter 2 for sagebrush functionality has been revised to include a NSO within a 0.6 mile radius of a lek site.
Special Status Species	The Nature Conservancy in Colorado	iv. Current provisions may not allow for necessary or desired adjustments in an adaptive management approach to leasing and development based on population trends of sage-grouse. If the population is stable within the planning area but significantly declines in the range as a whole, the Little Snake populations would become even more important to the persistence of the species (which would in turn warrant additional conservation measures for the Little Snake populations). RMP provisions should be flexible enough to address this potential issue.	BLM is committed to maintain or increase protection of greater sage-grouse and their habitats. BLM will continue to work in cooperation with other wildlife and land management agencies and sage-grouse working groups to identify, maintain and restore sage-grouse populations and their habitats. In addition, a discussion of how BLM would work adaptively with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan, has been added to the Proposed RMP/Final EIS.
Special Status Species	The Nature Conservancy in Colorado	v. It is unclear when BLM will decide to require versus encourage BMPs. This offers operators little certainty.	See General Comment Response #41
Special Status Species	The Nature Conservancy in	vi. Certain BMPs need to provide more clear guidance (e.g., "Limit non-surface disturbing activities during the breeding season…")	See General Comment Response #41

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	Colorado		
Special Status Species	The Nature Conservancy in Colorado	i. Couple fragmentation limits with quantitative goals for functional blocks of sagebrush and/or sage-grouse habitat. Specifically, consider including a goal such as, “At all times maintain at least 8 blocks of functional sagebrush of at least 30,000 acres each, including at least 2 blocks of at least 80,000 each.” “Functional” would then need to be clearly defined. In other words, infrastructure must be such that sage-grouse populations remain stable or increase in size. Refine these numbers based on the identified areas of relatively unfragmented sage and perhaps areas that would cover 30-50 percent of the grouse critical habitat as identified on Map 2-4. Such a goal would ensure that sage-grouse always have a number of functional and undisturbed refuges while providing BLM and operators the flexibility to access oil and gas resources.	The size of a functional block of sagebrush can vary depending on many factors. Defining a size that would cover all conditions throughout the planning area is not feasible.
Special Status Species	The Nature Conservancy in Colorado	ii. To help ensure the maintenance of large functional blocks of sagebrush, switch the unit of analysis for fragmentation from unit or lease to entire grouse population units as defined by the Colorado Division of Wildlife (CDOW). A given percentage of any unit, lease, or other area will result in the same amount of development or disturbance throughout sagebrush. However, the pattern of development or disturbance may differ depending on the unit of analysis. Analysis based on a biologically relevant unit can promote larger undisturbed blocks of habitat while still allowing for the same amount of oil and gas to be extracted.	See General Comment Response #31
Special Status Species	The Nature Conservancy in Colorado	iii. Provide a scientifically-justifiable NSO around active leks. The plan should either (a) provide scientific justification for the 0.25-mile buffer currently part of the preferred alternative or (b) in the absence of scientific justification for 0.25 miles, provide a larger buffer based on best available science. BLM could provide a large buffer initially and allow that buffer to be reduced over time through adaptive management, should sage-grouse populations prove stable in the planning area.	BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS.
Special Status Species	The Nature Conservancy in Colorado	iv. Apply timing limitations throughout grouse habitat. BLM could grant waivers on a case-by-case basis if sage-grouse objectives could be better achieved through other means, such as conservation of large habitat blocks.	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. Within the Little Snake RMPPA, a number of conservation strategies are being implemented that benefit the greater sage-grouse. BLM will utilize these requirements, including the timing limitations, as the best available scientific supported management to protect sage-grouse, until

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			such time as the strategies change. Current timing limitations include: March 1 to June 30 there will be controlled surface use (CSU) for oil and gas exploration in greater sage-grouse nesting and early brood-rearing habitat, and development and avoidance areas for other surface disturbing activities within a 4-mile radius of the perimeter of a lek; December 16 to March 15, crucial sage-grouse winter habitat would be closed; and BMPs recommend/encourage the limiting of non-surface disturbing activities near active sage-grouse leks to portions of the day after 9:00 a.m. and before 4:00 p.m. during the breeding season, March 1–May 1.
Special Status Species	The Nature Conservancy in Colorado	v. Allow for additional leasing and lease renewal in sagebrush in an orderly, phased approach only after monitoring demonstrates that sage-grouse populations are meeting minimum population goals and are stable within the Little Snake planning area. Population goals should come from the local working group plan and CDOW.	Mitigative measures in Alternative C (Proposed RMP) have been developed in consultation with USFWS and the CDOW. If it is determined in the future that these measures are ineffective, BLM would amend the RMP to incorporate new information and revise the mitigative measures. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the Proposed RMP/Final EIS. In addition, a discussion of how BLM would work adaptively with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan, has been added to the Proposed RMP/Final EIS.
Special Status Species	The Nature Conservancy in Colorado	vi. Explain when and how BLM will decide when to require versus encourage BMPs.	See General Comment Response #41
Special Status Species	The Nature Conservancy in Colorado	vii. Define "non-surface disturbing activities" and "near active sage-grouse leks" in the following BMP, "Limit non-surface disturbing activities during the breeding season, March 1-May 1, near active sage-grouse leks…."	See General Comment Response #41
Special Status Species	The Nature Conservancy in Colorado	viii. One BMP states, "Reduce noise impacts from compressor stations by locating stations at least 2,500 feet away from leks…" Please provide scientific justification for the 2,500 ft. buffer. Adjust this buffer if necessary based on based on best available science (e.g., CDOW recommendations).	BLM has reviewed the best available scientific research pertaining to energy development and its impact on sage-grouse. The best available research supports the restrictions found in the Proposed RMP. BLM, in partnership with CDOW, has prepared

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			habitat management for sagebrush functionality, updated in the Proposed RMP/Final EIS and revised the surface reclamation performance standards.
Special Status Species	The Nature Conservancy in Colorado	b. Limitations of current provisions for white-tailed prairie dogs and associated species. i. Because the fragmentation limits apply only to sage-grouse and prairie dogs are much more likely to inhabit other community types, there are virtually no effective limits to fragmentation of communities that support prairie dogs. It does not appear that the plan will provide large and functional blocks of habitat – including reserves - to maintain viable populations of prairie dogs and associated species. According to the U.S. Fish & Wildlife Service (1989), a functional white-tailed prairie dogs complex needs at least 5,000 acres in order to support associated species such as black-footed ferrets (USFWS 1989). It is important to provide for refuges for prairie dogs, as populations can fluctuate by more than 50% from year to year (Seglund et al. 2004). In addition, the populations in the Little Snake planning area had a major die-off in 1994 and the populations were still “severely depressed” as of 2003 for unknown reasons (Seglund et al. 2004).	The Draft RMP/EIS analyzed protecting large blocks of prairie dog habitat through the White-Tailed Prairie Dog ACEC under Alternative D. The analysis concluded that special management attention was not required to prevent irreparable damage to white-tailed prairie dog habitat. Additionally, the Draft RMP/EIS includes management prescriptions to protect special status species, such as the black-footed ferret, mountain plover, and ferruginous hawk that are commonly associated with white-tailed prairie dog towns. The Draft RMP/EIS also states that “surface disturbing activities will be minimized to the extent reasonable to reduce landscape disturbance to prairie dog habitat for the black-footed ferret.” Finally, the new CSU/timing limitation stipulation in Alternative C (Proposed RMP) applying to prairie dog towns would also aid in the protection and recovery of white-tailed prairie dogs.
Special Status Species	The Nature Conservancy in Colorado	c. Recommendations for white-tailed prairie dogs and associated species including black-footed ferret. i. Create desired outcomes for prairie dog complexes that will be resistant and resilient to plague events. Set quantitative goals for functional blocks of prairie dog habitat that could also support black-footed ferret and other associated species. Specifically, consider including a goal such as, “At all times maintain at least X functional blocks of prairie dog habitat of at least X acres each, centered on potential restoration areas for black-footed ferrets.” “Functional” would need to be clearly defined.	The Draft RMP/EIS contains goals and objectives to “promote conservation and minimize the take of migratory birds” (page 2-16). Actions taken to implement these objectives would be determined at the activity level. The items for consideration provided by the commenter are more detailed than what is required for a landscape level RMP.
Special Status Species	The Nature Conservancy in Colorado	b. Limitations of current provisions for rare plants and plant communities. i. It is good that the RMP includes the flexibility for BLM to halt disruptive activities until protective measures could be implemented. However, this approach is not proactive in conserving the rare plants and plant communities that are known to exist. A more proactive approach would be to identify known and important concentrations of rare plants and plant communities now, and include provisions in the RMP to protect them up front. ii. Special designations in the preferred alternative do not fully cover	See General Comment Response #6

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		key concentrations of known rare plant populations and plant communities as identified by CNHP. Such areas, called Potential Conservation Areas (PCAs), are CNHP biologists' best estimate of the primary area required to support the long-term survival of species or communities of interest or concern.	
Special Status Species	The Nature Conservancy in Colorado	c. Recommendations for rare plants and plant communities. i. Ensure that PCAs are conserved through their inclusion in special designations and/or other measures (e.g., no surface occupancy within a certain buffer). Consider working with CNHP to establish specific goals.	See General Comment Response #6
Special Status Species	The Nature Conservancy in Colorado	Recommendations for rare plants and plant communities. ii. Of particular importance - provide special management for the PCAs that CNHP identified for Gibben's Beardtongue (Penstemon gibbensii). The BLM-managed lands in the Little Snake planning area contain the only known occurrences of this globally-imperiled species. CNHP has identified two PCAs for this species: Spitzie Draw (ranked B1 – outstanding biodiversity significance) and Sterling Place (ranked B2 – very high biodiversity significance). Spitzie Draw holds the only A-ranked (excellent-ranked) occurrence. Sterling Place holds the only B-ranked (good) occurrence.	See General Comment Response #6
Special Status Species	The Nature Conservancy in Colorado	Recommendations for rare plants and plant communities. iii. Include provisions in the RMP to ensure that rare plants (special status species and other globally imperiled plants as identified by CNHP) not included in PCAs will be adequately protected through pre-defined buffers, inventory requirements in stipulations, and other BMPs. Work with CNHP and/or the Rare Plant Task Force to define necessary buffers and BMPs.	See General Comment Response #6
Special Status Species	The Nature Conservancy in Colorado	The Conservancy has developed a planning support tool that the Little Snake Planning Area could use to strengthen the RMP's adaptive management provisions. This tool leads participants to systematically evaluate priority species and communities within a planning area; describe their health using indicators; identify impacts to priority species and communities; and develop desired outcomes and management actions to improve priority species and community health. BLM could use this tool to enhance the utility of land health standards for adaptive management. BLM has partnered with TNC in a variety of locales to use this tool to inform RMP revisions. In Colorado for example, TNC has facilitated the use and application of the tool with the San Juan Planning Area (completed in 2006) and the Glenwood/Kremmling Planning Areas	BLM realizes the value this tool could provide developing a system-level adaptive management framework. This framework will be outlined in the Assessment Guidance Document subsequent to the ROD.

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		(in progress). The latter effort is part of a national BLM initiative called the "BLM Learning Network." The Learning Network was created through a grant from the NFWF to the BLM WO to develop a training module for planning for biological resources. The project evolved from a five year Assistance Agreement between the BLM and The Nature Conservancy to develop planning tools for RMP use.	
Special Status Species	The Nature Conservancy in Colorado	(p.3-40-41). We would encourage BLM to generate a list for the AMS or the RMP that (a) shows the relationship between communities and species; and (b) clearly identifies the species that need special management attention – the species whose needs will not be adequately met through management of the broader community(ies) of which they are part. The "Fish and Wildlife Species of Primary Interest" table (p.3-40) is a good source of information for this list. Chances are, not every species in this table will need to be considered a priority species. In addition, Table 3-1 of the AMS describes landscapes that do not meet land health standards. The information that was use to create this table could also be used by BLM to develop a list of priority communities needing management attention.	Current conditions of special status species are discussed in chapter 3, pages 3-55 – 3-70. All special status plant and animal species within the RMPPA are listed in this section.
Special Status Species	The Nature Conservancy in Colorado	Key Steps of the Planning Support Tool: 2. Describe the "health" of priority species and communities. Adaptive management requires an understanding of the current health (i.e., functionality) of priority species and communities, as well as desired health (desired future condition). BLM communicates this information during the planning process through the AMS and/or the RMP. It can be a challenge to communicate information about resource health in a consistent manner across resources. As Appendix M states, "Standards…are somewhat subjective and could be assessed differently by different BLM interdisciplinary teams. This raises issues related to measurability, repeatability, and consistency" (p.M-4).	The current conditions of all special status species within the RMPPA are discussed in chapter 3, pages 3-55 – 3-70.
Special Status Species	The Nature Conservancy in Colorado	The activities below offer BLM a systematic and transparent process for evaluating and communicating information about resource health, based on land health standards or other resource goals: a. Identify key ecological attributes for each priority species and community. A "key ecological characteristic" is a critical component of an ecosystem or species (e.g., ecological processes such as fire regimes, species life history, community composition or interactions, habitat characteristics, or interaction with other species). Example: Key ecological attributes for sagebrush shrublands could include	The current conditions of all special status species within the RMPPA are discussed in chapter 3 of the Draft RMP/EIS. BLM realizes the value this process described by the commenter could provide in developing a system-level adaptive management framework. This framework will be outlined in the Assessment Guidance Document subsequent to the ROD.

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		presence and abundance of characteristic species (e.g., sage-grouse), presence of soil crusts, and/or species composition/dominance, etc. b. Identify indicators of each key ecological attribute. An "indicator" is a measurable entity that is used to evaluate the status and trend of key ecological attributes. BLM can integrate indicators land health standards and other already-established indicators into this activity. Example: Sage-grouse population size is an indicator of "presence and abundance of characteristic species" (key ecological attribute). This indicator would conform with one of the indicators of land health for Standard 4 (SSS) – "There are stable and increasing populations of endemic and protected species in suitable habitat." c. Identify and define a series of ratings for each indicator. This step would help BLM enhance the measurability, repeatability, and consistency of its assessment efforts. A sample series of ratings is poor, fair, good, and very good. Creating definitions for each rating would allow BLM to clearly show how current and desired condition (see next activity) compare with a possible range of conditions. These definitions should be as specific and quantitative as possible. They should also take into account the acceptable range of variability. Example: For the indicator "sage-grouse population size," definitions might include: Poor=Fewer than 100 birds as indicated by the number of males counted on leks; Fair= 100-200 birds; Good=201-300 birds; Very good = more than 300 birds. d. Pick current and desired future condition ratings for each indicator based on rating definitions. These condition ratings clearly show where a given indicator is now versus where BLM hopes it will be in the future. The desired future condition may vary by RMP alternative. Example: Current condition for sage-grouse population = fair; desired future condition = good.	
Special Status Species	The Nature Conservancy in Colorado	Observations and Recommendations for Little Snake. The AMS includes the majority of the plan's information about the current status of biological resources. For example, BLM describes current conditions and characterization for water resources (Ch. 3.1.4), vegetation (Ch. 3.1.5), fish and wildlife habitat (Ch. 3.1.6), special status species (Ch. 3.1.7), and other resources. The characterization sections for each chapter list indicators, which is very useful. For example, the special status species chapter states, "Primary indicators for special status species are their population numbers, population viability, and habitat stability" (p.3-64). The standards for public land health also provide a set of indicators. While these indicators are a significant step towards	The affected environment is adequately described in the Draft RMP/EIS and fulfills the intent of 40 CFR Sec. 1502.15, which states that, "The descriptions shall be no longer than is necessary to understand the effects of the alternatives." More detailed descriptions of the affected environment may be developed for site specific projects. Landscape Health Assessments are "an assessment of the health of biological resources." Land Health Standard requires that actions approved by BLM would allow special status species and their habitats to be maintained or enhanced by sustaining healthy

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		adaptive management, the set described in Chapter 3 of the RMP inadequately address the full suite of key attributes and indicators of priority communities and species and resource management conditions detailed in the RMP.	native plant and animal communities. BLM is also required to ensure that all wildlife and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities. The results of Landscape Health Assessments within the RMPPA are provided in chapter 3 of the Draft RMP/EIS.
Special Status Species	The Nature Conservancy in Colorado	We did not notice an assessment of the health of biological resources that clearly ties to the indicators of land health or the indicators that BLM identified in the AMS. If such an assessment does not already exist, we would strongly urge BLM to identify and define a series of ratings for each indicator and pick current and desired future condition ratings for each indicator based on the ratings. Once this information is developed, BLM will have a more clear baseline of the status of biological resources and will, over time, be able to systematically identify trends in health, progress toward meeting desired outcomes, and opportunities for adaptive management.	Appendix M states that an Assessment Guidance Document would be developed that contains system-level indicators, as well as desired outcomes, trigger points, and monitoring protocols. The affected environment is adequately described in the Draft RMP/EIS and fulfills the intent of 40 CFR Sec. 1502.15, which states that, “The descriptions shall be no longer than is necessary to understand the effects of the alternatives.” More detailed descriptions of the affected environment may be developed for site-specific projects. Landscape Health Assessments are an assessment of the health of biological resources.” The Colorado Public Land Health Standards requires that actions approved by BLM would allow special status species and their habitats to be maintained or enhanced by sustaining healthy native plant and animal communities. BLM is also required to ensure that all wildlife and their habitats are maintained or enhanced by sustaining healthy native plant and animal communities. The results of Landscape Health Assessments within the RMPPA are provided in chapter 3 of the Draft RMP/EIS. In addition, BLM has consulted with the USFWS and prepared a Biological Assessment of the Proposed RMP for Threatened and Endangered species that occur in habitat within and adjacent to the planning area.
Special Status Species	The Nature Conservancy in Colorado	Key Steps of the Planning Support Tool: 3. Identify factors impacting the health of priority species and communities. Impacts to priority species and communities, combined with information about their health, provide the basis for desired outcomes (goals and objectives) and management actions (see next step). Observations and Recommendations for Little Snake. The characterization sections of the AMS appear to include the most information about impacts to biological resources. For example, the	The current conditions of all special status species within the RMPPA are discussed in chapter 3, pages 3-55 – 3-70.

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		characterization section for special status species states, “In addition to continued threats from habitat loss and fragmentation, variability in habitat condition is an ongoing factor in the distribution and density of these special status species” (p.3-64).	
Special Status Species	The Nature Conservancy in Colorado	It is very helpful that the AMS identifies impacts. We would suggest that BLM more systematically evaluate impacts by completing this step. This evaluation would highlight the relative significance of impacts for individual priority species and communities, as well as across the entire planning area. In other words, this step can help assess cumulative impacts.	The current conditions of all special status species within the RMPPA are discussed in chapter 3. Impact analysis, including cumulative impacts, is discussed in chapter 4 of the Proposed RMP/Final EIS.
Special Status Species	The Nature Conservancy in Colorado	Key Steps of the Planning Support Tool: 4. Develop desired outcomes and management actions to improve priority species and community health. This step will help ensure that BLM will achieve its land health standards or other resource goals. The Conservancy collectively terms desired outcomes and management actions as “management strategies.” These strategies are informed by the health and impacts information developed in previous steps. The strategies should fully address (a) key impacts and (b) restoration needs of key ecological attributes of priority species and communities that have departed from desired condition. They should be quantitative to allow measurement of progress toward them. The health tables can be particularly useful in developing objectives – BLM could convert desired conditions from the health analysis into objective statements. Example: Goal=Achieve proper functioning condition in existing riparian systems that do not met land health and water quality standards. Objective=By the year 2020, ensure that all riparian areas meet PFC through restoration and removal or reduction of impacts. Management action=Control tamarisk along the Yampa River to meet PFC.	BLM realizes the value this tool could provide developing a system-level adaptive management framework. This framework will be outlined in the Assessment Guidance Document subsequent to the ROD.
Special Status Species	The Nature Conservancy in Colorado	In addition, the second paragraph of this appendix E states, “Exceptions to big game winter range and sage-grouse nesting and critical winter range timing limitation stipulations would be granted if operators meet the criteria to limit sagebrush habitat fragmentation described in Chapter 2.” Please change “would” to “could.” “Would” implies that BLM will automatically grant a waiver, exception, or modification should an operator limit fragmentation as described in Chapter 2. However, BLM should still preserve the option to not grant exceptions – for example, if the sage-grouse population plummets in the future, BLM may need to implement all possible best management practices – including timing limitations in	As part of the stipulation for an operator to obtain an exception to big game winter range and sage-grouse nesting and critical winter range timing limitation, they would be required to accept and implement established BMPs. These BMPs have been identified as sufficient measures to protect big game species and their habitats and important sage-grouse habitat/periods. If such BMPs are not effective and sage-grouse populations decline within the area receiving an exception, then modifications to BMPs or

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		combination with reducing fragmentation.	implementation of new BMPs would be considered. As new BMPs are developed, they may be added to this list of BMPs or may replace some of the existing ones.
Special Status Species	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.6.2 Management Actions - Colorado BLM Sensitive Species (p.2-23): Alt. C. We fully support that BLM would survey for Colorado BLM Sensitive Species (plants and wildlife) and rare plant communities. We recommend defining "rare" plant communities as "globally imperiled" (G1, G2, and G3 –ranked species as defined by the Colorado Natural Heritage Program).	BLM would prefer not to rely on the CNHP list because it may not always contain all BLM Sensitive Species. BLM will continue to use the BLM Sensitive Species list as a definition of "rare."
Special Status Species	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.6.2 Management Actions - Colorado BLM Sensitive Species (p.2-23): We also strongly urge BLM to expand this list to include BLM Special Status Species as a whole (not just Colorado BLM Sensitive Species) and globally imperiled plants (not just plant communities). Expanding the list will provide protective measures for more species, which will in turn reduce the likelihood that they will need to be listed in the future under the Endangered Species Act or on the BLM SSS list.	The sensitive species list includes all relevant species. Section 2.5.6 defines special status species as "… those plant and wildlife species that are federally listed as threatened or endangered, or that are proposed for listing, or that are candidates for listing under the Endangered Species Act (ESA) of 1973 as amended. Special status species also include those species designated by each BLM State Director as sensitive, as well as those species designated by a state agency in a category implying potential endangerment or extinction." As for including all BLM special status species, this is not necessary. Some species may be secure in one state while sensitive in another. This may simply be due to the fact that the state may be at the species' northern/southern/western/eastern most part of its range, which could account for its rarity. Also, habitat may be sparser in one state over another and thus account for a species' sensitivity. The list of sensitive species also includes plant species (see Table 3-14, pg 3-56).
Special Status Species	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.6.2 Management Actions – Columbian sharp-tailed grouse (p.2-24): Alt. C (same as Alt A plus extra provisions) states, "NSO would be allowed within a 0.25 mile radius of a lek site." We encourage BLM to justify this NSO based on scientific study. In the absence of such research, change a much larger buffer and allow a reduction of the buffer if monitoring demonstrates that goals for the grouse are still being met. This is a more cautionary approach.	BLM has revised the surface reclamation performance standards and has added additional management for sagebrush habitat in chapter 2 of the Proposed RMP/Final EIS. BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. BLM feels there is sufficient evidence to warrant the restrictions found in Alternative C.

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Special Status Species	The Nature Conservancy in Colorado	Appendix J – Special Status Species Conservation Measures & Recommendations, Special Status Species Conservation Measures (p.J-1): The first paragraph states, "The goal of these measures is to provide common expectations regarding how to reduce or minimize adverse effects to endangered, threatened, and proposed species resulting from BLM actions." This description is inconsistent with the definition of BLM Special Status Species (SSS) as we understand it, as BLM SSS also include candidate species, state-listed species, and sensitive species. Please change the goal to reflect the correct comprehensive definition of SSS, or change the title of the appendix to reflect the species on which this appendix really focuses.	The Proposed RMP/Final EIS has been revised to include a reference to all types of species that are considered special status species.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): We strongly urge BLM to change the vast majority of the "shoulds" to "shalls" throughout the conservation measures section. This is important if the conservation measures are truly going to "reduce or minimize adverse effects" (1st para) and "provide common expectations" (2nd para). Specific recommendations for changing "should" to "shall" include: Mexican spotted owl. • 1st bullet – "NSO shall be applied to all protected activity centers (PACs) • 3rd bullet – "…trees greater than 9 inches…shall be removed" • 4th bullet – "Livestock grazing in protected and restricted MSO habitats shall meet BLM Colorado's Standards for adequate levels of plant cover and forage for owl prey species." Yellow-billed cuckoo • 2nd bullet – "Construction of roads, pipelines, and powerlines through riparian habitat shall be placed near the edge of the current YBC habitat. This construction shall not occur from June 1 through August 1…." Cutthroat trout • 6th bullet – "Timber management, road construction…shall be analyzed and mitigated before project implementation." Federally listed and candidate plants • 1st bullet – "Surface disturbing activities or land exchange in occupied or suitable habitat locations shall be preceded by a current year survey and separate Section 7 consultation. • 2nd bullet – "All BLM-issued minerals leases shall include	The mitigative measures listed in Appendix J are only recommendations aimed at streamlining Section 7 consultation processes with the USFWS. It is important to be flexible given specific situations, which would open up the possibility to develop additional, often more effective mitigation measures. If a project proponent can develop a better method to protect the given species, BLM would entertain approving the method. In the case of Threatened and Endangered species, BLM would also consult with the USFWS on the new mitigation before allowing the project to proceed.

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		notification of all federally listed and candidate plant species…” • 3rd bullet – “BLM shall stipulate and implement fugitive dust control methods…” • 5th bullet – “Travel management plans shall include management direction to avoid adverse impacts…” Boreal toad • “BLM shall follow the management recommendations of the ‘Boreal Toad Conservation Plan and Agreement.’” • 9th bullet – “Campsites within 300 feet of occupied breeding habitat shall be closed seasonally…” • 10th bullet – “In suitable-unoccupied habitat, campsites shall be located at least 100 feet from riparian areas.” • 11th bullet – “New trails shall be at least 100 feet from boreal toad breeding sites.” Bald eagle winter measures • 1st bullet – “Human activities…shall be restricted from November 15 to March 15.” • 6th bullet – “All surface disturbing activities...shall be prohibited within 1/4 mile of known roosts….” • 7th bullet – “New roads and bridges…shall be located at least ½ mile from critical night roosts.” • 8th bullet – “All new powerline construction shall comply with the Avian Power Line Interaction Committee’s publication….”	
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J1 and J-3): It is helpful that you cite some sources of measures, such as the 1995 recovery plan for the Mexican Spotted Owl. Please add sources for species for which they are not listed: Colorado River fishes and yellow-billed cuckoo.	The measures in Appendix J were developed in coordination with the U.S. Fish and Wildlife Service and CDOW. While some of the measures may be from existing documents, such as recovery plans, the Appendix J measures were not intended to be a reiteration of the recovery plans measures. As such, the source of each measure has not been included.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): Colorado River fishes. 1st bullet currently reads, “Pipelines shall not be constructed in known spawning sites or backwaters.” Please add “within X distance of” after “constructed.”	These conservation measures were developed in cooperation with USFWS. The USFWS did not feel specifying a distance was necessary. Specific distances would be determined during project-level consultation with USFWS.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): Mountain plover. States only that BLM has committed to using the Interagency Mountain Plover Project Screen. Please	Space limitations prevent BLM from reprinting all referenced documents in the RMP. The Mountain Plover Project Screen is available to the public from

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		reference this document, describe it, and list the conservation measures that will be applied on BLM-managed lands.	your local BLM office.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): Canada lynx. 1st sentence states, "Conservation measures…will be implemented, as necessary." Describe how BLM will determine when it is necessary to implement various measures. List the criteria that BLM use to determine when it is necessary to implement such measures.	BLM is conducting the Section 7 consultation process concurrent with the EIS, which will conclude prior to issuance of the ROD. The "as necessary" requirements that determine the need for implementation of the conservation measures outlined in the Canada Lynx Conservation and Assessment Strategy are identified within the Biological Assessment and will be addressed in the resulting Biological Opinion from the USFWS. Implementing various conservation measures in regards to managing lynx and their habitats would be determined during project specific NEPA analysis and consultation with the USFWS.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): Federally listed and candidate plants. 2nd bullet reads, "Where listed and candidate species are present, BLM may require lessee to avoid activities…." Change "may" to "will."	The mitigative measures listed in Appendix J are only recommendations aimed at streamlining Section 7 consultation processes with the USFWS. It is important to be flexible given specific situations, which would open up the possibility to develop additional, often more effective mitigation measures. If a project proponent can develop a better method to protect the given species, BLM would entertain approving the method. In the case of Threatened and Endangered species, BLM would also consult with the USFWS on the new mitigation before allowing the project to proceed.
Special Status Species	The Nature Conservancy in Colorado	Appendix J, Special Status Species Conservation Measures (p.J-1 to J-6): Boreal toad. 9th bullet reads, "Campsites within 300 feet of occupied breeding habitat should be closed seasonally…." Cite specific dates for seasonal closures.	The mitigative measures listed in Appendix J are only recommendations aimed at streamlining Section 7 consultation processes with the USFWS. It is important to be flexible given specific situations, which would open up the possibility to develop additional, often more effective mitigation measures. If a project proponent can develop a better method to protect the given species, BLM would entertain approving the method. In the case of Threatened and Endangered species, BLM would also consult with the USFWS on the new mitigation before allowing the project to proceed. Boreal toads breed in the springtime and breeding times can vary due to availability of water and temperature needs. Due to the variability of breeding times, specific dates would

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			not be the best means to manage the species. Closures would be flexible to accommodate the variables of the breeding season.
Special Status Species	The Nature Conservancy in Colorado	Appendix N – Plant and Animal Species List, Table N-1 – Plant and Animal Species List: It is helpful that this list is available. Consider adding the following columns to enhance its utility: • ESA status • BLM Special Status Species • NatureServe global rank (this will allow BLM and the public to see which species may be "the next in the queue" to become BLM special status species – globally rare species that are not yet BLM SSS.	These classifications change frequently and could be out of date by the time the RMP is completed. While this information is could be helpful, it is not required in a BLM EIS document and is therefore not included in this table. The information in Appendix N is adequate for a landscape-level document. Chapter 3, special status species section of the Proposed RMP/Final EIS contains information regarding threatened, endangered, candidate, and BLM special status species which occur within the planning area.
Special Status Species	The Nature Conservancy in Colorado	Appendix N – Plant and Animal Species List Section (page) Table N-1 – Plant and Animal Species List: Consider also adding columns that show the relative importance of the BLM lands to each species. For example, you could columns such as the following: • Number of occurrences on BLM in Little Snake • Number of occurrences in Little Snake, all ownerships • Number of occurrences on all BLM throughout the species' range • Number of occurrences in throughout the species' range, all ownerships TNC and/or the Colorado Natural Heritage Program could assist in pulling together this information if you are interested.	These classifications change frequently and could be out of date by the time the RMP is completed. This level of detail is more appropriate for a site-specific plan. BLM is mandated to manage habitat for wildlife species, the species themselves are managed by CDOW and USFWS. This level of information may be available through the state and federal wildlife management agencies.
Special Status Species	U.S. Fish and Wildlife Service	We would like to see more discussion on means to increase greater sage-grouse numbers throughout the LSFO boundaries. This would include habitat manipulation such as sage brush thinning and seeding with forbs, reduced livestock grazing, brush beating, protection of riparian areas and designation of ACECs that protect critical areas.	To ensure proper and effective management of the different life stages and requirements of sage-grouse, BLM is currently implementing, and will continue to implement, management strategies identified in the BLM National Sage-grouse Strategy, the 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan, and the 2007 Colorado Greater Sage-Grouse Conservation Plan. These plans were based on the best available scientific information. Habitat manipulations for the purpose of improving sagebrush habitat and other reasons are discussed in Section 2.5.4.2 of the Proposed RMP/Final EIS. Livestock grazing can be modified at the activity level without an RMP decision. BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation

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			performance standards of the Proposed RMP/Final EIS. In addition, a discussion of how BLM would work with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan has been added to the Proposed RMP/Final EIS. In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G. Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives.
Special Status Species	U.S. Fish and Wildlife Service	Pages 2-16/2-19 Improving and Maintaining Sagebrush Habitat Functionality by Limiting Fragmentation, Alternative C: We are concerned, based on new research from Hollaran (2005) and Naugle et al. (2006a, b), that the criteria described in the RMP may not be protective enough of greater sage-grouse within the LSFO boundaries. Primarily, we are still not convinced that the 5 percent disturbance factor will work, especially when there are numerous operators and a percentage of the area is already disturbed or planned to be disturbed. We also believe that the 5 percent disturbance factor may be too high. The Roan Plateau which will be overseen by one operator is proposing to allow a 3 percent disturbance factor. We are encouraged by the overall concept and the discussions behind the proposal to leave larger blocks of sagebrush habitat undisturbed by clustering facilities, and building roads and pipelines in a manner that minimizes disturbance within prime sagebrush, steppe habitat, we are just not convinced it will provide the long-term conservation the greater sage-grouse needs at this time. We would like to see a phased development where disturbance occurs in one area then the activity moves on to a new area instead of having widely distributed disturbance throughout the LSFO boundaries.	See General Comment Response #31
Special Status Species	U.S. Fish and Wildlife Service	Page 2-19 Raptors: Alternative C which doesn't exclude the ferruginous hawk needs to be clarified, or notice made to see	BLM changed the language in the Proposed RMP/Final EIS to clarify that special status raptor

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		Section 2.5.6.2, Ferruginous Hawk, because this section defines a different buffer area. Ferruginous hawks generally occupy open areas where disturbance within 1 mile could adversely impact the birds during nesting season. Providing a 1-mile buffer from February 1 to August 15 should reduce impacts to this Special Status Species.	species are not included in the wildlife section.
Special Status Species	U.S. Fish and Wildlife Service	Page 2-24 Greater Sage-grouse: Within this section we believe Alternative D provides additional needed protection that this species needs to decrease the likelihood that it trends towards becoming federally listed. Emerging science on greater sage-grouse has reached the level where action should be taken now to avoid further impacts. We currently know that oil and gas production, as it has been done in the past, has had major impacts on sage-grouse populations. Oil and gas production carried out the same way as in the past could lead to extirpation of populations inside the project area, based on studies conducted by Hollaran 2005 and Naugle et al. (2006a, b).	See General Comment Response #31
Special Status Species	U.S. Fish and Wildlife Service	Page 2-24: Habitat within the LSFO boundaries is critical for wildlife species dependent on sagebrush and grassland ecosystems. Mule deer, pronghorn, sage-grouse, and a variety of migratory birds are dependent on this mixed grassland and shrubland or "steppe" habitat that once characterized much of the interior west. The BLM has stewardship for approximately 50 percent of the remaining sagebrush habitats in the United States (Connelly et al., 2004).	BLM is required to manage habitat for threatened, endangered, and BLM special status species using the best available science while still managing public lands for multiple use. BLM, in partnership with CDOW, updated habitat management for sagebrush functionality in the Proposed RMP/Final EIS.
Special Status Species	U.S. Fish and Wildlife Service	Recent research in Wyoming and Montana has revealed significant negative effects of oil and gas development and production on sage-grouse populations. Between 1990 and 1995, prior to coal bed natural gas (CBNG) development in the Powder River Basin of Wyoming, male attendance at breeding leks (a standard index of sage-grouse populations) fell by over 80 percent (Naugle et al., 2006a). After CBNG development began, attendance at leks located within developed fields was 46 percent lower than attendance outside of developed fields. Within CBNG fields only 40 percent of leks remained active over the 4 year study while outside of CBNG fields 80 percent of leks remained active. In addition, leks located at the edge of development had the highest lek attendance, indicating that development was displacing birds into areas that were yet undeveloped. While displacement is often considered by the public to be preferable to mortality, at the population level it is detrimental to both the displaced population and the receiving population due to increases in density-dependent sources of mortality, decreases survival and reproduction, and potentially increases susceptibility	BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. The best available research supports the restrictions found in the Proposed RMP/Final EIS, Alternative C.

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		and transmission of disease. The effects measured in this study should be taken as a minimum effect of the development as time lags in sage-grouse reaction to landscape changes are considerable (Hollaran 2005). The duration of the study reported by Naugle et al. (2006a) may not have been long enough to detect the extent of the full effect of CBNG development. In fact, given the rapid decline reported by Naugle et al. (2006a, b) and Hollaran (2005) it is believed there is a high probability that sage-grouse will be entirely lost from the intensively developed areas they studied.	
Special Status Species	U.S. Fish and Wildlife Service	Another recent report by Naugle et al. (2006b) showed that wintering greater sage-grouse in the Powder River Basin avoided CBNG developed areas in otherwise suitable winter habitat. The data indicate that sage-grouse habitat selection occurs at a very large scale, on the order of "numerous square miles" of intact habitat rather than the smaller parcels of intact habitat usually left over after energy development. Naugle et at (2006b) concluded that risk of loss of the northern Powder River Basin population was high if plans to develop CBNG there proceeds. The work of Naugle et al. (2006a, b) and Hollaran (2005) are supported by additional studies from Wyoming (Lyon and Anderson 2003) and Alberta, Canada (Aldridge and Brigham 2003) each showing significant adverse effects of oil and gas development on greater sage-grouse, conversely, to our knowledge there are no examples of studies showing maintenance of healthy sage-grouse populations in the presence of dense (=greater than 1 well per section) oil and gas development and production.	BLM implements seasonal timing restrictions to protect wildlife species and associated habitat that is critical for the survival of these species. Winter is a critical period for most wildlife species, available food sources are low in contained energy needed to sustain life during cold periods when additional energy is required to maintain metabolic functions. The Proposed RMP contains a number of conservation strategies designed to benefit greater sage-grouse and their winter habitat. To reduce disturbance to the animals, greater sage-grouse winter habitat would be closed to surface disturbing and other disruptive activities from December 16 to March 15. In addition, one of the many goals of the Little Snake RMP is to maintain, improve, and restore (where needed) healthy ecosystems and habitat to support viable populations of native fish, plants, and wildlife species, while reducing habitat loss and fragmentation. Combining the closing of sage-grouse winter habitat December 16 to March 15 and BLM's efforts to reduce fragmentation and restore healthy ecosystems, adequate protective/conservation measures are in place to minimize impacts on sage-grouse on their winter habitat.
Special Status Species	U.S. Fish and Wildlife Service	We conclude that research findings to-date illuminate several working principles that should be applied when evaluating new oil and gas development proposals. • Full field oil and gas development in the past has been detrimental and likely incompatible with maintenance of sage-grouse populations; • The lack of any examples of densely spaced oil and gas developments where sage-grouse populations have been	BLM, in partnership with CDOW, USFWS, and Moffat County has prepared habitat management for sagebrush functionality, updated in the Proposed RMP/Final EIS. BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. Within the Little Snake RMPPA, a number of conservation strategies are being implemented that benefit the greater sage-

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		maintained means that the level of development that can be effectively withstood by sage-grouse populations are currently unknown. • Effects of oil and gas operations negatively affect sage-grouse in all seasons, making timing restrictions ineffective and necessitating mitigation measures that effectively address sage-grouse needs in all seasons. • Effects of oil and gas operations include effects of both construction and production phases of development necessitating mitigation measures that effectively address all phases of development, not just the construction phase as do the current lease stipulations. • The scale that sage-grouse perceive their habitat is very large, on the order of numerous square miles, and mitigation measures for proposals affecting large areas must take this scale into account. • Time lags that occur between the onset of oil and gas development and the population response by sage-grouse are on the order of 3 to 4 years, making adaptive management problematic if it is being applied in a rapid development scenario.	grouse. BLM will utilize these requirements, including the timing limitations, as the best available scientific supported management to protect sage-grouse, until such time as the strategies change.
Special Status Species	U.S. Fish and Wildlife Service	Past studies of range-wide and regional lek attendance trends (Connelly et al. 2004) indicate that sage-grouse population's cycle with peaks and valleys at approximately 5-10 year intervals. Declining populations show these same peaks and valleys except that each successive peak and valley is lower than the previous one, leading to a long term population decline. It is therefore necessary to look at long-term trends in sage-grouse populations to determine if a population is in decline. We suggest that when evaluating the effect of the 5 percent rule, you incorporate an appropriate long-term population trend measure, such as 5 or 10 year trend, as well as the year-to-year trend into your decision matrix. At a minimum, for the percent rule to be successful in maintaining sage-grouse in the LSFO area the following provisions must be required. • Continue to work closely with the Northwest Colorado Greater Sage-Grouse Working Group. • The monitoring protocol should be clearly defined and funding (or interagency agreements) to accomplish it should be in place at the time of the Record of Decision. Appendix F should be clarified and have timeframes and additional specifics as to how monitoring will be accomplished. Examples of issues that should be addressed include: how the health and security of sage-grouse populations will be monitored (what indicators will actually be used other than lek	BLM manages about half of all remaining greater sage-grouse habitat in the nation and the management of this habitat is an extremely critical tool in halting the decline of the greater sage-grouse in the Western United States. BLM developed the National Sage-Grouse Habitat Conservation Strategy. This conservation strategy provides national sage-grouse habitat conservation guidance in BLM land use plans. The Northwest Colorado Greater Sage-Grouse Conservation Plan (NWSG Plan) and the Colorado Greater Sage-Grouse Conservation Plan identify potential conservation actions that might be implemented in order to maintain and enhance greater sage-grouse populations and habitat. To achieve sage-grouse conservation objectives, BLM intends to cooperate with the Northwest Colorado Greater Sage-Grouse Working Group to conserve sage-grouse habitat by, for example, identifying, maintaining, and restoring sagebrush with an emphasis on creation of functional blocks of sagebrush as greater sage-grouse habitat. Due to the varied nature of sage-grouse reproductive performance, habitat capability, and conservation

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		counts); what will be used to monitor reproduction opportunities; and, what level of population change will be used to determine whether grouse population health is responding positively or negatively to authorized activities. • Identification of leks to be monitored both inside of crucial habitats and outside of crucial habitats (outside of oil and gas development) should be completed so that determinations can be made as to adequacy of sample sizes and appropriateness of reference (non-developed) areas. • Decision points (annual, semi-annual, etc.) must be identified where monitoring data will be applied to determine how future development will proceed. Otherwise, decisions could be delayed indefinitely, allowing development to proceed unchecked. • Clarification as to what mitigating circumstances would allow for development in the face of declining population trends, i.e. when is it appropriate to add increased disturbance from oil and gas development to a population that is already in decline. • If the pace of development at the 5 percent rate shows a decline in sage-grouse then a lower percentage must be considered. Unfortunately the trends in sage grouse populations are on a 5 to 10 year cycle and development may occur at a much faster rate making evaluating the overall impact of the 5 percent rule difficult to assess.	threats among the seven different management zones established by the NWSG Plan, each zone will be evaluated and managed independently with a goal toward reaching and maintaining its own internal population goal and the broader population goal. Conservation strategies applied in each zone will focus on meeting the desired condition for greater sage-grouse habitat and population performance on a sufficient portion of the zone to meet population goals. Conservation activities may proceed at different rates, and in different directions in each management zone based on the needs of the zone, its priority in meeting overall goals, and the availability of resources. During the development of the Proposed RMP, BLM worked with CDOW, USFWS, and Moffat County to include a discussion of how BLM would work adaptively with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan. This decision has been included in Alternative C of the Proposed RMP/Final EIS.
Special Status Species	U.S. Fish and Wildlife Service	Pages B-1 to14 Produced Water This appendix describes produced water associated with oil and gas development within the area. Overall the discussion states that most produced water within the basin would be of relatively good quality with only the Fort Union Formation having total dissolved solids that may be at concentrations of concern. In this area, water quality, especially as it relates to bicarbonate toxicity in fishes, may lead to adverse effects to fishes and other aquatic organisms where produced water is discharged to surface waters. We recommend that water quality monitoring efforts measure specific constituents, e.g. bicarbonate levels, as the composition of salts leading to elevated electrical conductivity (EC) or sodium absorption ration (SAR) readings may be important to fishes. Skaar (2005) found that fathead minnows (Pimephales promelas) were more sensitive to bicarbonate than white sucker (Catostonzus commel soni). Sodium bicarbonate concentrations in excess of 400 mg/L caused substantial mortality of newly hatched fathead minnows, whereas white suckers were not adversely affect until concentrations reached over 4,000 mg/L. The sensitivity of fathead minnows raises the	Individual NPDES permits dictate what type of monitoring will be required. BLM will take into consideration the inclusion of bicarbonate levels in water quality monitoring efforts.

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		possibility that other aquatic organisms may be similarly sensitive and conservative management thresholds and monitoring techniques should be used that will protect the most sensitive species.	
Special Status Species	U.S. Fish and Wildlife Service	Pages H-6 and 7 Surface Disturbance Associated With Exploratory Drilling In this appendix there is a discussion concerning reserve pits. Reserve pits have been known to present problems to migratory birds and small mammals. It is important that all pits that contain produced water be netted to exclude migratory birds and fenced with a small mammal barrier around the base. Somewhere in the DEIS we would suggest the following be included: The Migratory Bird Treaty Act (MBTA), 16 United States Code Sections 703 707, prohibits any "take" of migratory birds. The definition of take includes the killing, possessing, or collecting of migratory birds. Migratory birds are listed in the Code of Federal Regulations, Part 50, Section 10.13. All migratory birds killed as a result of contact with exposed oil, or other hazardous materials constitute violations of the MBTA. Operators should always ensure that no surface oil is present on pits, tanks, evaporation ponds, etc. Exposed oil or other hazardous material (even as the result of an oversight or equipment malfunction) places the company at risk of violating the MBTA should migratory bird mortalities occur. The maximum criminal penalty for corporations unlawfully taking a migratory bird is a $15,000 fine, and/or up to 6 months in jail, for each count.	The language provided by the commenter is more detailed than is required for a landscape level RMP. Reserve pits, and operator requirements for such, are addressed through the onshore orders and state and local regulations, as well as BLM BMPs. BLM and all lessees and operators must comply with the Migratory Bird Treaty Act. Activities will be conducted in a manner to ensure compliance with the law.
Special Status Species	U.S. Fish and Wildlife Service	To prevent violations of the MBTA companies should take proactive steps to ensure that migratory birds do not come in contact with oil, sheens or hazardous materials. Examples of effective steps proven to prevent bird mortality include the installation of physical barriers such as netting or using closed containers that prevent birds from coming into contact with the oil. The following options should be considered: • Use Closed Containment Systems - Closed containment systems require little or no maintenance and the system can be moved to a new site when the facility is closed. Closed containment systems eliminate soil contamination and remediation expense. • Eliminate Pits or Keep Oil off Open Pits or Ponds - The disposal facility should be designed to prevent oil from entering the evaporation pond. Additionally, a contingency plan should be developed for the facility to ensure immediate clean up of oil	The Draft RMP/EIS contains goals and objectives to “promote conservation and minimize the take of migratory birds” (page 2-16). Actions taken to implement these objectives would be determined at the activity level. The items for consideration provided by the commenter are more detailed than what is required for a landscape level RMP. BLM does not permit wastewater evaporation ponds or oil production skim pits. In addition, underground injection control permits for produced water are regulated by the State of Colorado. Other operator requirements are addressed through onshore orders and state and local regulations, as well as BLM BMPs.

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		discharged into the evaporation pond to prevent wildlife mortalities. • Use Effective and Proven Wildlife Deterrents or Exclusionary Devices -- If open-topped tanks or pits will be used to store oil at the facility, effective wildlife exclusionary devices should be installed to prevent wildlife mortality. Netting appears to be the most effective method of keeping birds from entering wastewater evaporation ponds and oil production skim pits. Flagging is not an effective deterrent. • Implement Engineering Controls to Prevent Oil Discharge to Pond -- Engineering controls should be designed and implemented to prevent the discharge of wastewater containing oil and surfactants into the evaporation pond. • Dispose of Oil Field Wastewater by Deep Well Injection - Deep well injection of oil field wastewater would eliminate the need for evaporation ponds and thus eliminate the risk to migratory birds and other wildlife from exposed oil, surfactants and hypersaline conditions which could result in mortality	
Special Status Species	U.S. Fish and Wildlife Service	Appendix J: The second sentence in the first paragraph under "SPECIAL STATUS SPECIES CONSERVATION RECOMMENDATIONS" is not clear and should be rephrased.	Appendix J has been modified in the Proposed RMP/Final EIS to clarify a change in direction regarding special status species conservation measures.
Special Status Species	U.S. Fish and Wildlife Service	Appendix J: On page J-3, we are not clear as to what BLM interprets the implications of the last sentence in the paragraph under "Canada lynx" to mean.	Appendix J has been modified in the Proposed RMP/Final EIS to clarify a change in direction regarding special status species conservation measures.
Special Status Species	U.S. Fish and Wildlife Service	Appendix J: Under the Bald Eagle section, reference is made to the "National Management Guidelines for the Bald Eagle" and that the interim measures have been developed in the meantime. Will BLM implement the interim conservation measures until the National Guidelines are finalized? Will the National Guidelines replace the interim guidelines upon finalization?	Yes, as implied on page J-5 of the Draft RMP/EIS Appendix J, the interim conservation measures would be implemented. Additionally, the Little Snake Field Office intends to adopt any final guidance regarding issues of project design for special status species, including finalization of the National Management Guidelines for the Bald Eagle.
Special Status Species	U.S. Fish and Wildlife Service	Appendix M: We strongly support the use of adaptive management and the increased levels of monitoring outlined in Appendix M for implementation of this plan. However, more specifics describing the sideboards (operating criteria) for key species such as black-footed ferrets and greater sage-grouse should be finalized prior to issuance of the Final EIS and Record of Decision. This would enable all affected parties to understand when additional management efforts would be required	BLM recognizes that an adaptive management approach is incomplete without measurable outcomes, indicators, and trigger points. However, including these details in a land use plan where they cannot be changed without an RMP amendment is contrary to the flexibility which an adaptive management approach is designed to provide. Therefore, BLM has committed to preparing a

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			subsequent adaptive management document entitled an Assessment Guidance Document. This document will contain all the necessary specific information required for adaptive management. BLM states in Appendix M that the Assessment Guidance Document will be developed within a 2-year period after the ROD is signed and that no adaptive management projects would be allowed before the approval of this document. In addition, a discussion of how BLM would work adaptively with other agencies and interested parties to achieve the goals and objectives, including CDOW's population targets, included in the Northwest Colorado Greater Sage-Grouse Conservation Plan, has been added to the Proposed RMP/Final EIS.
Special Status Species	Vermillion Ranch Limited Partnership	Pg 3-55 We challenge the special status i.e. grouse they are using Connelly on pg 61-63 and request that it be removed as fact.	The status of a wildlife species is not determined in land use plans. Species are designated as a BLM special status species by BLM's state director. Removing this status for sage-grouse is beyond the scope of this document. Information cited to Connelly in this section of the EIS is limited to his findings resulting from a literature review of sage-grouse data collected for the state of Colorado.
Special Status Species	Western Watersheds Project	Guidelines for Management of Sage Grouse Habitat These authors (Braun et al, Connelly et al, and Welch et al) have provided a variety of guidelines for management of sage grouse habitat. These include: • Sagebrush eradication should not be practiced. Treatments can be used to thin dense sagebrush stands to a range of sagebrush cover from 15% to 25%. Burns should be avoided in xeric Wyoming big sagebrush habitats). Only small burns to create mosaics in mountain big sagebrush should be contemplated and these are considered experimental. • Rehabilitation following wildfire or other disturbances should focus on reestablishing sagebrush and native herbaceous plants. Annual grass establishment following fire is detrimental. Grazing should not be allowed on seeded areas until plant recruitment has occurred. • Range seedings should focus on establishing forbs, native grasses and sagebrush. Monoculture seedings of crested wheatgrass and other non-natives are discouraged.	See General Comment Response #31

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		• Applying insecticides to summer habitat is not recommended. • Livestock use around water sources and wet meadows in brood rearing areas should be regulated through fencing or other management to restrict overuse. • Grazing practices should be adjusted to maintain residual grass growth essential for nest concealment and then delay grazing the same areas until after nesting. • Plot sage grouse use areas including leks, nesting areas, wintering sites, meadows and summer range or brooding areas on maps. • No sagebrush will be treated or removed until a comprehensive plan has been formulated for management of the area. • Sagebrush control projects will include provisions for long-term quantitative measurement of vegetation before and after to determine effects on habitat and whether objectives were met. • No sagebrush control projects will be done on areas where live cover is less than 20%, on steep slopes or upper slopes with skeletal soils where big sagebrush is less than 30 cm. • No sagebrush control along streams, meadows or intermittent drainages. A 100 meter strip of live sagebrush should be left on each edge of meadows and drainages. • When sagebrush control is found to be unavoidable, treatment measures should be applied in irregular patterns using topography and other ecological considerations. Widths of treated and untreated areas can vary except treated areas will not be wider than 30 meters and untreated areas will be at least as wide. • Manage breeding habitats to support 15 – 25% canopy cover of big sagebrush, perennial herbaceous cover >18 cm in height with > 15% canopy cover of grasses and > 10% canopy cover of forbs. • Most recently, Braun in his 2005 management recommendations for sage grouse addressed livestock grazing, utilization levels and management (Braun et al, 2005; Braun 2006). Partners in Flight (Paige and Ritter, 1999) provide management recommendations for sage grouse and migratory birds obligate to sagebrush-steppe. These include: • Identify and protect those habitats that still have a thriving community of native understory and sagebrush plants. • Maintain large, continuous blocks of unfragmented habitat • Maintain seeps, springs, wet meadows and riparian vegetation in a healthy state	

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		• Avoid practices that convert sagebrush to non-native grassland or farm land. • Maintain stands of sagebrush for a balance between shrub and perennial grass cover. • In large disturbed areas, sagebrush and perennial grasses may need to be reseeded to shorten recovery time. • To maintain bluebunch wheatgrass vigor, avoid grazing during the growing season until plants begin to cure. Bluebunch wheatgrass is especially sensitive to heavy grazing during the growing season. Recovery of these plants following heavy grazing during a single spring can require 8 years under the best management and environmental conditions. • Grazing plans will depend on the current condition and plant composition of the area. Defer grazing until after crucial growth periods. Note that in the presence of cheatgrass, deferred grazing can favor the cheatgrass. • For sage grouse maintain average grass height of at least 18 cm in May and early June. Sharp-tailed grouse require 20 cm. • Consider livestock exclusion from heavily damaged areas, particularly wet sites. • Livestock concentrations around water developments can increase cowbird parasitism. • Use fences with smooth top and bottom wires for exclosures around wet sites. Miller and Eddleman (2000) also provide an excellent review of sage grouse ecology, habitat and management. They emphasize that sage grouse habitat management plans must take into account landscape heterogeneity, site potential, site condition and habitat needs of sage grouse during different parts of their life cycle (breeding, nesting, brood rearing, wintering). They also stress the importance of accurate resource inventories and assessments before making management decisions as to when and how each community across the landscape should be managed. Grazing management plans must identify potential conflicts between sage grouse and livestock.	
Special Status Species	Wilderness Society (The), et. al.	Voluntary surface disturbance limitation for sage grouse habitat will not reliably protect sage grouse habitat and will further impact crucial winter habitat for big game. The Draft RMP also presents another management approach for oil and gas operators to agree not to disturb more than 5% of a lease or	The decisions placing ceilings on surface disturbance were revised in the Proposed RMP/Final EIS after review of public comments and extensive coordination with CDOW specialists. The sagebrush management actions contained in the Proposed

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		unit of leases surface at once in areas within 4 miles of sage grouse leks and 8 identified sagebrush patches. Draft RMP, pp. 2-16 – 2-19. This is a voluntary arrangement, under which operators agree to limit surface disturbance and, in exchange, their oil and gas development activities are exempted from all timing limitations and also the winter range limitation for big game, so that they can drill year round. The BLM's stated intent is not to have facilities more than every 160 acres, so even though the 5% is not a spacing requirement, "operators are encouraged to develop proposals that leave larger blocks of sagebrush habitat undisturbed within project areas, by clustering facilities, carefully designing road and pipeline systems to minimize disturbance, or other means." Draft RMP, p. 2-17. However, because there is no actual spacing requirement and there are no other standards for road density, core areas or other measures to preserve functioning habitat, the BLM cannot reasonably rely upon this approach to be successful. The Draft RMP also does not provide sufficient scientific data as to why the 5% surface disturbance would actually protect functional sage grouse habitat. In fact, Clait Braun, a leading scientist studying sage grouse, comments that the "idea is novel but it has no known scientific basis or merit for sage-grouse." Rather than mitigating impacts to sage grouse, Clait Braun concludes that this approach would "ensure that local populations would be at threat of extirpation." In addition, Clait Braun questions the accuracy of the baseline data on sage grouse populations and the selection of areas to be included. A Blueprint for Sage-grouse Conservation and Recovery (attached and incorporated by reference into these comments) details the habitat requirements for successful and sustaining sage grouse populations, and includes specific recommendations for managing oil and gas development. Based on this document and his knowledge of the Little Snake planning area, Clait Braun concludes that the 5% limitation on surface disturbance will not provide the core areas and linkages between those areas necessary for sage grouse to survive, unless a stronger definition of these large habitat patches to ensure that they are actually functional is used and linkages are also identified and protected. Further, he recommends protection of sage-grouse winter use areas altogether.	RMP/Final EIS are designed to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary, incentive based) leases. It is also important to note that the ceiling on disturbance is not the only stipulation associated with development in these areas. The stipulation also states that BLM would require PODs from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Map 2-3 illustrates the extent of this habitat protection approach, which covers the majority of the planning area. This requirement, while not specifically noting a required route density, would require that fragmentation from road development be limited. The actual methodologies and strategies for road placement would be identified during implementation when topography and other site-specific issues would also be able to be considered. A surface spacing limitation could result in small pockets of development scattered across the landscape every 160 acres (or other spacing), each with a road connecting them, leaving few large areas undisturbed. However, limiting development to a percentage of the lease, coupled with the required POD, could result in pockets of more intense development, thereby leaving larger blocks of habitat completely unfragmented. Other stipulations would also apply, such as NSO requirements for sage-grouse leks, regardless of the waiver of the seasonal stipulation. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation. The commenter does not provide any evidence beyond their own claim that local populations of sage grouse would be at threat of extirpation. The Draft RMP/EIS does include impacts to sage grouse from oil and gas development, including the 1% and 5% surface disturbance limitations. However, BLM does not concur that sage grouse populations within the Little Snake Field Office would be extirpated.

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			BLM has revised chapter 2 and the sagebrush habitat map to identify high and medium priority habitats based on coordination between CDOW and BLM wildlife biologists. The commenter did not provide any more accurate baseline data to be used in the Proposed RMP/Final EIS. BLM has used the best available data for developing management actions and determining impacts. To ensure proper and effective management of the different life stages and requirements of sage-grouse, BLM is currently implementing, and will continue to implement, best management practices identified in both the 2008 Northwest Colorado Greater Sage-Grouse Conservation Plan, and the 2007 Colorado Greater Sage-Grouse Conservation Plan. These plans were based on the best available scientific information, were developed by a wide range of sage-grouse experts across a variety of agencies, and were published after the commenter's recommended document.
Special Status Species	Wilderness Society (The), et. al.	Examples of species specific information on fragmentation and impacts from roads and oil and gas development from field biologists and the scientific literature that should be considered include the following: Greater Sage-Grouse Impacts: Greater Sage-Grouse suffer from dwindling habitat across the west due to deterioration, fragmentation and direct loss of habitat (Connelly and Braun 1997, Braun 1998 (attached), Connelly et al. 2000 (attached), Schroeder et al. 2004). Findings cited in the Draft RMP from Colorado Department of Wildlife biologist are valuable and should be given stronger consideration. "It has been found that no more than 75 percent of Greater Sage-Grouse nests are found within a 4-mile radius of a lek, making the previous production area size insufficient to protect most nests." (Draft RMP, p. 3-64). The number of well pads within a given radius of a lek is also used to evaluate indirect effects on Sage-Grouse. Holloran (2005) looked at wells within a 2-mile (3km) radius of leks in Wyoming and found that 5 to 15 wells caused relatively light effects. Leks with greater than 15 wells within a 2-mile radius were heavily affected. Holloran (2005) also found that in highly disturbed areas the annual survival of adult nesting females declined 20.4 percent and the annual survival of nesting yearling females declined 6.4 percent. Lyon and Anderson (2003) found that female nest initiation rates	The conclusions raised by the studies the commenter quotes are included in the analyses contained in chapter 4 of the Draft RMP/EIS, as are several of the specific references the commenter uses. The effects identified by the studies are addressed in the analyses, namely that increasing habitat fragmentation from oil and gas development could lead to decreases in sage-grouse populations, displacement of individuals, fewer breeding males at leks, and lower brood survival rates. Repeating the specific aspects of these studies provided by the commenter does not provide any further evidence beyond the conclusions drawn from those same studies and presented in chapter 4 of the Draft RMP/EIS. The section detailing impacts to greater sage-grouse in chapter 4 of the Proposed RMP/Final EIS was updated, including referencing additional studies.

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		declined 24% in disturbed areas. Preliminary results of an ongoing study of Sage-Grouse in Montana coal-bed natural gas (CBNG) development showed an active lek had one third the density of wells within two miles of the lek compared with an inactive lek, and that “active leks and leks with moderate to large numbers of males were often found adjacent to CBNG fields but rarely within CBNG” (Naugle et al. 2006).	
Special Status Species	Wilderness Society (The), et. al.	Black-footed ferrets. The BLM has been relying on the restriction that "no surface disturbing activities would be allowed that might significantly alter the prairie dog complex and make it unsuitable for reintroduction of the black-footed ferret" (Draft RMP, p. 2-26) to mitigate surface disturbance impacts on ferrets, but we have long argued that this is essentially meaningless. Since the 1995 plague event the complex has remained unsuitable for ferret reintroduction already, so it is totally unclear what would have to happen to make the complex even less suitable. "Significantly alter" is never defined or quantified, either. Alternative D proposes to retain this language, according to page 2-27, and the preferred alternative uses similarly vague language: "Surface disturbing activities will be minimized to the extent reasonable to reduce landscape disturbance to prairie dog habitat for the black-footed ferret" (Draft RMP, p. 2-27). What is reasonable? By how much should landscape disturbance be reduced? Recommendations: The RMP revision provides an opportunity for the BLM to chart a course involving the following steps: • Improved prairie dog and ferret management • Prairie dog recovery in the Little Snake Complex • Ferret reintroduction • Ferret recovery in the Little Snake Complex Without actively working toward these goals, they are unlikely to be achieved. Designating the White-tailed Prairie Dog ACEC and employing the management prescriptions in Alternative D along with those we have discussed above would go a long way toward making ferret reintroduction possible. But following the preferred alternative's course of further fragmenting large colonies will make recovery of either species much more challenging. This RMP should also include plans for plague control including dusting potential reintroduction areas and distributing plague vaccine baits when they	Although the complex has had the plague event, the area could be used for reintroduction of prairie dogs, thereby making it suitable for reintroduction of the black-footed ferret. However, were a surface disturbing activity to destroy the complex, any hope for reintroducing prairie dogs into the complex would be reduced as the tunnel infrastructure could be rendered unusable. As such, any action that would eliminate the complex as a potential reintroduction site for prairie dogs would be considered a significant alteration. A similar approach would be taken for how reasonable minimized surface disturbance would be defined. Beyond this, the actions proposed by the commenter could be implemented with or without specific RMP direction. The purpose of the black-footed ferret management actions are to ensure that the first point in the commenter’s list is possible when the agency responsible for managing the black-footed ferret recovery program proposes to implement the subsequent steps. It is also important to note that BLM manages wildlife habitat, even for threatened and endangered species, but does not actually manage the wildlife itself. While BLM can perform NEPA and assist in habitat preparation, the U.S. Fish and Wildlife Service is responsible for the reintroduction prairie dogs and ferrets.

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		become available. These are long-term needs for prairie dog and ferret conservation	
Special Status Species	Wilderness Society (The), et. al.	6. Special status plants. While we believe that special status plants warrant ACEC designation and will best be conserved via designation, should the BLM refuse to designate ACECs for these resources, we still recommend that strong management prescriptions be developed and mandated. Recommendations: BLM should develop management prescriptions to protect special status plants including: • Inclusion of buffers in order to protect against indirect effects of disturbance. • No Surface Occupancy stipulations throughout the habitat plus buffer, with no opportunity for modification, waiver, or exception. • Right of Way exclusion protections. • No Ground Disturbance protections, with the opportunities for exceptions should fencing/exclosures be needed to further plant conservation goals.	The Draft RMP/EIS, chapter 2 (page 2-23) contains management for special status plant species that would protect them from permitted surface disturbing activities. As such, ACEC designation would not provide any additional protection, and is therefore not needed to protect and prevent irreparable damage to the relevant and important values associated special status species plants.
Special Status Species	Yates Petroleum Corporation (through agent)	As a general statement, Yates finds the new sage-grouse 4-mile seasonal stipulation in the Preferred Alternative to be excessive and unwarranted. Recent analyses by Renee Taylor show that the 2-mile seasonal stipulation is successful in reducing impacts of oil and gas development. The bird populations have been on the rise due to good spring moisture in times of most intense oil and gas development. Wyoming G&FD suggested but withdrew an extension to the hunting season and Montana increased the bag limit from 3 to 5 due to the increased number of birds.	BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. BLM feels there is sufficient evidence to warrant the restrictions found in the Alternative C in the Proposed RMP/Final EIS.
Special Status Species	Yates Petroleum Corporation (through agent)	Page 2-135 The definition of crucial winter habitat is in the judgment of the NRS or biologist. Extending the period for 4 miles from a lek from March 1 to June 30 and then from Dec 16 to March 15 leaves little time for any development. Yates opposes this winter extension. Yates is willing to avoid crucial area on a case by case basis.	Within the Little Snake RMPPA, a number of conservation strategies are being implemented that benefit the greater sage-grouse. BLM will utilize these requirements, including the timing limitations, as the best available scientific supported management to protect grouse, until such time as the strategies change. Current timing limitations include; March 1 to June 30 there will be controlled surface use (CSU) for oil and gas exploration in greater sage-grouse nesting and early brood-rearing habitat, and development and avoidance areas for other surface disturbing activities within a 4-mile radius of

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			the perimeter of a lek; December 16 to March 15, crucial sage-grouse winter habitat would be closed; and BMPs recommend/encourage the limiting of non-surface disturbing activities near active sage-grouse leks to portions of the day after 9:00 a.m. and before 4:00 p.m. during the breeding season, March 1–May 1. Exceptions, modifications, or waivers would be granted according to the criteria established in Appendix E.
Special Status Species	Yates Petroleum Corporation (through agent)	Page 2-16 Alternative C (Preferred Alternative) Yates has seen BLM attempt to restrict oil and gas activity based on surface disturbance per square mile etc. It had always been dropped because that is no way to enforce or monitor. This part assumes that the entire area around the lek is suitable habitat. Yates strongly objects to the 4-mile provision in that the study this is based on did not intent this restriction. Holloran proves that the 2-mile seasonal restriction is protective. A convention well will easily take up to 7 acres of disturbance. That dictates only 160-acre spacing or phased drilling over years (i.e. when one well goes dry, drill the next one). Yates has no problem avoiding crucial habitats, but finds this suggestion unacceptable.	BLM has reviewed the best available scientific research pertaining to energy development and its impact to sage-grouse. The best available research supports the restrictions found in the Proposed RMP/Final EIS, Alternative C.
Transportation and Access Including OHV	Richard and Kathy Arce	DO NOT close any more area to snowmobiles! OHVs do far more damage to the soil, obviously, but snowmobiles don't operate without enough snow. Either leave well enough alone or Alt B as best!	See General Comment Response #33
Transportation and Access Including OHV	Bob L. Barnard	Having reviewed the above referred to proposal, I would like to share the following observations; 1. the volume of information is over whelming 2. the "preferred plan" (3) seems to me to be extraordinarily more restrictive than plan 1. I have over the last few years come to the conclusion that I no longer have the youth or the financial capacity to participate in this lands wonderful outdoors. (I can't carry the backpacks I did growing up nor can I afford the Outfitters.) I object to the extensive general restrictions in the "preferred plan" and urge instead that anyone who damages the area be severely punished. I object to giving Outfitters special considerations. I object to the government’s effort to maximize growth, wealth and development. I support responsible use of the area by the citizens.	See General Comment Response #12
Transportation and Access Including OHV	Sam and Holley Barnes	Our family greatly enjoys riding and camping on BLM land. We, as are the other families that camp with us, are very conscientious about our campsites, cleanliness, fire pits and impact on the	See General Comment Response #12

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		surrounding area. We purchase stickers for our motorcycles and snowmobiles each year and abide by the spark arrestor laws when on BLM as well as forest lands. We implore you to leave things the way that they are (Alternative A) on BLM lands. I have seen far more damage done by overgrazing than by campers and OHV users. If our rights are taken away then where is the impact to the grazing leases.	
Transportation and Access Including OHV	Michael Bartell	Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Bruce Baughman	The Travel Management portion of Alternative A will leave most of these “public lands” open for public use. As an avid snowmobiler the impact of OSV usage does not damage the land and should not be treated the same as OHVs which in many areas are limited to roads and trails for a reason. I believe that there should be no restrictions on winter access routes to and within the Bears Ears District of Routt National Forest. There is very little and confusing data regarding the effects of OSVs on BLM land and resources. I don’t believe that such extensive closures as stated in the Travel Management Alternatives B – D are warranted. I would like to see in the final document for winter Travel Management, wording that guarantees documented roads are not included in any BLM closure. Such wording would alleviate any confusion for winter sports recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Ben Beall	The new RMP appears to be a good document for the future planning of our BLM public lands in Northwest Colorado. I just have one comment at this time and it involves Transportation and Access. My comments arise from my involvement in the Emerald Mountain planning process. One of the main issues of Emerald Mountain is access. I do not think that the draft RMP/EIS addresses the access issue that we have tried to address on Emerald Mountain: restrict motorized access. Please review my comment and use the idea that I am trying to address. BLM may what to revise all the Alternatives. Idea: Nowhere in the draft RMP/EIS that I can find is anything said about limiting access through site specific Activity Plans. Suggestions: Section 2.6.6.1 Travel Management Goal Add Goal: Travel management to conform to approved site specific Activity Plans Transportation and Access Change #5 Alternative "C" to read: Restrict access to meet resource objectives (site specific Activity Plans, seasonal closures, gating etc.) Add to Alternative "C":	BLM manages public lands for multiple use. This means that not all uses need to be accommodated in all areas or at the same time. Activity-level plans can address uses for small areas, as in the example of the Emerald Mountain land exchange and associated SRMA. However, all activity/implementation-level plans must comply with the direction provided in landscape level plans, not the other way around. The alternatives in the Draft RMP/EIS and Proposed RMP/Final EIS reflect this provision. Not all areas would be open or closed to all types of uses in the planning area or open or closed in the same timeframe. Management actions for all resources are provided in the alternatives, including those that provide protection of sensitive resources. Transportation decisions at the landscape level

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		Encourage site specific Activity Plans to designate levels of access. During site specific activity planning public access will be limited to existing uses. Change comparison sheets to conform to above.	(RMP decisions) are limited to area designations (open, closed, limited). Any subsequent activity/implementation plan must comply with the goals, objectives, and decisions contained in the RMP. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in "limited to designated roads and trails" Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. Some areas of the RMPPA has already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes.
Transportation and Access Including OHV	Ed Biederbeck	In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restriction on winter access routes to/ within the Bears Ears District of Routt National Forest. In the final document for winter Travel Management I would like to see wording that guarantees documents roads are not included in BLM closures. Such wording would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Ed Biederbeck	There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources.	See General Comment Response #33
Transportation and Access Including OHV	Ronnie Brant	I DO NOT agree with the wilderness society on all of their proposals. I DO NOT agree that these lands should be closed to all {orv} off road vehicles. I think that restricting ATV and Dirt Bike use would be all that would be needed in this area. 4x4 jeeps and trucks SHOULD NOT be looked at the same as an ATV or Dirt Bike PERIOD.!!! I DO agree that these lands should not be used for gas and oil drilling etc!	See General Comment Response #12
Transportation and Access Including OHV	Brian Bray	I am a native of NW Colorado, an avid outdoors man and nature lover. I have been visiting this area for thirty years and feel I have just scratched the surface. I don't want to see restrictions applied	See General Comment Response #12

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		that may limit my exploring the rest of the area. The reduced access in the forest has made it less enjoyable. I ride dirt bikes, jeep, mtn bike, hike, camp, fish, etc. But, I have also been called a "Greenie" by coworkers for my views on protecting our earth. I buy my OHV stickers, pick up trash, do trail maintenance (erosion control), and try to leave the area better than I found it. I don't ride in the wilderness or disturb bacterial soils. I have raised my children to do the same. There lots of us that help take care of the land, voluntarily. If we have to make a change, wouldn't it be better to make gradual changes? And where will the funds come from to provide the additional officers and vehicles to patrol the areas? Increased fees? Fees that will be used for increased signage, improved roads, establish campgrounds, put up gates... I am opposed to increased usage fees. We need to educate users not restrict them out. Please be lenient in your choices.	
Transportation and Access Including OHV	David Bray	Personal communication with BLM personnel (Casterson April 2007) revealed that use of the classification OHV does not include OSV in the draft document. Having this explained, helped clarify the OHV and OSV presentations in the document. It needs to be made clear in the document that discussion of OHV throughout the document does not include OSV. Without such clarification the document is misleading at times and confusing at other times. This stems from the fact that most people, unless told otherwise, will assume a discussion of OHV includes OSV. Tables, Maps and Figures involving OHV need to have a footnote stating OHV does not include OSV. Of course if the Table, Map or Figure has a category for OSV then the footnote would not be needed. For example, Map 4-7. This map is misleading and incorrect without such clarification. When compared with Map 2-47 there is significantly more transportation and access closure than is shown on Map 4-7. Another example is comparing Table 2-36 and Table 2-37. Both tables are titled OHV, Table 2-36 includes OSV and Table 2-37 does not. If you add the areas closed under Alternative C on each table they do not match. As presented one would assume Table 2-37 identifies all closed areas, it does not. Very misleading. This is just two examples, it goes through out the document.	See General Comment Response #33
Transportation and Access Including OHV	David Bray	In going through the document Table ES-6, Table 2-36, Table 2-42 and Map 2-47 identify extensive areas closed to OSV use, yet there is no supporting data or analysis for this proposed closure. 1. OSV use is not identified as a planning issue. 2. Chapter 3 does not identify OSV use as an existing use.	See General Comment Response #33

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		3. The proposed OSV closure is not identified as alleviating impacts to land resources. 4. The discussion of continuing existing management for the planning area, Alternative A, does not identify environmental consequences resulting from continuing OSV use. 5. The discussion of implementing Alternative C, does not identify any environmental consequences that would be alleviated from closing 793,860 acres to OSV use. Since there is no data or analysis identifying a need for the proposed closure to OSV use, or identification of impacts from use of OSVs, there is no justification for the proposed OSV closure and the selected alternative should not close areas to OSV use.	
Transportation and Access Including OHV	David Bray	Another prominent use of a snowmobile within the planning area is for lion hunting. Closing nearly an additional 800,000 acres (Alternative C) to OSV use could be detrimental to an outfitters livelihood as well as the ability to obtain the needed lion harvest (conflicts with recreation goal identified on page 2-78). North and east of Craig this would certainly be true. West of Craig it would depend on the year. If the year was open, shallow accumulation of snow, ATVs and four wheel drives could be used to get around. If the year was not open it could be detrimental, particularly if there were a few snow years in a row. An exception to this would be areas above approximately 7500 feet where snow accumulation generally prevents conventional travel, such as the Douglas Mountain area. (personal communication with DOW, Bauman April 2007) I do note that most of the Douglas Mountain area is proposed to be left open to OSV use.	See General Comment Response #33
Transportation and Access Including OHV	David Bray	Personal communication with BLM personal (Husband and Casterson, April 2007) revealed that the proposed OSV closure (Alternative C) was a result of trying to be consistent with seasonal restrictions to oil and gas. This is certainly not an application of science or a justifiable reason for excluding a use from sixty five percent the planning area. Of the areas proposed to be left open to OSV use a large portion would rarely accumulate the snow depth to support OSV use or is not accessible. As for consistency, it is certainly not achieved with the proposed OSV closure as the areas would still be open to other modes of travel, be it truck, ATV, foot, snowshoeing or skiing.	See General Comment Response #33
Transportation and Access Including OHV	Jimmy Britton	I am writing to voice my support of BLM Alternative A Plan for the Little Snake Resource Management Plan Revision, because unaltered use of public lands is important to me and my fellow	See General Comment Response #33

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		snowmobilers. Public lands should be just that, -"Public lands", to be used by the public. I suggest there should not be any restrictions on winter access routes to or within the Bears Ears District of Routt Natl. Forest and that documented or current roads not be included in the BLM closures. Closure of these roads would prevent access to areas of winter snowmobiling and family recreation, which is enjoyed by many people throughout Colorado. I believe OSV closure would severely effect the winter economy of this entire area of the state of Colorado. To my knowledge, there is no socio-economic analysis of Over Snow Vehicles on BLM land. I feel this issue should be address if the BLM plans to exclude snowmobiling in this area.	
Transportation and Access Including OHV	Rhonda J. Britton	I strongly urge that the final document of the Travel Management portion of the Resource Management Revision place no restrictions on winter access to or within the Bears Ears District of the Routt NF. I feel the wording of the document should guarantee that documented roads not be included in the BLM closures.	See General Comment Response #33
Transportation and Access Including OHV	Sheila Bruggen	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	William & Keri Buckman	I endorse the travel management portion of Alternative. In the final document for winter travel management I would like to see wording that guarantees documented roads are not included in BLM closures. Such working would alleviate confusions for winter recreation. As the following - There's little and confusing analysis stating effects of OSV and OHV on BLM land and its resources. Therefore closure should not be as extensive as presented in Alternatives B-D.	See General Comment Response #33
Transportation and Access Including OHV	Jeffrey Carlson	In the final document for winter Travel Management I would like to see wording that guarantees documented roads are not included in BLM closures. Such wording would alleviate confusion for winter recreation participants. It is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives B – D. There is no socio-economic analysis of OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling.	See General Comment Response #33
Transportation and Access Including OHV	Rocky Carr	I would like to see these areas (Sand Wash and Vermillion) stay the same as they are now. If you take this riding area away from people there is a good chance they will start riding in areas where you don't want them to. The trails are already established in Sandwash and	See General Comment Response #12

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		Vermillion and can be controlled.	
Transportation and Access Including OHV	Ed Colclasure	Please register my vote for keeping as much public land open for ORV use in Colorado as possible. That said I don't think open use in most areas is a good idea, but designated routes should be delineated. Designated routes, enforcement of those routes and noise enforcement should all be part to the plan. Unfortunately the only "management strategy" that EVER seems to be applied to ORV uses is complete closure since it is the cheapest option. We (the ORV community) are faced with closures ever year, but never any new trails openings despite an increase in the popularity of the sport. ORV users are double taxed to use public lands when no other user group is, but yet we enjoy by far the least access. Please no further closures!	See General Comment Response #12
Transportation and Access Including OHV	Colorado 500	We are, however, concerned about the 203,100 acres designated as limited to designated routes as we wonder when, if ever, routes will ever be designated in these areas. Slowness in designating routes can create de facto non-motorized area while the original intent is otherwise. The preferred manner is as you've done on the bulk of the lands by designating travel to existing routes now and address designation issues in the Travel Management Plan. We note your indication that your intent is manage these areas as limited to existing routes initially but feel the RMP should be changed to the existing route limitation, understanding that with Travel Management, the designation would shift to designated routes.	See General Comment Response #10
Transportation and Access Including OHV	Colorado 500	Over the snow motorized: We are confused by the large areas proposed as closed to over the snow vehicles. The areas to the east near Black Mountain can have a sustainable snow cover that would protect natural resources and some of these areas are critical in providing snow access to Forest Service lands. The lands to west have generally not had snow cover sufficient to encourage snowmobile use in the past. There is no reason to ban their use as there could be occasions when adequate snow cover persists to provide motorized recreation opportunities in the winter. Your proposal would also prohibit grazing permittees and the mineral extraction users from utilizing a snow machine when that means of transportation would clearly provide the least resource damage (over the snow instead of plowing). A little common sense should prevail in dropping this restriction.	See General Comment Response #33
Transportation and Access Including OHV	Colorado Division of Wildlife	CDOW can accept travel limited to existing roads and trails resource area wide IF commitment is made to rapidly inventory roads. Otherwise the provision is unenforceable and the resource area	See General Comment Response #10

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		should move to designated roads and trails over the majority of the area, as in Alternative D. CDOW strongly supports BLM's efforts in the draft RMP to alter travel management status in most of the LSFO from open to limited. Successful implementation of an existing roads and trail limitation over such a wide area will require an immediate commitment to inventory existing roads and trails rapidly to manage additional proliferation. In the absence of this commitment, and substantially increased compliance checks and enforcement, limitation to existing roads and trails is unlikely to resolve many of the travel management problems that are occurring and the LSFO should move toward limited to designated roads and trails status as described in Alternative D.	
Transportation and Access Including OHV	Colorado Off-Highway Vehicle Coalition (COHVCO)	The DEIS limits travel to existing roads and trails as per Washington directives. We agree strongly that this approached be maintained until site specific analysis can be done as part of comprehensive travel management planning. On the other hand, there is great concern over the treatment of the 203,100 acres that require designation rather than default to existing roads and trails. We request that these acres be subject to the existing routes standard. Our concern stems from the indefinite time frame that future designation implies with the myriad problems that ultimately arise to slow the process. We encourage similar treatment applied to other areas allowing existing roads and trails. Let travel management and site specific analyses create designations that will stand the test of time and future sustainability rather than a limbo of uncertainty.	A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in limited Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Areas that are identified as limited in the RMP and do not have completed route designations will be managed as limited to existing routes until completion of Transportation Plans. This transportation planning will be prioritized such that the key habitat areas will be completed first. The areas that Alternative C of the Draft RMP/EIS designates as limited to designated roads and trails has already been through a route designation process prior to this RMP revision, therefore there are routes that are designated on the ground. A map has been added to the Proposed RMP/Final EIS to identify these routes.
Transportation and Access Including OHV	Colorado Off-Highway Vehicle Coalition (COHVCO)	We are confused by the large areas proposed to be closed to over the snow vehicles. The areas to the east near Black Mountain can have a sustainable snow cover that would protect natural resources and some of these areas are critical in providing snow access to Forest Service lands. The lands to west have generally not had snow cover sufficient to encourage snowmobile use in the past. There is no reason to ban their use as there could be occasions when adequate snow cover persists to provide motorized recreation opportunities in the winter. Your proposal would also prohibit grazing permittees and the mineral extraction users from utilizing a snow	See General Comment Response #33

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		machine when that means of transportation would clearly provide the least resource damage (over the snow instead of plowing it). A little common sense should prevail in dropping this restriction.	
Transportation and Access Including OHV	Colorado Off-Highway Vehicle Coalition (COHVCO)	The current BLM policy resulting from the SUWA v. BLM seems to indicate that the agency does not have the authority to make a binding determination on the validity of R.S. 2477 right—of—way claims. This does not, however, prevent the agency from making informal, non-binding determinations (DBDs) for its own land use planning and management purposes. NBDs can certainly also be entered into with the county for maintenance and continued use of the routes claimed by Moffat County.	RS 2477 assertions are addressed through the 2006 Departmental Policy, which brings Departmental policy in line with the Tenth Circuit Court of Appeals ruling in Southern Utah Wilderness Alliance v. Bureau of Land Management, 425 F.3d 735 (10th Cir. 2005), as well as subsequent BLM policies implementing the Secretary's memorandum of March 22, 2006. While the presence of RS 2477 claims may be taken into consideration during the planning process, non-binding determinations are to be identified and made on a case-by-case basis during implementation of the RMP. As the SUWA v. BLM court notes, ultimately deciding who holds legal title to an RS 2477 right of way "is a judicial, not an executive, function." 425 F.3d at 742.
Transportation and Access Including OHV	Colorado Snowmobile Association	The draft EIS for the Little Snake RMP does not define an OSV and improperly lumps snowmobiles into a broad but incomplete definition of off-highway vehicles. We are therefore strongly opposed to the travel management proposals related to OSVs in Alternatives C and D of this Draft EIS. Our specific comments are as follows: Failure to Define OSV and improper use of OHV Definition: The Glossary in Chapter 7 provides an extensive list of definitions relevant to the Draft EIS yet fails to define an over-the-snow vehicle (OSV). The closest related definition appears to be that for an Off-Highway-Vehicle (OHV) on page 7-12. However, that definition fails to specifically include any reference to "over snow" travel and simply states the following: Off-highway vehicle (OHV). Any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) any non-amphibious registered motorboat: (2) any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) vehicles in official use; and (5) any combat or combat support vehicle when used for national defense. From H-l 601-1, BLM Land Use Planning Handbook). This is in conflict with Colorado state law which defines an off-highway vehicle in 33-14.5-101 – Definitions. It states: As used in	See General Comment Response #33

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		this article, unless the context otherwise requires: (3) "Off-highway vehicle" means any self-propelled vehicle which is designed to travel on wheels or tracks in contact with the ground, which is designed primarily for use off of the public highways, and which is generally and commonly used to transport persons for recreational purposes. "Off-highway vehicle" does not include the following: (a) Vehicles designed and used primarily for travel on, over, or in the water; (b) Snowmobiles; (4) "Off-highway vehicle route" means any road, trail, or way owned or managed by the state or any agency or political subdivision thereof or the United States for off-highway vehicle travel. Additionally, a snowmobile is /defined separately in 33-14-101 - Definitions. It states: As used in this article, unless the context otherwise requires: (11) "Snowmobile" means a self-propelled vehicle primarily designed or altered for travel on snow or ice when supported in part by skis, belts, or cleats. "Snowmobile" does not include machinery used strictly for the grooming of snowmobile trails or ski slopes. Other comparable federal planning actions typically are more specific in their definition of an over-the-snow vehicle and often differentiate between them and other wheeled OHVs since their effects can be quite different. One example is the U.S. Forest Service Motor Vehicle Travel Management Rule (Part 212.1) which specifically defines an OHV and OHV as follows: • Off-highway vehicle. Any motor vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain. • Over-snow vehicle. A motor vehicle that is designed for use over snow and that runs on a track or tracks and/or a ski or skis, while in use over snow. Additionally, Part 212.51 (a) (3) of the Forest Service Rule specifically exempts over-snow vehicles from the blanket requirement that all other wheeled motor vehicles to be restricted to operation only upon designated roads, trails and areas. This is significant in respect to public lands management since, even though the broader Forest Service definition of an OHV ("over land, water, sand, snow, ice, marsh, swampland, or other natural terrain" versus the BLM only "over land, water, or other natural terrain"	

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		definition) is more specific to "over snow," the agency still felt it was appropriate to specifically segment out OSVs because of their distinctly different operational characteristics. There is also precedent within BLM planning processes to treat snowmobiles /OSVs separately from other wheeled vehicles. One specific example is that, in the Draft Casper (Wyoming) RMP and EIS (Volume 2, Glossary page 7), it states: Off-Highway Vehicle (OHV) Management Designations: Designations apply to all off-road vehicles (ORVs) regardless of the purposes for which they are being used. Emergency vehicles are excluded. The ORV designation definitions have been developed in cooperation with representatives of the U.S. Forest Service, National Park Service, and the Bureau of Land Management (BLM) state and field office personnel. The BLM recognizes the differences between ORVs and over-snow vehicles in terms of use and impact. Therefore, travel by over-snow vehicles will be permitted off existing routes and in all open or limited areas (unless otherwise specifically limited or closed to over-snow vehicles) if they are operated in a responsible manner without damaging the vegetation or harming wildlife. We would suggest that it is appropriate to add similar language in this document and to analyze snowmobiling within the Little Snake Area in that same context.	
Transportation and Access Including OHV	Colorado Snowmobile Association	We are very concerned that this Draft EIS did not properly analyze the needs and effects of snowmobiling as required by the National Environmental Policy Act (NEPA). Specifically, this Draft EIS erred by proposing to close a massive amount of BLM lands; (up to 861,030 acres) to "over-the-snow vehicles" (OSV) without proper and substantive / analysis.	See General Comment Response #33
Transportation and Access Including OHV	Colorado Snowmobile Association	Page ES-3: Issue 3: Transportation and Travel Management (1st paragraph) - there is a long list of "recreational activities that occur throughout the area..." that goes on to state "...and off-highway vehicle (OHV) use including motorcycles, all-terrain vehicles (ATVs), and full-size, four-wheel drive vehicles such as jeeps and sport utility vehicles (SUVs)." If snowmobiles are intended to be deemed OHVs within this plan, they are conspicuously absent from this list, which also extends to the fact they were conspicuously absent from the analysis.	See General Comment Response #33
Transportation and Access Including OHV	Colorado Snowmobile Association	Page 3-121: 3.2.6 Transportation and Access (4th paragraph) - it states that "Motorized access to the public lands within the RMPPA is provided by routes of all kinds and sizes ranging from State	See General Comment Response #33

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		highways to paved roads, gravel roads, and jeep and OHV trails." There is no reference to the snowmobile trail routes that provide important access to and through the BLM lands.	
Transportation and Access Including OHV	Colorado Snowmobile Association	Page 3-124: 3.3.6.3 Off-Highway Vehicles (first paragraph) - it states that "OHVs include both motorized and non-motorized vehicles, of varying sizes and capabilities, from ATVs and motorcycles to trucks and sport utility vehicles (SUV), over snow vehicles, and bicycles." First, this is the first reference (406 pages into the document) to an over-snow vehicle as an OHV. But as mentioned earlier, this is a stretch of the BLM OHV definition cited in the Glossary. Second, this statement also improperly includes "bicycles" as OHVs since the BLM OHV definition clearly states "any motorized vehicle," which a bicycle is not. These are two examples of loose and improper use of the term "OHV."	BLM has revised chapters 2, 3, and 4 to more clearly define OHV and OSV management. BLM has also reviewed and revised uses of the term “OHV” throughout the document, including statements or insinuations that non-motorized vehicles are also OHVs.
Transportation and Access Including OHV	Colorado Snowmobile Association	Another question related to these potential habitat closures is whether or not travel will be allowed on existing/established routes through any new habitat closure areas? This is critically important since such a massive shift in policy has the potential to eliminate access to other important adjacent private, public, and/or other BLM property where snowmobiling is allowed. We do not see any provision for this in the current document - but it certainly needs to be considered and allowed to prevent undue closures and loss of public access for snowmobilers. On the surface, proposed OSV closures appear to be the result of a broad-brushed approach versus site-specific reasoning - which portrays an alarming scenario to our members. While we understand there are large portions of the overall plan area which may be low snowfall areas, and therefore not prime snowmobiling areas but at the same time important wintering areas for wildlife, the magnitude of potential closures seems excessive. We suggest that you add analysis information to this plan that identifies "acreage suitable for OSV use" based upon average snowfall conditions and other climatic and topographic factors. This could help all involved (the agency and the public) better understand what "real" snowmobiling areas are being identified for potential closure versus acreage that really isn't conducive for consistent snowmobiling - but yet the potential for closure looks terrifying on paper.	See General Comment Response #33
Transportation and Access Including OHV	Colorado Snowmobile Association	BLOCKING ACCESS TO OTHER PUBLIC LANDS - CLOSURE OF COUNTY ROADS There are three permitted trails that we believe may be compromised by the potential -1 closure of three small areas of BLM lands. These closures would block access to other public	BLM route restrictions do not apply to valid existing routes, including county roads, permitted uses, and administrative uses. The county has jurisdiction over county roads; BLM cannot close them.

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		lands on the Routt National Forest, which are in direct contradiction to the document which states "effort has been made to not block access to public land." If this is truly the intent, then the document needs to be clear that access to adjacent lands will not be blocked by the proposed actions. The three trails that would potentially be blocked are the Black Mountain Trail, the Wilderness Ranch Trail, and the Freeman Trail. All three of these trails follow county roads for some part of the trail. The local club has obtained permission for this activity from the County Commissioners. All three trails are also permitted by the U.S. Forest Service since they are primarily on the forest and only cross a corner of BLM lands proposed to be closed. While BLM personnel in the Little Snake Field Office have indicated that trails which follow existing county roads are "exempt" from closures, the document does not clearly indicate that this is true. Please address this important access issue.	
Transportation and Access Including OHV	Colorado Wildlife Federation	We do support the proposal to develop a detailed transportation plan. Roads are the greatest problem with respect to habitat fragmentation, producing disturbance of big game birthing, rearing and wintering habitat, road kill (as discussed below) and increased access for poaching. For example, it has been well documented that elk prefer to be secluded at least 1.7 miles from the nearest road and pronghorn prefer undisturbed blocks of at least 600 acres.	See General Comment Response #11
Transportation and Access Including OHV	Andrea Cousins	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Phil Crable	As an OHV user, I am firmly against closing more public land to OHV use. I am also a hunter and do appreciate that there are some areas where OHV use is currently restricted. I do like the fact that I can walk several miles to my hunting spot and not have to worry about a quad coming right by the spot that it took me almost 2 hours to get to right as its getting light. It is my opinion that public land should be open for public use. Much of the public land where I ride would be unreachable by foot without at least several days' worth of hiking, and unfortunately, very few of us have that much time available to us these days. I am all for responsible use of public land so that it is preserved, but it seems the pendulum has swung too far to the conservation side. I would prefer to see more trails open, not closed. At one time I had thought there was a promise by the government agencies to only	See General Comment Response #12

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		close trails in an area if an equal amount of trail was opened somewhere else close by. To date, I have not seen this in practice; trails are closed and no other areas are opened. The practice of purely just maintaining what trails currently exist does not help with the growing population of OHV users. I think it is a much better idea to spread that growing population of users out over more public land, not less. Concentrating more people into the same size or even worse, a smaller area is a bad idea for many things, especially OHV use.	
Transportation and Access Including OHV	Derek C. Crawford	I think the BLM should use alternative A, leaving the land the way it is. I think the BLM should continue to allow OHV and snowmobiles on this land because of the many reasons listed in the following essay. First of all, I think OHV and snowmobiles use should continue because it affects so many people in so many ways. It's a family sport. Fathers whom live at the bar, kid that only find excitement in video games and the rest of the family all come together to enjoy the outdoors and our healthy sports. However, the people this plan would affect the most are the teenagers. Teens who want action, thrill and adrenaline usually take drugs/or alcohol to experience these feelings. But our sports provide a much healthier way to get these feelings. When I ride I feel enjoyment, accomplishment, freedom and thrill. It makes me feel like I am worth something and nothing can touch me, I feel free. I want to preserve the land as well as these senses of freedom. We pay you for the use of our public land, but really we pay for our extermination. So if you really want preserve something, preserve our freedoms. The second reason I think that the BLM should use alternative A is that OHV and snowmobiles don't affect the land as much as you think. Some people see our sport as "terrorizing nature", but we care as much for our lands as anyone else. I myself have ridden the dreaded ATV to look at rocks for nearly five hours. Even my friend whom has troubles staying still has sat and enjoyed nature and its beauty for hours while using an OHV. My point is, we riders have a passion for the lands we ride on. Almost all the trails where made for sightseeing rather than trying to go as fast as we can. Just like how hunters have a passion for the animals they hunt. They respect the animals just like how we respect our lands. Thirdly, the alternative C doesn't make sense to me. Why is it only directed at OHV and snowmobiles? Some people may say our sport is dangerous to the environment. Now I'm not saying they are the most wonderful things, but alternative C would cause some think far	See General Comment Response #12

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		worse for the environment and the people, congestion. Congestion is one of the most dangerous things for the environment and the people. Making riders congest to a small area will cause injury to riders, pollution, noise, erosion, and other harmful things. But if you kept the uses spread out there would be less of an impact. So why would the BLM want chaos in a small area than moderate use in a moderate area? Finally, the last reason why I think OHV and snowmobile use should continue on BLM lands is because they don't affect the land as much as they may think. There has been riding of snowmobiles and OHV for nearly forty years on these lands and already there is less use. Also OHV and snowmobiles forty years ago where less fuel efficient or safe for the environment. So, one might say by now the ground and animal life should be destroyed after that much use. But this is not the case according to the Colorado Environmental Coalition. They stated on Thursday of April 19, 07 on page 23 of the Steamboat Today that "the BLM Little Snake Resource Area" is part of “Colorado’s enchanted landscape" and has “abundant wildlife populations" after nearly forty years of OHV and snowmobile use. So you see, OHV and snowmobiles are not as harmful as they sound if they kept these lands pristine sense they have been used here. So now I hope you see why I think OHV and snowmobile use should continue on BLM lands and why alternative A is the best alternative. Think about how it will affect the community. We are not asking much, just let the public lands stay open to the public.	
Transportation and Access Including OHV	Michelle Crawford	Anyone with any kind of physical disability or anyone at an older age can never enjoy the land that they have loved and had access to for many years cause you can't expect them to walk up a mountain.	See General Comment Response #12
Transportation and Access Including OHV	Rhonda Crawford	Alternative C & D makes no sense at all - why take away something everyone can enjoy? Everybody has their own hobbies and 991,920 acres gives plenty of room for people to do what they please, including any OHV sport without being over crowded. 21,940 acres better? Not for me! By decreasing our land use, you increase the volume of what's left. By restricting OHVs you’re discriminating against those with physical disabilities.	See General Comment Response #12
Transportation and Access Including OHV	Jennifer DiMeo	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10

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Transportation and Access Including OHV	Don Elliott	I am going to speak for ever older person in America that cannot walk like we used to. We need to be able to use our 4 wheeler to get into a hunting area, and to pack an animal out with in the unlikely event that we would get one. Also, if my wife and I want to go back in to the forest and set up a tent and just enjoy the wilderness. I can't put a pack on my back anymore, like I used to and need a trail open into the forest for that too. Another issue is that we can't afford to take off with the fuel prices like we used to, so need to find recreation nearer to home. This means the forests for us. I am asking you to fight for our rights on our lands. The Northwestern part of the state is just as important to us all as is, Montrose, Gunnison, and the Western Plateau.	See General Comment Response #12
Transportation and Access Including OHV	Environmental Protection Agency (EPA), Region 8	The DEIS contains proposed decisions on which areas will be open, limited, or closed to OHV travel, although a separate travel plan will be prepared at a later date. We did not see information on potential water quality concerns associated with areas open to OHV travel. EPA recommends that this criterion be addressed in the EIS.	Impacts on water quality from OHV use were addressed in the Draft RMP/EIS under Section 4.3.3, Impacts on Water Quality. The Proposed RMP/Final EIS has been revised to better highlight these impacts.
Transportation and Access Including OHV	Bill Farley	The Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. BLM Preferred Alternative C will be imposable to enforce snowmobilers and law enforcement will not be able tell which areas are open or closed. I could not find an analysis stating effects of Over Snow Vehicles in the area, the analysis needs to be done before any area is closed to over the snow vehicles. I could not find the socio-economic analysis of Over Snow Vehicles for the area, analysis needs to be done before any area is closed to any OHV vehicles	See General Comment Response #33
Transportation and Access Including OHV	Form Letter #2	Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Form Letter #3	Off-road vehicles should be restricted to designated routes.	See General Comment Response #10
Transportation and Access Including OHV	Form Letter #6	It should also improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. This will keep OHVs on designated routes where their impacts will	See General Comment Response #10

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		be minimized in the overall ecosystem.	
Transportation and Access Including OHV	Form Letter #8	In particular, road construction in the LSRA must be limited. If roads are created for the extraction of minerals, they must be immediately reclaimed post-development and not added to any travel management system.	The construction of new roads is an activity-level action which would trigger the NEPA process. BLM only authorizes construction of new roads when there are no other means for energy companies to access their valid existing rights. BLM requires oil and gas operators to reclaim surface disturbance, including all rights-of-way, per On Shore Order #1.
Transportation and Access Including OHV	Form Letter #8	Cultural resource sites must be protected from off-highway vehicle damages by instituting a designated trail Travel Management Plan.	See General Comment Response #11
Transportation and Access Including OHV	Form Letter #8	If BLM must propose an “open area” in south Sand Wash, the boundaries must be set forth so that there is no confusion at time of implementation. The boundaries for such an area should not go past Moffat County Road 67 to the East, State Highway 318 to the South, BLM route 2048F6 to the West and Moffat County Road 48 to the North. This is an area of approximately 22 square miles, an area that may be too large for the BLM to properly manage and enforce. Instead BLM must consider a much smaller intensive use area that will allow for enforcement of regulations as well as provide adequate safety precautions. Additionally, the entire perimeter of any open or intensive use area must be signed in order to provide a clear distinction of what and where activities are permissible and clearly mark the boundaries of the area. This area will be managed for intensive motorized recreation with a concentration of motorized trails for different use levels. Outside of the open area, all travel will be limited to designated routes only.	See General Comment Response #10
Transportation and Access Including OHV	Form Letter #8	Livestock producers should be exempt from staying on designated routes and have the option of utilizing existing routes that are not closed. BLM will collaborate with producers to determine what routes should be closed. The remainder of the Resource Area will be limited to designated routes only for motorized travel. Also, enforcement is a vital key in travel management. Without adequate law enforcement, all planning will become moot.	BLM OHV restrictions do not apply to uses that are expressly authorized by the authorized officer, or otherwise officially approved. This includes uses by livestock operators in the pursuit of day to day management of their allotments such as, but not limited to, range improvement maintenance. Valid existing routes, including county roads, permitted uses, and administrative uses are also not included in these restrictions.
Transportation and Access Including OHV	Form Letter #8	All routes will be considered closed unless posted otherwise. • The entire Little Snake Resource Area must be managed by a designated route system. All motorized travel will be limited to designated trails.	See General Comment Response #10

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		• BLM must increase enforcement in order to prevent route proliferation and other illegal activities.	
Transportation and Access Including OHV	Form Letter #8	•BLM must establish an education and enforcement program for motorized users.	See General Comment Response #10
Transportation and Access Including OHV	Form Letter #8	•BLM must use its discretion and not make "non-binding" determination on Moffat County's RS 2477 claims.	RS 2477 assertions are addressed through the 2006 Departmental Policy, which brings departmental policy in line with the Tenth Circuit Court of Appeals ruling in Southern Utah Wilderness Alliance v. Bureau of Land Management, 425 F.3d 735 (10th Cir. 2005), as well as subsequent BLM policies implementing the Secretary's memorandum of March 22, 2006. While the presence of RS 2477 claims may be taken into consideration during the planning process, non-binding determinations are to be identified and made on a case-by-case basis during implementation of the RMP. As the SUWA v. BLM court notes, ultimately deciding who holds legal title to an RS 2477 right of way "is a judicial, not an executive, function." 425 F.3d at 742.
Transportation and Access Including OHV	Form Letter #8	•BLM must establish protocols that limit new road building as well as mitigative measures that will prevent any increase in fugitive dust emissions.	The building of new roads is an activity-level action which would trigger the NEPA process. This would address impacts from fugitive dust and establish any necessary mitigation.
Transportation and Access Including OHV	Form Letter #8	BLM must limit any new road building as well as mitigate the effects of sedimentation and erosion that new and existing roads cause.	The building of new roads is an activity-level action which would trigger the NEPA process. This would address impacts from sedimentation and erosion and establish any necessary mitigation.
Transportation and Access Including OHV	Stanley D. Fox	Prefers Alternative A. In the final draft of the Resource Management Plan Revision, Travel Management, there should not be any restrictions regarding winter access routes to and within the Bears Ears District of Routt National Forest. In the final draft for the winter Travel Management I would like to see wording that would guarantee that documented roads are not included in the BLM closures. There are conflicting statements regarding OSV on BLM land and its resources.	See General Comment Response #33
Transportation and Access Including OHV	Stanley D. Fox	There are conflicting statements regarding OSV on BLM land and its resources. Closures should not be as extensive as first presented in Travel Management Alternatives B-D.	See General Comment Response #33

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Transportation and Access Including OHV	Charles Garvin	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	John Goldsmith	In the final document of the resource management plan revision, travel management, there should be no restrictions on winter access to/within the Bears Ears District of Routt National Forest. In the final document for winter travel management I would like to see wording that guarantees documented roads are not included in BLM closures. Such wording would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Sharon R. Green	I am an OSV and ATV owner/user and I endorse the Travel Management portion of Alternative A, as continued, unaltered use of public lands has always been and remains important to me. The Travel Management portion of Alternative A leaves “public lands” open for use. Also in the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest.	See General Comment Response #33
Transportation and Access Including OHV	Sharon R. Green	There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive	See General Comment Response #33
Transportation and Access Including OHV	Ruth Greenwood	With reference to your plan revision of Moffat & West Routt County, I strongly oppose the closing or severely restricting the use of BLM lands to vehicles. From our observations in using these lands for motorcycling, 4 wheeling and horseback riding there seems to be considerably less damage done than what is being allowed to ruin forest lands from the pine beetle or the restriction of timber cutting in areas like the blow down that are causing a soon to be fire threat.	See General Comment Response #12
Transportation and Access Including OHV	Amy Gregorich	I would like to comment on the new BLM travel management proposal which is on the table right now. I am an active OHV rider and trail advocate, and I see closing trails and access to trails for OHV as a growing concern for safety reasons. The recent trends are for OHV accessible lands to be closed, while the number of OHV users is growing. There is also a lot of tourism in the Northern Colorado area which is driven by OHV use. Limiting the access to these lands only increases the use for each trail which accelerates any trail deterioration and necessary maintenance. The resulting density also raises serious safety issues as more riders crowd in smaller areas. A few of the more popular areas are already getting	See General Comment Response #12

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		reputations for being unsafe simply due to rider numbers. Please consider these safety factors when making your decisions. I would like to vote in favor of at least keeping what is currently open - and ultimately opening more land to OHV use.	
Transportation and Access Including OHV	Jerre Guthals	I endorse the Travel Management portion of Alternative "A" as continued, unaltered use of Public Lands has always been important to me. The Travel Management portion of Alternative "A" leaves "Public Lands" open for use. In the Final Document of the Resource Management Plan Revision, Travel Management, no restrictions should be placed on winter access routes either to or within the Bears Ears District of the Routt National Forest. In the Final Document for winter Travel Management, wording that guarantees documented roads are not included in BLM closures needs to be included. This wording would eliminate confusion for winter recreational users.	See General Comment Response #33
Transportation and Access Including OHV	Jerre Guthals	There is little and confusing analysis stating OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives "B&D". Wildlife protections, as stated seem more tailored to the oil and gas industry and should not be as extensive as presented in Alternatives "B&D".	See General Comment Response #33
Transportation and Access Including OHV	Scott A. Hahn	I support the limitation of OHV vehicles to roads, however strongly believe they should be allowed for recovery of legally taken game, travel by anyone in response to an emergency, parking nearby the road for camping, maintenance of fences and structures at public/private property boundaries, use pertaining to other legal activities including, but not limited to, wood cutting and gold panning, rafting, hang gliding. I am not sure what the BLM considers existing roads but I think it may likely not include the many 4 wheel drive trails. Use should be allowed on all maintained and historical trails that are used by 4 wheel drive vehicles. 4 wheel drive roads should not be vacated and closed. This usually is at the request and benefit only of wealthy absentee land owners.	Legal cases address RS-2477 claims, such as SUWA v. BLM (case 04-4071 & 04-4073), which addressed the legal definition of a road. Further, IM-2006-173 and Technical Note 422 address BLM's terminology used for referencing route nomenclature. The Proposed RMP/Final EIS has been modified to clarify the terminology used. Subsequent implementation-level travel planning will address the designation of specific routes using the direction from Technical Note 422.
Transportation and Access Including OHV	Rick Hammel	Travel Management Page 2-104 It is our opinion that the BLM is not in keeping with E.O. 11644 that says OHV impacts must be minimized. (Emphasis added) when preferring Alternative C. Specifically, Table 2-36 defines two types of Limited Access; Limited to existing roads and trails and Limited to designated roads and trails. We therefore submit that Alternative D be implemented in the travel management section. Once an OHV user has cut a trail cross-country, that trail has	See General Comment Response #10

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		become existing, because it is there. The original user was in violation of the regulation "Limited to Existing." All other users are within the law, because that route is existing. The use of Limited to Existing routes of travel will invite proliferation of new routes within the 1,039,500 acres where that designation is utilized. Enforcement will be extremely difficult, where if Limited to Designated Roads and Trails, as in Alternative D were to be selected by the BLM, enforcement would be far simpler. Selection of route would have to be up to a citizen committee and the BLM, to determine what routes are appropriate and which are not. The term, "If It Is Not Signed, Do Not Use It," could be used to help in compliance. By the use of designated routes, the proliferation of new routes would be reduced. The fragmentation of habitat would be reduced. The management of OHVs would be greatly enhanced. This writer can see no negative aspects to designated routes. The argument by the OHV community has been, "who is going to choose what trails will be designated?" The answer to that argument would be, "The BLM and you!" This puts the onus on the OHV community to become involved with the BLM travel planning.	
Transportation and Access Including OHV	Rick Hammel	Alternative D (Page 2-106): Completion of the travel management plan within 5 years is too great a time frame. It is our position that the time frame must start at the signing of the ROD and be completed within three years.	See General Comment Response #10
Transportation and Access Including OHV	Janet Hansen	- Develop a designated route system for ATV's (off road vehicles) for the entire Little Snake Resource Area of limited length to minimize impact. Eliminate the proposed Sand Wash ORV unrestricted "play" area -- why should motorized vehicles monopolize and destroy areas for other human recreation, let alone for the sage grouse and large mammals?	See General Comment Response #10
Transportation and Access Including OHV	Anita Hawkins	We have noticed deterioration of BLM Land and natural resources in Routt and Moffat counties due to increasing use and abuse by off-road vehicles. New vehicles have been developed to be more powerful and capable of driving over larger obstacles. Unfortunately, these developments allow, and their advertisements encourage, greater abuse of the land. We respect individuals' rights to recreate in BLM land. However, we believe regulations need to be implemented and enforced to protect the land, riparian areas, and the wildlife habitats. We would like to see motorized use restricted to existing roads and trails.	See General Comment Response #11
Transportation and Access	Hunter Hayes	Hi this is Hunter I am writing to say that I think all land should be open to OHV use and if for some reason that is not possible it	See General Comment Response #12

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Including OHV		should at least stay the same. I think that people that don't live here or have never been here or use the BLM should have a say. If the land is shut down to OHV use the elderly that may not be able to move around will not be able to hunt even if they have been doing it their whole life. hunting in general will be greatly reduced cutting out much of the income in the area not to mention the over population of the elk herds and motorsport stores in the area will go under besides the few who race dirtbikes and snowmachines	
Transportation and Access Including OHV	Dave Helgeson	Snowmobiling is a family sport. We look forward to traveling to new areas to snowmobile each winter. Snowmobiling helps the local economy and gets families recreating in the winter. The Travel Management portion of Alternative A will leave most of these "public lands" open for public use. Snowmobiles do not damage the land, and should not be treated the same as OHVs, which in many places are restricted to roads and trails for a reason. There is very little and confusing analysis stating effects of snowmobiles on public land and its resources. Therefore, closures should not be as extensive as presented in Travel Management Alternatives B – D. In the final document for winter Travel Management I would like to see wording that guarantees documented roads are not included in any BLM closure. Such wording would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Joanne Hesselink	Why must any more land be opened to off road vehicles? What is wrong with good hiking trails, and even land left nearly untouched by humans? Please choose proposal D with limited access motorized vehicles. Additional well drilling could be negated with more emphasis on energy conservation and increased use of renewable energy sources.	See General Comment Response #11
Transportation and Access Including OHV	Howard County Bird Club	We urge BLM to provide protection against off-road vehicles operating where they are not appropriate. Our members use ORVs to reach areas of wildlife habitat, and we depend on agencies such as BLM to advise us, through regulations and closures, which routes are appropriate and which are not. The plan should require ORVs to stay on routes designated for their use. BLM should close all unauthorized ORV routes that enter critical wildlife habitat or riparian zones or that will deteriorate with increasing ORV traffic in the years ahead. All the proposed wilderness areas should be closed to ORV.	See General Comment Response #11
Transportation and Access	Cherie Howe	I think opening 7% of the t Little Snake Resource area, would in my opinion, be more than enough land for the 'recreational vehicles usage', and furthermore, I believe that perhaps it's time that those	See General Comment Response #11

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Including OHV		using the area for recreational vehicles should be licensed, on a yearly basis, just like anglers, and hunters!	
Transportation and Access Including OHV	Barbara Hughes	Establish a designated route system for the entire Little Snake Resource Area. It should eliminate or significantly reduce the size of the proposed Sand Wash Basin unrestricted motorized off-road vehicle "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Jack Hughes	I endorse the Travel Management portion of Alternative A, as continued, unaltered use of public lands has always been and remains important to me. The travel Management portion of Alternative A leaves "public lands" open for use. -In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. -In the final document for winter Travel Management I would like to see wording that guarantees documented roads are not included in BLM closures. Such wording would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Jack Hughes	There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives B-D.	See General Comment Response #33
Transportation and Access Including OHV	M.D. Hurwitz	I totally oppose Alternatives B, C, and D which are examples of runaway environmental extremism that is totally out of touch with reality. There is no proof of resource damage, or harm to animals, or the environment by snowmobiles and therefore snowmobiles must not be treated the same as OHVs. There must not be any restrictions on winter access routes to and within the Bears Ears District of Routt National Forest.	See General Comment Response #33
Transportation and Access Including OHV	Chris Hutt	Please include my support for endorsing Travel Management Plan 'A' to maintain public lands available for public use of their choice. There is little clear analysis documenting the effects of over the snow vehicles on public lands under the management of BLM and therefore extensive closures, as indicated in Travel Management Plans 'B' - 'C' and 'D', are not supported.	See General Comment Response #33
Transportation and Access Including OHV	Chris R. Hutt	Endorses Alternative A. Over the snow vehicles are not subject to causing land damage and should be considered and evaluated differently than off highway vehicles. There is little clear analysis documenting the effects of over the	See General Comment Response #33

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		snow vehicles on public lands under the management of BLM and therefore extensive closures, as indicated in Travel Management Plans ‘B’ ‘C’ and ‘D’, are not supported.	
Transportation and Access Including OHV	Michael S. Isenbarger	The Travel Management portion of Alternative A leaves public lands open for use. In the document of the Resource Management Plan Revision, Travel Management, there should never be any restrictions on winter access routes to or within the Bears Ears District of Routt National Forest. I know there is very little analysis stating the effects of snowmobiles on BLM land and its resources. All closures shouldn’t be as extensive as presented in the Travel Management Alternatives B-D. I feel that if the BLM is going to exclude snowmobiling they need to do a socio-economic analysis of OSVs. Finally for winter Travel Management I would like to see wording that guarantees that documented roads are not included in BLM closures. This would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Bill Karsell	I strongly oppose any alternative that would close significant tracts of public land to motorized recreation. As a member of the Northern Colorado Trailriders, I am committed to responsible use and volunteer maintenance of trails of public land. I much prefer negotiated partnerships with user groups to protect public land while permitting responsible use.	See General Comment Response #12
Transportation and Access Including OHV	Sheila Kaul	I would like to voice my opinion to keep our open BLM lands open as they should be. You need to consider the impact on the families of our state and our neighboring states that share our lands. So many families spend time together in our great outdoors and should not be penalized because they enjoy motorized actives. These activates also bring revenue to our state. I pay registration fees on all of my OHV vehicles, snow and dirt and would like to see some of these funds channeled to your Bureau to keep our public land open. Money is tight in all government as well as in our families, if we could learn to use what funds we have (OHV Registration) for all public lands Federal and State I think the Open land can stay open - or temporarily closed as need to "rest" periods as has been done in the past. There are enough public groups/clubs that teach responsible land use to their members as well as give of their members time to help keep trails open I believe that continuing in this direction can only keep us as citizens of our state involved and applaud all of our clubs and their members for their efforts.	See General Comment Response #12
Transportation and Access	Henry Keesling	The Executive Summary has not adequately informed the Public that the OHV play area, zone 1 and zone 2, and OPEN areas,	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning

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Including OHV		discussed in the document are two specific and separate on-the-ground projects.	of the Open OHV area category.
Transportation and Access Including OHV	Henry Keesling	The OHV play area will need an Activity Plan developed and presented in this document. OPEN areas proposed should be dropped as they will be used for 7 OHV play areas as well. There should be no OPEN areas designated in this RMP.	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Comprehensive travel planning will take place following approval of the RMP.
Transportation and Access Including OHV	Henry Keesling	p. 2-34: Alternative B: First, is this an OPEN area or an OHV play area. There seems to be confusion here as to what is being proposed for the areas in question. If the area is OPEN then anything can happen e.g., activities like the continued recreational bulldozing, drag line training, trash storage, whatever. However, if it is an OHV "play area" then LSFO can manage the area or that specific activity. Please clearly explain what the area is, OPEN or OHV play area. Like the continued recreational bulldozing, drag line training, trash storage, whatever. However, if it is an OHV "play area" then LSFO can manage the area or that specific activity. Please clearly explain what the area is, OPEN or OHV play area. Second, please state where the OPEN areas are located and provide maps. Note that the OPEN areas will be used as OHV areas. Further, state that OPEN areas will have no OHV management efforts. This needs to be made clear to the Public. Same impacts will occur be in both areas, OHV play areas and OPEN areas, but only the OHV area will have management. Impacts from proposed actions have to be completely presented. Please do this.	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Vehicle use in Open areas is subject to the standards in BLM Manuals 8341 and 8343. See definition of "Open" in the glossary.
Transportation and Access Including OHV	Henry Keesling	p. 2-183 and 2-184: In the Cedar Mountain Zone I Picnic area and Zone 2 Trail system, p. 2-184, please add in that there will be no hunting and no target shooting of any kind. Target shooting and hunting activities do not mix with the stated uses here. CDOW and BLM can manage the animals that take refuge in the area during hunting season.	The narrative description of the Preferred Alternative decisions on page 2-88 of the Draft RMP/EIS states that the "the discharge of firearms not associated with hunting would be prohibited" for Zone 1. It is not within BLM authority to prohibit hunting.
Transportation and Access Including OHV	Henry Keesling	p. 2-186, 2-187: South Sand Wash: See comments above. Zone 1. Suggest that the OHV open designation should read "...limited to existing numbered Moffat County roads and numbered BLM roads until the travel management plan, Activity Plan, NEPA EA, Section 106, and on-the-ground route designation and development is completed." Please note that the proposed OPEN designation should not be used. Proposed OPEN areas will be another OHV	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Vehicle use in Open areas is subject to the standards in BLM Manuals 8341 and 8343. See definition of "Open" in the glossary. Comprehensive travel planning will take place following approval of the RMP.

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		area with no management.	
Transportation and Access Including OHV	Henry Keesling	p. 2-188, 0-0 Zone 2: Suggest that the OHV OPEN designation, if used at all, should read "...limited to existing numbered Moffat County roads and numbered BLM roads until the travel management plan, Activity Plan, and NEPA' EA documents and on-the-ground route designation and infrastructure development is completed." Please note that the OPEN designation should not be used. What is proposed will become an OHV play area, and it will not be managed as an OHV play area. OPEN areas will have no management whatsoever.	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Vehicle use in Open areas is subject to the standards in BLM Manuals 8341 and 8343. See definition of "Open" in the glossary. Comprehensive travel planning will take place following approval of the RMP.
Transportation and Access Including OHV	Henry Keesling	p. 2-212 Open: There should not be any "open" areas in the LSFO management area. Alternative C should read that Zone 1 and 2 are being managed for OHV use. They are not being managed as "open". The ACTIVITY plans that are going to be developed are for "OHV use", not "open" use. Please change this throughout the document.	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category. Vehicle use in Open areas is subject to the standards in BLM Manuals 8341 and 8343. See definition of "Open" in the glossary. Comprehensive travel planning will take place following approval of the RMP.
Transportation and Access Including OHV	Henry Keesling	p. 2-225, Visual Resources, OHV Use, Alternative C: Does the acre figure for open (21,940 acres) represents the OPEN and OHV play area or the just OPEN areas. Please provide acre figure for each and a total acre figure. Please correct this throughout the document. Page 2-86 has an acre figure for, the OHV play area should that be included in this section as well?	The term "play area" has been removed from the RMP so as not to cause confusion with the meaning of the Open OHV area category.
Transportation and Access Including OHV	Henry Keesling	p. 4-175, 4-176, 4.4.3.3 Alternative C: Alternative C second paragraph, p. 4-175, 4-176: This paragraph should be read by all resource programs to understand what impacts will occur from this proposed action. Please list the "Natural resources important to OHV recreation" that will be protected. Please list those that would be not protected.	Impacts from OHV management to other resources can be found under each resources respective section in chapter 4. Natural resources important to OHV recreation are listed in Section 3.2.6.3 of the Draft RMP/EIS, which describes the existing conditions and characterizes OHV trends and use.
Transportation and Access Including OHV	Henry Keesling	p. 4-175,4-176: Is LSFO planning to open currently established ACECs and WSAs to OHVs after they have been impacted by route proliferation? How (see top of page 4-176) does doing this reduce conflicts and ensure that "...natural resources would receive enhanced protection"? What is the enhanced protection? Is LSFO unable to manage WSA boundaries with the legal mandates that are presently in place to protect these areas? Are there proposed new WSAs in this document that would allow this to happen? OHV use as a wilderness characteristic is an interesting concept. Is it LSFOs stated purpose here to create an ever expanding OHV play area and OPEN areas as route proliferation becomes an issue in adjacent and/or new areas? Explain how ever expanding route proliferation	See General Comment Response #11

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		and acquiescing to the impact will provide "enhanced protection" for natural resources.	
Transportation and Access Including OHV	Henry Keesling	The last sentence of the paragraph, page 4-176, seems to indicate that adaptive management will reduce impacts on OHV users while protecting natural resources important to all. Please explain how adaptive management will do this? Please detail in a narrative and cite the laws, regulations, and policy authorities that will be used to make this happen.	The adaptive management concept to address future transportation impacts in areas where OHV use would be limited to existing routes has been removed from the Proposed RMP/Final EIS. In its place, the revised chapter 2 notes that a collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. All areas that are either limited to designated roads and trails or existing roads and trails will have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. This transportation planning will be prioritized in areas more susceptible to impacts from proliferating OHV use. Some areas of the RMPPA have already undergone a route designation process, with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes.
Transportation and Access Including OHV	George Kostiuk	If there is a concern with snow machines destroying or harming this area, simply put in a rule similar to the USFS that states a certain depth of snow be present on the ground before operating a snowmobile is legal.	See General Comment Response #33
Transportation and Access Including OHV	Chad Kurtenbach	Thank you for the opportunity to comment. Overall I support the direction the BLM is trying to move with regards to the management of our public lands. As a hunter, ATV rider, and backcountry hiker I support responsible multiple use of these lands. A couple things I would like to see as the BLM moves forward are as follows: In regards to motorized travel I would like to see a change in wording from "established" to "designated". It seems like as technology improves the capabilities of OHVs there is new "routes" showing up everyplace and it does not take long for them to become established. In many places there is a trail on every finger ridge and in the bottom of every draw and countless trails connecting them. I	A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in limited Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Areas that are identified as limited in the RMP and do not have completed route designations will be managed as limited to existing routes until completion of Transportation Plans. This transportation planning will be prioritized such that

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		visit many of the same areas each year and find many of them becoming overrun with unmanaged OHV use and can see first hand the negative impacts it is having on wildlife, water (erosion), damage to the land in general, and increased amounts of trash and litter showing up. I do think motorized recreation is a legitimate use of public lands but I think it needs to be controlled to specific areas and specific, designated routes outside of those areas. I think it would be best if land managers had final say in which routes would be allowed and which would not. The wording "established route" seems to take that away and puts the final say in the hands of whoever pioneered the route to begin with. Another thing I would like to see along these lines are more areas greater than 5 square miles where motor vehicles are not allowed to give people who like to hike in to hunt or just hike an opportunity to get away from the motorized landscape.	the key habitat areas will be completed first. Concerning the suggestion for areas greater than 5 square miles where motor vehicles are not allowed, the Draft RMP/EIS already considers a range of alternatives that consider closure to areas larger than 3,200 acres (5 square miles). This includes several areas managed for wilderness characteristics under Alternative D.
Transportation and Access Including OHV	Chad Kurtenbach	The first is the parcel West of Yampa with the legal of T2N, R85W, section 18, and the other public lands in that area. There is a proliferation of unmanaged motorized routes that are being used year round causing disturbance to wildlife, play host to parties and littering, and are causing erosion. I would like to see most, if not all of these routes closed off to increase wildlife security in the area and keep some of the trash out of the area.	See General Comment Response #11
Transportation and Access Including OHV	Justin Lilly	Opposes Alternative C. This email is to express concern over the proposed action C by the BLM in the EIS prepared for the Little Snake RMP. It is my feeling that proper management of natural resources involves people from all groups; government, user groups, environmentalists, etc. With that in mind, the additional closure of more areas by the BLM seems unnecessary to me, seeing as user involvement in the management practices could be implemented instead. For example, alternative C proposes to close additional area to OHV users. Closing those areas completely would just make other trails and areas in that region subject to more travel and OHV traffic. Why not simply choose alternative A (no action) and instead, work on adopt-a-trail programs with local user groups and allow the users to maintain some 'ownership' of the trails and areas they frequent? Please take into consideration what alternative C would do. Closing areas is not always the best answer.	See General Comment Response #12
Transportation and Access Including OHV	Del Lockhart	I am very concerned about the RMP that is currently in process. It seems far too vague and open-ended leaving too much room for confusion down the road. It doesn't show me WHICH roads you want to close. For example, you don't seem to provide the research that elk are	Transportation decisions at the landscape level (RMP decisions) are limited to area designations (open, closed, limited). Any subsequent activity/implementation plan must comply with the goals, objectives, and decisions contained in the RMP. A collaborative transportation planning process

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		more adversely effected by motorized vehicles than they are by humans on foot. Experience has indicated to me just the opposite; not just for elk but deer and antelope as well. Wildlife often could care less about a motorized vehicle, but when you stop they go to yellow alert, but when you get out they go into red alert. It just seems to me that this idea (negative effects of motorized vehicles on wildlife) gets tossed out there as factual all the time and it's not always (or usually) true!	will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas "limited to designated roads and trails" have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. Some areas of the RMPPA have already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. Impacts from future route designation will be analyzed in the NEPA document(s) associated with those decisions.
Transportation and Access Including OHV	Del Lockhart	I have been enjoying this area since I was a young child when I camped and hunted with my Dad. For the last 40 years I've been enjoying it with my own sons and daughters (and still with my Dad--whose 86 yrs old!) Restricting public access (to PUBLIC lands) by closing roads discriminates against the elderly and the young families who cannot possibly access this territory on foot.	See General Comment Response #12
Transportation and Access Including OHV	Del Lockhart	I believe your plan closes Sand Wash which for decades has been enjoyed by all sorts of outdoor enthusiasts. Again, I respectfully ask; what is the justification? What is driving this push to close public lands?	The Draft RMP/EIS does not close the Sand Wash area to OHV use in any of the alternatives.
Transportation and Access Including OHV	Dale and Cheryl Martin	Just to address access in the Sand Wash basin as an example, the area will become more and more crowded each year and the number of near head on accidents our family has been subjected to in recent years will get more and more frequent as the years go by. It is only common sense that if you try to squeeze everyone down into a smaller area there will not only be much more damage to the environment due to harder use in that smaller area but there will be a huge increase in both serious injuries and probably a lot more deaths than already occur.	The comment is based on the incorrect assumption that existing use reflects existing management. Although the majority of the RMPPA is open to cross country use in Alternative A (No Action), most OHV use throughout the RMPPA, as well as in the South Sand Wash area, is self-limited to existing roads and trails. In Alternative C, no areas of South Sand Wash would be closed to OHV use, so the existing uses would not be precluded, therefore there would be little additional displacement into the designated open area.
Transportation	Penny McCoy	I endorse the Travel Management portion of Alternative A, as	See General Comment Response #33

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and Access Including OHV		continued, unaltered use of public lands has always been and remains important to me. The Travel Management portion of Alternative A leaves “public lands” open for use. In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. There is confusing analysis stating effects of OSV on BLM land and its resources. Therefore, closures should not be as extensive as presented in Travel Management Alternatives B-D.	
Transportation and Access Including OHV	Sam McLeod	I feel that this land should be available for all public use. Not all people are able to hike into public use lands because of age or disability. Should these people be denied public use? Please consider an alternative which would enable the continued use of the public resource for the entire public.	See General Comment Response #12
Transportation and Access Including OHV	Ray and Karin Melhuish	Please keep the current off road access as it is. It is a right of off roaders and a viable industry to the state (i.e., vehicle sales, repairs, motel stays, restaurants, grocery stores).	Transportation decisions at the landscape level (RMP decisions) are limited to area designations (open, closed, limited). Any subsequent activity/implementation plan must comply with the goals, objectives, and decisions contained in the RMP. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in "limited to designated roads and trails" Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision that identify designated routes. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing roads and trails until completion of Transportation Plans. Some areas of the RMPPA have already undergone a route designation process (such as the Emerald Mountain SRMA), with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. The economic impact of OHV use is addressed in chapter 4 of the Draft RMP/EIS. Impacts from future route designation will be analyzed in the NEPA document(s) associated with those decisions.

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Transportation and Access Including OHV	A. Metcalf	Of the alternatives proposed, Alternative D comes closest (but to my mind still falls short of truly protecting the area - there should be no motorized recreation permitted).	See General Comment Response #11
Transportation and Access Including OHV	Moffat County Commissioners	p. ES-15 Transportation and Access and Travel Management 1) Moffat County supports the "rerouting roads and trails where landlocked by private parcels" to provide access to federal lands. We request this language be added to p. 2-103 Goal A. However in the same paragraph there is reference to closing routes and 'restricting access to meet resource objectives'. It is appropriate for BLM to add to this sentence "where RS 2477 rights of way are not impacted." The point is that BLM does not single-handedly have authority to close or restrict access on RS 2477 routes unless agreed to by the claimants. For all the recognition of RS 2477 routes BLM gave on page ES 3, this section takes them away.	RS 2477 assertions are addressed through the 2006 Departmental Policy, which brings Departmental policy in line with the Tenth Circuit Court of Appeals ruling in Southern Utah Wilderness Alliance v. Bureau of Land Management, 425 F.3d 735 (10th Cir. 2005), as well as subsequent BLM policies implementing the Secretary's memorandum of March 22, 2006. While the presence of RS 2477 claims may be taken into consideration during the planning process, non-binding determinations are to be identified and made on a case-by-case basis during implementation of the RMP. As the SUWA v. BLM court notes, ultimately deciding who holds legal title to an RS 2477 right of way "is a judicial, not an executive, function." 425 F.3d at 742.
Transportation and Access Including OHV	Moffat County Commissioners	2) Moffat County has listened to several Off Highway Vehicle users concerned about how 'existing' trail is defined. The point of concern is a fear of getting a ticket by the BLM Ranger for being on a route where an argument happens regarding whether it is 'existing' or not. We request the BLM agree on a definition with the OHV community on what defines and 'existing' route and incorporate it into this section as well as the Travel Management section on p. 2-103.	Legal cases, such as SUWA v. BLM (case 04-4071 & 04-4073), addressed the legal definition of a road. Further, IM-2006-173 and Technical Note 422 address BLM's terminology used for referencing route nomenclature. The Proposed RMP/Final EIS has been modified to clarify the terminology used. Subsequent implementation-level travel planning will address the designation of specific routes using the direction from Technical Note 422.
Transportation and Access Including OHV	Moffat County Commissioners	p. 2-103 Goal A-Travel Management 1) Moffat County has listened to several Off Highway Vehicle users concerned about how 'existing' trail is defined. The point of concern is a fear of getting a ticket by the BLM Ranger for being on a route where an argument happens regarding whether it is 'existing' or not. We request the BLM agree on a definition with the OHV community on what defines and 'existing' route and incorporate it into this section as well as the executive summary on p. ES-3.	Legal cases, such as SUWA v. BLM (case 04-4071 & 04-4073), addressed the legal definition of a road. Further, IM-2006-173 and Technical Note 422 address BLM's terminology used for referencing route nomenclature. The Proposed RMP/Final EIS has been modified to clarify the terminology used. Subsequent implementation-level travel planning will address the designation of specific routes using the direction from Technical Note 422.
Transportation and Access Including OHV	Moffat County Commissioners	3) Moffat County requests the same language on p. ES-15 regarding creating public access routes to landlocked BLM grounds be inserted in Goal A.	The language noted by the commenter is already contained in chapter 2 of the Draft RMP/EIS on page 2-104. As this type of language is already contained as a guiding principle for future transportation management activities, there is no need to add it as

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			part of the goal.
Transportation and Access Including OHV	Moffat County Commissioners	4) Moffat County supports the concerns of the Timberline Trail Riders and the comments submitted by David Bray regarding Over the Snow Vehicle restrictions. Highlights of these comments that Moffat County requests BLM modify its Draft RMP include: 1) OSV needs to be identified as a planning issue and an existing use of federal lands in Chapter 3. 2) BLM did not address any impacts that would be reduced by OSV closures, nor has BLM addressed any issues that OSV use creates. 3) Social and Economic Impacts have not been analyzed regarding closures to OSV use.	See General Comment Response #33
Transportation and Access Including OHV	Moffat County Commissioners	p. 2-105 Continued Travel Management Table. Moffat County adamantly opposes the 'closed to over-the-snow vehicle designations.' The RMP does not discuss logic behind this proposal and it was never discussed with the public nor the Snowmobile community prior to the RMP. The closures they would limit access to Black Mountain and other areas. Over snow vehicles are not a ground disturbing activity nor interfere with sage-grouse nesting or brood rearing. Impacts to big game winter range are virtually non-existent due to most of the over snow travel being in high country. Moffat County requests the Over Snow Restrictions be removed from the RMP.	See General Comment Response #33
Transportation and Access Including OHV	Moffat County Commissioners	p. 2-104 Travel Management and p. 2-106 Limited to Designated Roads and Trails- Moffat County adamantly requests both sections add a statement that clarifies that areas are classified for travel on 'existing' trails until such time Travel Management Plans 'designate' routes. This seems to be a confusing issue amongst the public, and clarification as to this point might ease general concerns.	See General Comment Response #10
Transportation and Access Including OHV	Moffat County Commissioners	p. 3-124, Table 2-36 Travel Management Designations It appears Table 3-36 is a table of "proposed travel management designations" in this RMP rather than a table representing "current travel management designations." Please check to verify the data within the table correct.	This table correctly describes the existing travel management designations.
Transportation and Access Including OHV	Moffat County Commissioners	p. 4-196-199 Alternative A, B, C, and D – Travel Management: 1) Moffat County request that rather than solely identifying the maps which show the RS 2477 routes that are being ignored with BLM Closures, that BLM describe the impacts from these closures, both positive and negative. 2) Moffat County requests that in each of the Alternatives, rather	See General Comment Response #33

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		than BLM simply stating the facts about how much BLM ground is being closed to over the snow traffic, we request BLM identify the impacts to the users of this decision, even if it is better placed in the Social Economic Impact Analysis Section.	
Transportation and Access Including OHV	Brad Moore	There should be no restrictions on winter access routes to or within the Bears Ears District of Routt National Forest in the Final Document of the Resource Management Plan Revision, Travel Management section.	See General Comment Response #33
Transportation and Access Including OHV	Brad Moore	I would like to see wording that guarantees documented roads are not included in BLM closures in the final document for winter Travel Management. As it is written now, confusion for winter recreation participants exists. Guarantees that documented roads are not included in BLM closures would alleviate the current confusion.	See General Comment Response #10
Transportation and Access Including OHV	Brad Moore	The effects of Over Snow Vehicles on BLM land and its resources are based on insufficient collection and confusing analysis of data. Closure of public land managed by the BLM should not be as extensive as presented in Travel Management Alternatives B – D. If the BLM is going to exclude snowmobiling from public lands then collection and analysis of data concerning the socio-economic impact of Over Snow Vehicles has to be addressed.	See General Comment Response #33
Transportation and Access Including OHV	David & Tresa Moulton	Improve off-road vehicle management by establishing a designated route system for the entire LSRA. It should also eliminate or significantly reduce the size of the proposed Sand Wash unrestricted motorized off-road vehicle "play" area. Remember, these vehicle tracks will NOT disappear.	See General Comment Response #10
Transportation and Access Including OHV	Mike Nelson	I would like to add my input on the new BLM travel management proposal that is being discussed right now. I am an active OHV rider and trail advocate, and I see closing trails and access to trails as a growing concern in regard to safety and the general well being of outdoor recreation. The trend today appears to be for OHV accessible lands to be closed, while the number of OHV users is on the increase. I would also like to add that there is a lot of tourism in the Northern Colorado area which is driven by OHV use. Limiting access to these lands only increases the use for each trail which accelerates any trail deterioration and necessary maintenance. The resulting density also raises serious safety issues, which I have witnessed firsthand, as more riders crowd in smaller areas. Some of the more popular areas are already getting reputations for being unsafe due to the increasing amount of riders.	See General Comment Response #12
Transportation	Zane Olsen	I don't see any wording that clarifies the difference between OHV	See General Comment Response #33

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and Access Including OHV		and OSV? Also there seems to be nothing in print about keeping access thru BLM on existing county roads open? My preference therefore would be to use Alt. A of the plan.	
Transportation and Access Including OHV	Richard Ott	There is little analysis stating effects of snowmobiles on BLM land and its resources. Therefore, the OSV should not be restricted at this time.	See General Comment Response #33
Transportation and Access Including OHV	Shawn Peterson	As an OHV user, I am greatly concerned about the density impact on riding areas as more and more public land is closed to OHV use. The dangers are heightened, and the overall experience in nature is severely diminished when too many riders are forced into too few OHV areas.	See General Comment Response #12
Transportation and Access Including OHV	Teresa Pollard	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Jim & Liz Robinson	BLM should require ORVs to stay on designated routes. BLM should systematically identify suitable ORV routes and should close all existing ORV routes that enter critical wildlife habitat or riparian zones, or that are too vulnerable to erosion from growing ORV traffic. The health of the land and wildlife must come first.	See General Comment Response #11
Transportation and Access Including OHV	Rebecca Rolando	My letter is in Support of Alternative A. By doing so this leaves our public lands for use by all citizens. There should be no restrictions on winter/summer access routes to/within the Bears Ears District of the Routt National Forest. If any other alternative plans are chosen they will effect ATV and snowmobile recreational use. By putting these groups in smaller areas it increases the impact on those smaller parcels. And by having less areas to ride this would require more BLM officers to patrol public lands to enforce all the new restrictions. In turn this would cost more tax payer money.	This RMP/EIS process only considers management decisions on BLM-administered lands, not on lands administered by the National Forest. Additionally, BLM's legal mandate is to manage lands for multiple uses. The term "multiple use" as defined in FLPMA means "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people." This direction does not require that all uses be accommodated in all areas, but that certain areas can be managed for a given resource, where another area may be managed for a given use. The commenter presents no evidence that increasing limitations on a use with very few existing limitations will result in a significant increase in use in the remaining areas open to cross country OHV use. BLM's analysis, as presented in chapter 4, does not support such a conclusion. Enforcement of RMP decisions and agency budgets are not RMP-level decisions.

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Transportation and Access Including OHV	Matthew Roman	I support the establishment of a designated route system for ORVs and the elimination of the proposed Sand Wash unrestricted ORV area.	See General Comment Response #10
Transportation and Access Including OHV	Edward Russell	In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on access routes to/within the Bears Ears District of Routt National Forest. I would like to see wording that guarantees documented roads are not included in BLM closures. Shutting down access to public lands does nothing to encourage people to use and enjoy nature and the programs of the Bureau of Land Management.	See General Comment Response #12
Transportation and Access Including OHV	Ana Salinas	3) create a designated route system for the entire Area for off-road vehicle use	See General Comment Response #10
Transportation and Access Including OHV	Scott Scherer	I endorse travel mgmt. alternative A. We should keep the use of public lands open for use. It is important to me that this remains in place. I also believe there shall be no restrictions in winter access to the Bears Ears district of Routt National Forest. To add there appears to be little if any analysis regarding Over Snow Vehicles on BLM Land, therefore closures regarding TMA B-D should be accessed further. In my experience when snowmobiling if we see any wildlife (very seldom) we have not disturbed them at all. They remain where they are and are still there when we return. Therefore if you (BLM) wish to include OSVs there needs to be substantial evidence providing such disturbance to wildlife. I am and my family are avid snowmachine riders and enjoy the public lands available to us. I endorse Alternative "A".	See General Comment Response #33
Transportation and Access Including OHV	Karen Sewell	It appears to me that Alternative A is the most logical solution. The area in NW Routt County has adequate closures. There needs to be snowmachine access as many of the land owners in the area have property on both sides of the proposed closures and need to be able to access it year round and snowmobiles are the only feasible ways.	See General Comment Response #33
Transportation and Access Including OHV	Snowmobile Alliance of Western States	The proposed OSV closures in the preferred Alternative C are absolutely unnecessary and unwarranted. OSVs, or snowmobiles as I prefer to refer to them, do not harm the environment or disturb wildlife, and should not be treated the same as OHVs. Snowmobilers and wildlife can and do co-exist all across the northern portions of the United States and Canada. Proper management does not need to include further snowmobile restrictions on these BLM managed lands. There are NO proven facts that show that wildlife are disturbed more by snowmobilers	See General Comment Response #33

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		than they are by non-motorized recreation, and in fact, there are numerous studies that have shown just the opposite to be true. These Studies have shown that ungulates “fear flight” much more often when surprised by non-motorized recreationists than they do when snowmobilers are present. With snowmobiles, wildlife can hear you coming and are not startled by their sudden presence. Any areas that may end up be designated off limits to snowmobile use, must also be closed to non-motorized recreation.	
Transportation and Access Including OHV	John Spezia	The ORV users have over a million acres of area to impact. Nothing is being taken away from them. The criteria for any activity should give high priority to resource damage and protection not who has the most influence or numbers. The BLM's job is to protect the land first and second, to allow human activities that do not degrade the land, wildlife, the water, the air and other user's recreation. All ORVs should stay on trails, the trails that are open should say that, if there is no sign it is closed. And, if there are play areas, they should be small, not cause off site problems and enforced.	See General Comment Response #11
Transportation and Access Including OHV	William K. Spicer	I endorse the Travel Management portion of Alternative A, to maintain "public lands" open for use. I have traveled by snowmobile all over the area for 37 years. I have not seen that snowmobiles are impacting the land. Also, at my age -72- I cannot walk very far and a snowmobile allows me to enjoy our public lands all winter. I accrued 1200 miles on my snowmobile during the winter of 06-07. In the Final Document of the Resource Management Plan, Travel Management, there should be no winter restrictions on routes accessing the Bears Ears District of Routt National Forest or travel within the Bears Ears District. It should be stated "clearly" that any dedicated roads are not included in BLM closures. When are you going to show definite, clear analysis that snowmobiles harm BLM resources? Some planned closures "to safe guard wildlife winter range" is bogus as they are not wildlife winter range.	See General Comment Response #33
Transportation and Access Including OHV	Annie Steele	Off road vehicles are a danger to children and the environment. I am speaking as a resident of the Pismo Beach state Park area where those vehicles are/ and come on the weekends by the millions. There is possible contamination by e-coli bacteria from septic discharge into the ground, as well as the motor oils and other waste discharged by the off-roaders.	See General Comment Response #11
Transportation and Access Including OHV	Robert Steele	Alternates C and D in the Little Snake Resource area are far too restrictive to allow the full concept of multiple use to be effective for the citizens. I object to: You currently have the authority to close especially sensitive areas to excessive OHV use and you should	See General Comment Response #12

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		utilize this authority rather than have preplanned restrictions.	
Transportation and Access Including OHV	Brad Steffens	I would like to comment on the new BLM travel management proposal which is on the table right now. I am an active OHV rider and trail advocate, and I see closing trails and access to trails for OHV as a growing concern for safety reasons. The recent trends are for OHV accessible lands to be closed, while the number of OHV users is growing. There is also a lot of tourism in the Northern Colorado area which is driven by OHV use. Limiting the access to these lands only increases the use for each trail which accelerates any trail deterioration and necessary maintenance. The resulting density also raises serious safety issues as more riders crowd in smaller areas. A few of the more popular areas are already getting reputations for being unsafe simply due to rider numbers.	See General Comment Response #12
Transportation and Access Including OHV	Ralph E. Stewart	To Whom it May Concern, I understand that the plan is to close almost all BLM land in western Moffat County to over the snow vehicles. Having ridden a lot of this area I do not want to lose this privilege. When there is enough snow to ride I have never seen any damage to the land. I also did not see any where in your documents where there was any study of the effects of over the snow vehicles. I also ride ATVs in western Moffat County and your preferred alternative C states that in most areas travel will be restricted to existing roads and trails. How will it be determined what is considered as an existing road or trail? That is not addressed in the plan. Will it be up to the person working that area to decide what trails and roads will be considered existing and therefore left open. I do believe these areas need to be managed, but remain open to all users. I did not see any reference in the plan to any study of the impact to Craig and Moffat County if alternative C is chosen. Is that not a part of what these plans are to do? There is no doubt that the restrictions would have a significant economic impact. For these reasons I believe alternative A to be the best choice.	See General Comment Response #33
Transportation and Access Including OHV	Kent Sundgren	I urge you to reconsider and implement alternative B. We need more access for more citizens, not closures. Especially closures that are strategically placed so as to restrict access to multiple use recreationalist. We need more trails to disperse users, not fewer and in concentrated areas, thus causing more opportunity for conflict.	The comment is based on the incorrect assumption that existing use reflects existing management. Although the majority of the RMPPA is open to cross country use in Alternative A (No Action), most OHV use throughout the RMPPA is self-limited to existing roads and trails. As such, the change in Alternatives C and D from open to cross country OHV use to limiting OHVs to existing (until transportation planning occurs) or designated routes will not concentrate OHV use, as the commenter contends. OHV use is one of the multiple uses BLM is required

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			to manage for, and limiting OHV use to existing and designated routes is a way to ensure that such a use can continue while protecting other resources and land uses.
Transportation and Access Including OHV	Boyd Tallent	I would like to see the Travel Management portion of Alternative A left like it is, with no change in present management plan. This I endorse. As an outfitter & permitted on BLM Lands, one of my main concerns is, big game hunting. I have seen area where the public could hunt but was not allowed OHV to pack out their kill, and so there has been times where I found game killed way back from any road, and the hunter only packed out what he could carry. The rest would be left because he or they had no way to haul out all the meat. Hunters will walk a long way to hunt, but after the kill, some of the hunters don't want to do all the work of getting out kill or all of the kill if they have to carry it out. I know we have laws on getting out all of the kill, but also know how some people are. My comment is that we must or BLM should MAKE SURE that the hunter has a way to get in and out with kill all of it & everything they take in with them, back out to their auto.	See General Comment Response #12
Transportation and Access Including OHV	The City Council of Steamboat Springs	Travel Management: Off-Highway Vehicle (OHV) Designations: The RMP recognizes that almost one million acres are currently open to OHV use without constraints and has resulted in substantial resource damage and habitat fragmentation. Alternative C would designate OHV "cross-country" use only at the Sand Wash Special Recreation Area (21,940 acres) and allow OHV use on existing roads and routes (1,039,500 acres) and on designated roads and routes (203,100 acres). This element is confusing. We urge clarification of the Travel Management Element, including a Travel Inventory and development of a designated route system and management plan for the RMP area. We urge consideration, planning, and management for the sustainability of the Sand Wash Special Recreation Area. Additionally, we support the BLM objective to complete motorized route designations for special management areas that are not closed to motorized vehicular use.	See General Comment Response #10
Transportation and Access Including OHV	Timberline Trailriders, Inc.	We are, however, concerned about the 203,100 acres designated as limited to designated routes as we wonder when, if ever, routes will ever be designated in these areas. Slowness in designating routes can create de facto non-motorized area while the original intent is otherwise. The preferred manner is as you've done on the bulk of the lands by designating travel to existing routes now and address designation issues in the Travel Management Plan. We note your indication that your intent is manage these areas as limited to	See General Comment Response #10

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		existing routes initially but feel the RMP should be changed to the existing route limitation, understanding that with Travel Management, the designation would shift to designated routes.	
Transportation and Access Including OHV	Timberline Trailriders, Inc.	Over the snow motorized: We are confused by the large areas proposed to be closed to over the snow vehicles. The areas to the east near Black Mountain can have a sustainable snow cover that would protect natural resources and some of these areas are critical in providing snow access to Forest Service lands. The lands to west have generally not had snow cover sufficient to encourage snowmobile use in the past. There is no reason to ban their use as there could be occasions when adequate snow cover persists to provide motorized recreation opportunities in the winter. Your proposal would also prohibit grazing permittees and the mineral extraction users from utilizing a snow machine when that means of transportation would clearly provide the least resource damage (over the snow instead of plowing it). A little common sense should prevail in dropping this restriction.	See General Comment Response #33
Transportation and Access Including OHV	Jenn Tonso	Upon briefly discussing the 1/4th mile radius for sage grouse with Jeremy Casterson, on 4/06/07, I learned that motorized vehicles traveling through elk and deer areas do not have negative effects. If the elk and deer move at all they move away a few hundred feet or yards and soon return. I have also noticed elk and deer will vacate greater distances in areas I walk through and do not always return. Motorized travel does not have the scatter-and-leave effect, as does human non-motorized travel through an area.	See General Comment Response #12
Transportation and Access Including OHV	Jenn Tonso	In comparing you wildlife map 3-11, Elk Distribution-Winter, with the areas where snowmobiling would be restricted or not allowed map 2-47, Off-Highway Vehicle Use-Alternative C and map 2-48, Off-Highway Vehicle Use - Alternative D, I notice you show wildlife being in the areas where snowmobiles can presently spread out and ride freely, some shown within the Forest Service Management. These areas are mostly at higher altitudes where elk and deer don't winter. The wintering areas of elk and deer, that are corridors for snowmobilers to get into the high country specifically within the Black Mountain areas North of Highway 13, are "groomed corridors" in which snowmobilers do not typically go off the trail as it goes through private property or in on a county road. Elk and deer are sometimes seen in the lower areas. Snowmobiles do not cause distress or harassment, as evidenced by the elk and deer continuing their winter grounds in the lower areas through which snowmobiles travel. The blanket statement that OSVs chase deer and elk is false.	See General Comment Response #33

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		You can't chase or harass what is not in the high country.	
Transportation and Access Including OHV	Jenn Tonso	There is also a concern with information shown on map 2-47 and map 2-48, being Off-Highway Vehicle Use for Alternative C and Alternative D respectively. The maps show large areas closed to OSV. In particular, areas frequented by snowmobilers, where riding generally occurs in the higher altitudes, the Black Mountain, Douglas Mountain, and Indian Run areas, huge areas West of Highway 13 which are lower altitude areas are also closed to OSV. These lower areas are not always rideable to OSV due to lack of snow. However, when snow depth allows, many OSV riders do use these areas, with no OSV restrictions for areas presently used by OSV.	See General Comment Response #33
Transportation and Access Including OHV	Joseph Tonso	4. Alternative B, C and D are all incomplete. The so-called designated trails and existing roads are not specified in the document. In effect, if any of these alternatives are adopted, the motorized recreation is left at the mercy of the BLM to say where one can travel, with no input from the users. Without prior designation the area could become an area with no routes or trails available. 5. The areas closed to OSV use are self-limiting by snow conditions. To use wildlife habitat as a reason for closure to OSV or OHV is absurd. In all my 60 plus years as a recreationist, hunter and outdoorsman, I am aware of the human factor on wildlife, apparently your person writing the observation is not. An OSV or OHV moving through game inhabited areas merely causes the wildlife to move away and continue doing whatever they were doing, but let a non-motorized human form appear and the wildlife will clear the area. I do not see this as rationale or as a part of this study. 6. In the consequences section of the EIS for Impact on Recreation, OSV is not mentioned one time. If there are no consequences for OSV use, there can be no closure of the mapped areas of Moffat and Routt counties to OSV. 7. Since the BLM has no winter plan for OSV, OSV should not have been included in this plan, as pointed out by the BLM at the first organizational meeting some two years ago.	See General Comment Response #33
Transportation and Access Including OHV	Tri-State Generation and Transmission Association, Inc.	2.6.6 Transportation and Access and Travel Management This paragraph contains the following sentences: Federal regulations (43 CFR Part 8340) and BLM planning guidance require the BLM to designate all BLM administered land as either open, limited, or closed in regard to OHV use. Until specific designations are put in place, all motorized vehicle use on BLM administered lands would be limited to existing legal routs of travel until route designation	Legal cases, such as SUWA v. BLM (case 04-4071 and 04-4073), addressed the legal definition of a road. Further, IM-2006-173 and Technical Note 422 address BLM's terminology used for referencing route nomenclature. The Proposed RMP/Final EIS has been modified to clarify the terminology used. Subsequent implementation-level travel planning will

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		decisions are completed through activity plans or amendments to this plan. Areas designated as limited to designated routes will be managed as limited to existing routes until transportation planning and route designation occurs. Please define the term existing legal routes of travel, or consider using another term. It is not in the glossary nor appendices, and could mean existing roads and trails or have other meanings.	address the designation of specific routes using the direction from Technical Note 422.
Transportation and Access Including OHV	Tri-State Generation and Transmission Association, Inc.	2.6.6.1 Resource Use Goals and Objectives Under Goal A, add a bullet for BLM to develop and include a detailed priority listing of the areas in the Approved RMP/ROD for the RMPPA, for comprehensive transportation planning, with a timetable that is tied to BLM budget priorities. The need for adequate access everywhere in the RMPPA is paramount for the coming years. We also suggest that the appropriate subsections of section 2.6.6.2 also be revised, to include the priority list for each alternative	A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the Record of Decision. Colorado State BLM policy requires that all areas in limited Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP Record of Decision which identify designated routes. Areas that are identified as limited in the RMP and do not have completed route designations will be managed as limited to existing routes until completion of Transportation Plans. This transportation planning will be prioritized such that the key habitat areas will be completed first. This prioritization can be found in Appendix F.
Transportation and Access Including OHV	Dwight J. Tronson	Having read the proposed changes to the Little Snake Resource Management Plan I would like to put in my desire for plan 'B', opening ALL BLM land to Off Highway Vehicles. As an OHV user I realize that this is a difficult decision to make. You'll obviously get flack regardless of any revisions to the existing plan. If we do not open additional new areas to legitimate OHV use we will be squeezing more and more users into a smaller and smaller area which will result in overuse and the accompanying damage to the area. If you are prevented from instituting plan B please leave the existing usage areas alone. We don't wish to damage the environment but we will not be corralled into seeing the vast majority of land in the state being used for the pleasure of less than a thousand legitimate back country hikers and campers.	See General Comment Response #12
Transportation and Access Including OHV	Chuck Vale	I would like to support the travel management portion of Alternative A. I would like to continue to use public lands for my recreational use as I have in the past. I believe that the travel management portion of Alternative A leaves Public lands open for use. I also believe that in the final plan revision, there should be no restrictions on winter access to or within the Bears Ears District of the Routt National Forest.	See General Comment Response #33

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Transportation and Access Including OHV	Jon Wade	I support the Travel Management portion of Alternative A, because continued unaltered use of public lands is very important to my family and I. This alternative will leave most of these public lands open for our use. OSVs do not touch the land, and therefore cause no damage. They should not be treated the same as OHVs, which are restricted to roads and trails for a reason. Further, there should be no restrictions on winter access routes to and within the Bears Ears District of the Routt National Forest. The analysis of the effects of OSVs on BLM land is minimal, and what you have is confusing. Further, there is no socio-economic analysis of OSVs. I would like to see wording in the Travel Management portion that guarantees documented roads are not included in any BLM closure. Such wording would alleviate confusion for winter recreation participants.	See General Comment Response #33
Transportation and Access Including OHV	Michael Wandzek	I would like to comment on the new BLM travel management proposal which is on the table right now. I am an active OHV rider and trail advocate, and I see closing trails and access to trails for OHVs as a growing concern for safety reasons. The recent trends are for OHV accessible lands to be closed, while the number of OHV users is growing. There is also a lot of tourism in the Northern Colorado area which is driven by OHV use. Limiting the access to these lands only increases the use for each trail which accelerates any trail deterioration and necessary maintenance. The resulting density also raises serious safety issues as more riders crowd in smaller areas. A few of the more popular areas are already getting reputations for being unsafe simply due to rider numbers. Please consider not only these safety factors when making your decision, but also the accelerated trail deterioration that is created by taking away our riding areas and forcing the over population of limited trail access to OHV enthusiast. I would like to vote in favor of at least keeping what is currently open - and ultimately opening more land to OHV use in the future. Taking away what little OHV availability we have now will only increase the problems later.	See General Comment Response #12
Transportation and Access Including OHV	Dave Watson	My family, friends, and I have ridden in the Black Mountain, Freeman, and many other areas that is affected by the Impact Statement for 30 plus years. If snowmobiling and OHV is not allowed in these areas it will cause a problem with our winter and summer recreation. There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. For that reason,	See General Comment Response #33

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		closure(s) should not be as extensive as presented in Travel Management Alternatives B, C & D. There is no socio-economic analysis of OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling. In the final document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. In this Travel Management I would like to see wording that would guarantee documented roads are not included in BLM closures. Such wording would stop the confusion for winter recreation participants.	
Transportation and Access Including OHV	Linda Watson	My family and I are extremely concerned that the Draft EIS did not properly analyze the needs and effects if snowmobiling in the area of the Little Snake Resource Management Plan. We have snowmobiled in these areas (Black Mountain, Freeman, Wilderness Ranch, Beaver Creek, Indian Run and Browns Park) for 30 years and we do not want it taken away. We do not impact these areas with our snowmobiles, because we are on the snow not on the ground. After reading the Draft Environmental Impact Statement I find there is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in the Travel Management Alternatives B-D. There is bi socio-economic analysis if OSV. This analysis has to be addressed if the BLM is going to exclude snowmobiling.	See General Comment Response #33
Transportation and Access Including OHV	Linda Watson	Alternative C of the Little Snake RMP closes too many trails used by snowmobilers.	The Draft RMP/EIS does not close any specific trails. Transportation decisions are limited to area designations. Additionally, the Proposed RMP/Final EIS has been revised to include added analysis of the impacts from OSV management decisions. Chapter 2 OSV management decisions have also been revised in the Proposed RMP/Final EIS.
Transportation and Access Including OHV	Linda Watson	In the last document of the Resource Management Plan Revision Travel Management of the Little Snake Resource Area, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest.	The Bears Ears District portion of the planning area is managed by the USFS and is outside of BLM jurisdiction.
Transportation and Access Including OHV	Linda Watson	In the final document for winter travel management of the RMP for the Little Snake I would like to see wording that guarantees documented roads are not included in the BLM closures. That wording would alleviate confusion for winter recreation participants.	BLM re-examined OSV use and its impacts. BLM still has concerns that OSV travel could disturb animals during critical time periods (winter months). However, when snow depth reaches a certain depth, (a depth at which OSV can travel in the area) wildlife typically

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			moves to other areas. Therefore, BLM has changed the decision to accommodate both OSV use and protect wintering wildlife for the Proposed RMP: The new decision for Alternative C/Proposed RMP will be to allow over-the-snow vehicles only in areas where snow depth is equal to or greater than 2 feet. If snow depth is lower than 2 feet, over-the-snow travel will not be allowed on BLM-managed surface, except for permitted and administrative uses. If winter conditions warrant, BLM would temporarily close areas to over-the-snow vehicles in order to reduce stress to wildlife. OSV would only be permitted on designated routes in the non-recommended WSAs. BLM OSV restrictions do not apply to valid existing routes, including county roads, permitted uses and administrative uses.
Transportation and Access Including OHV	Randy Watson	There is little and confusing analysis stating effects of OSV "Over Snow Vehicles" on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives B-D. I do not support Alternatives B-C or D. Because I think they are too restrictive. In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restriction on winter access routes to/within the Bear Ears District of Route National Forest.	See General Comment Response #33
Transportation and Access Including OHV	Richard Watts	I also ask the BLM to remove all existing restrictions on land use in the Little Snake area, to the fullest extent possible under the existing laws which govern BLM's decisions. I request that in removing each restriction, the BLM not implement any language to the effect that "BLM may apply COA's [conditions of approval] on a case-by-case basis based on site-specific analysis prior to authorization." I ask that the restrictions on land usage be removed, but I ask also that BLM not establish or retain any policy that gives BLM any moment-to-moment or arbitrary say so over what conditions may be imposed on land usage, on a case-by-case basis. Nor on any other basis, but especially not on such an arbitrary, sweeping basis as "case-by-case." It is public land, and the public has a right to use it - without asking permission.	See General Comment Response #12
Transportation and Access Including OHV	Richard Watts	However, on those points of the plan, if any, in which the BLM is bound by law to restrict land use, or to impose conditions on land use, I request that the BLM state those restrictions or conditions right up front in the final draft of the Little Snake Resource	See General Comment Response #12

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		Management Plan. I request this in order that for each area of land in the Little Snake RMPPA, anyone can clearly know by reading the plan, which uses are allowed and which uses which are forbidden, and in order that BLM not create a policy whereby arbitrary and capricious denials or controls can later be imposed on land usage. So that BLM does not give itself any power to deny or forbid any usage that the new RMP does not specifically deny/forbid, nor to restrict or place conditions on any usage other than the restrictions/conditions specifically imposed by the new RMP. In other words, if a particular land usage is permitted under the new RMP, I ask that the RMP be worded in a way that gives citizens the legal right to use the land in that way, with BLM retaining no option to deny that usage. I reject Alternative B for this reason, and because on some points it does impose additional restrictions on land use, and/ or increased government activity in the Little Snake River area, all of which I feel are unnecessary and damaging to the interests of citizens. For the same reasons, I reject alternatives C and D.	
Transportation and Access Including OHV	Denette Webber	I am an OSV and OHV owner/user and I endorse the Travel Management portion of Alternative A, as continued, unaltered use of public lands has always been and remains important to me. The Travel Management portion of Alternative A leaves “public lands” open for use. Also in the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives B-D.	See General Comment Response #33
Transportation and Access Including OHV	W. Alan Webber	The Travel Management portion of Alternative A leaves “public lands” open for use. Also in the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. There is little and confusing analysis stating effects of OSV (Over Snow Vehicles) on BLM land and its resources. Therefore, closure(s) should not be as extensive as presented in Travel Management Alternatives B-D.	See General Comment Response #33
Transportation and Access Including OHV	Deb & Tom Weiland	We support Alternative "A". Winter recreation remains the same for Moffat County and NW Routt County. The Travel Management portion of Alt. "A" leaves Public Lands open for use. Also, there should be no restrictions on winter access routes to/within the Bears	See General Comment Response #33

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		Ears District of Routt National Forest in any Alternative chosen.	
Transportation and Access Including OHV	Deb & Tom Weiland	Documented roads should not be included in BLM closures. The closures in Travel Mgmt. Alts. B-D are too extensive.	See General Comment Response #10
Transportation and Access Including OHV	Deb & Tom Weiland	There is little data stating effects of over snow vehicles on BLM land.	See General Comment Response #33
Transportation and Access Including OHV	Western Watersheds Project	You should address the now accepted issue of human induced global warming by phasing out the use of off-road vehicles in the Little Snake Resource Area beginning with complete closure of ACECs, WSAs, special habitat areas immediately, and over the planning period for the remainder of the area. Only licensed vehicles should be allowed on main roads and play areas such as Sand Wash should be immediately closed and allowed to begin recovering. George Bush has accepted that global warming is real and human induced and called for conservation. The Little Snake FO should do the same. These “toys” are destructive to habitat, increase our dependence on foreign oil, and cause air and water pollution, which you have not addressed. Studies have shown that off-road vehicle users generally ignore rules and violate laws. Utah State University studies have shown that 40% of users admitted going off legal routes in their last ride. It is time to draw a line and shut down these users.	Resource impacts, including those to air and water, resulting from OHV travel are disclosed in the Draft RMP/EIS. Impacts to and from global climate change have been added to the Proposed RMP/Final EIS.
Transportation and Access Including OHV	Gaines Whitcomb	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate or significantly reduce the size of the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Transportation and Access Including OHV	Wilderness Society (The), et. al.	We urge BLM to reconsider its decision to designate the vast majority of the Field Office as “Limited to Existing Roads and Trails” and to instead adhere to the intent of both the national and Colorado State Director guidance and complete comprehensive travel management planning and designate a route system as part of the RMP. BLM should adopt an improved Alternative D (as described throughout these comments) in regards to transportation management. Alternative D does not allow for cross-country travel, closes almost 290,000 acres (21% of the Field Office), and limits travel to designated roads and trails on 1,079,440 acres (79% of the Field Office). Further, Alternative D closes most of the Citizen Proposed Wilderness Areas to ORV use or limits ORV use to designated roads and trails. Further, Alternative D limits to designated roads and trails or closes ORV use in ACECs. This	A clarification has been added to the Proposed RMP/Final EIS, Table 2-39 (OHV Areas Limited to Existing Roads and Trails, by Alternative). The added note states: “Area designations where OHV use is limited to existing routes would only apply until comprehensive transportation planning occurs, at which point OHV use would be limited to designated routes.” This transportation planning will be prioritized such that the key areas will be completed first. This prioritization can be found in Appendix F. Additionally, the commenter’s recommended approach for OHV management was considered under Alternative D. As this decision was analyzed in the Draft RMP/EIS, it is within the decision-range for

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		approach is most consistent with the requirements of 43 C.F.R. § 8342.1 and Executive Orders (Executive Order No. 11644 (1972) (as amended by Executive Order No. 11989 (1977)). We appreciate BLM's decision to include Appendix F which sets out criteria for prioritizing areas to receive comprehensive travel management planning (although the "Adaptive Management" concept is somewhat vague) and believe that BLM should build upon this concept and limit ORV to designated roads and trails for all areas which are not closed to ORV use.	managers to consider in developing the Final RMP.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	Travel planning requires the agency to manage human travel across the landscape. The land use planning process, which addresses the broader landscape within a planning area, provides one of the best opportunities to make travel planning decisions in the appropriate context. BLM must account for the direct, indirect, and cumulative impacts of all roads in the planning area when completing a comprehensive travel management plan. Recommendations: BLM should address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads. Comprehensive travel management planning should occur within the context of the RMP.	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. The impact analysis addresses the impacts of these OHV area designations, as well as the potential for route designations. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. Colorado State BLM policy requires that all areas in limited Travel Management areas have completed Transportation Plans within 5 years of the completion of the RMP/ROD which identify designated routes. This designation process will have its own impact analysis to address direct, indirect, and cumulative impacts from road and trail designation. Areas that are identified as limited in the RMP and do not have completed route designations will be managed as limited to existing routes until completion of Transportation Plans. This transportation planning will be prioritized such that the key habitat areas will be completed first. This prioritization can be found in Appendix F.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	C. The RMP should use a legal definition of "road." BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. The impact analysis

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		consideration. The agency has a definition of “road,” and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM lands. We note, however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these resources. The legal definition of road for the BLM public lands is derived from the definition of “roadless” in the legislative history of FLPMA, the Code of Federal Regulations (43 C.F.R. § 19.2(e)), and IM 2006-173 (“Implementation of Roads and Trails Terminology Report”), which sets out and defines associated with transportation management. Therefore, it is incumbent upon BLM to exclude “user created” routes from the inventory when completing travel management (again, ideally as part of the RMP process). To include these routes is to legitimize and “grandfather in” illegally created routes and/or routes which have not been improved or maintained by mechanical means to ensure regular use. While BLM may benefit from obtaining input on areas that groups believe would be appropriate for their use, any inventory or proposal of routes to be included in the transportation system for the Little Snake travel management planning process should exclude user-created routes. Recommendations: BLM should use a legal definition of “road” (as defined above) when designating routes and exclude “user created” routes from the inventory.	addresses the impacts of these OHV area designations, as well as the potential for route designations. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. This designation process will be conducted according to legal ruling, including those that identified the definition of a road, as well a according to BLM policy, which includes direction on inventorying, naming, and designating routes. Beyond this, addressing the definition of roads in the RMP is beyond the scope of the decisions being made in chapter 2.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	D. Mapping of routes should be conducted in the context of existing resources and current protective management. As part of comprehensive travel management planning (or site-specific travel management planning if BLM refuses to limit ORV travel to designated routes throughout the resource area), we anticipate BLM will produce route maps to illustrate a base travel network, to generate various route designation proposals, and for purposes of receiving public comments. In these contexts, it is vital that the agency clearly mark on all maps or proposed maps areas with existing restrictions on motorized use, such as: wilderness areas, WSAs, current primitive non-motorized designations, Wild and Scenic Rivers, and ACECs. Depicting existing restrictions will ensure that public comments are informed by the knowledge that additional routes will not be permitted in certain areas. Further, maps should indicate resources that could be affected by motorized use, such as wilderness characteristics and wildlife habitat. Public	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. The impact analysis addresses the impacts of these OHV area designations, as well as the potential for route designations. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. This designation process will be conducted using the most up-to-date route date and RMP-level decisions, as well a according to BLM policy. Beyond this, addressing the route inventory in the RMP is beyond

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		comments will then be informed by the potential resource conflicts and the best opportunities for designating areas for non-motorized recreation. Recommendations: BLM should identify both existing restrictions on motorized access and other areas that can be damaged by motorized use on all maps used in travel planning.	the scope of the decisions being made in chapter 2.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	E. The RMP should calculate habitat fragmentation and set standards for functional habitat when making travel planning decisions. We also recommend you look at the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP (relevant sections attached and also available on-line at: http://www.mt.blm.gov/dfo/rod/contents.htm), as an example of criteria that incorporate key aspects of BLM's ORV regulations as well as ecological metrics. While this field office did not complete a comprehensive travel management plan as part of its RMP revision, it included road density targets and included an appendix outlining the principles it will use when completing a comprehensive travel management plan during implementation. Recommendations: BLM should use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Little Snake Field Office when conducting travel management planning.	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. The impact analysis addresses the impacts of these OHV area designations, as well as the potential for route designations. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. This designation process will be conducted according to legal rulings, laws, regulations, and BLM policy, which provides direction on the level of analysis that needs to be performed for road and trail designations. Beyond this, addressing the analysis of route designations in the RMP is beyond the scope of the decisions being made in chapter 2.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	F. Principles of travel management planning. When completing a comprehensive travel management plan, it is vital to complete it in a systematic and transparent manner, as outlined in the following principles: Key principles of travel planning (1) Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective. (2) Prior to conducting an inventory or designation of routes, BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users. (3) BLM should use a legal definition of "road" when designating routes. (4) BLM's consideration of ORV use should take into account its	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. Colorado State BLM policy requires that all areas "limited to designated roads and trails" have completed Transportation Plans within 5 years of the completion of the RMP/ROD that identify designated routes. Areas that are identified as limited to designated roads and trails in the RMP and do not have completed route designations will be managed as limited to existing

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		potential damage to resources and other uses, including exclusion of other users, in compliance with 43 C.F.R. § 8342.1 and Executive Orders (Executive Order No. 11644 (1972) (as amended by Executive Order No. 11989 (1977)). (5) Where BLM presents a baseline travel system, it must present route maps in a responsible manner that does not legitimize illegally-created routes. (6) BLM should include a detailed closure and restoration schedule in the plan. (7) BLM should include and implement a monitoring plan. (8) BLM should include and implement education and outreach in the plan. (9) BLM should develop alternatives that incorporate the agency's ability to implement, monitor and enforce designated routes and areas in light of current budget trends. The Wilderness Society and the Colorado Mountain Club have developed a template for conducting travel management planning, including a detailed discussion of these key principles of travel planning, which we have attached and recommend that the BLM incorporate into the RMP as the process for further planning. Recommendations: BLM should follow the nine travel planning principles listed above to ensure that only routes which truly serve a valid purpose for the public remain open. In addition, the BLM should conduct travel planning in accordance with the template provided with these comments.	roads and trails until completion of Transportation Plans. This transportation planning will be prioritized such that sensitive areas, including key habitat areas, will be completed first. Some areas of the RMPPA have already undergone a route designation process, with required environmental review. A map of the existing designated routes has been added to the Proposed RMP/Final EIS for informational purposes. This designation process will be conducted according to legal rulings, laws, regulations, and BLM policy, which provides direction on how and what needs to be considered for road and trail designations. Beyond this, addressing the analysis of route designations in the RMP is beyond the scope of the decisions being made in chapter 2.
Transportation and Access Including OHV	Wilderness Society (The), et. al.	XI. CLAIMS UNDER REVISED STATUTE 2477 (R.S. 2477) As discussed above, BLM's Land Use Planning Handbook (H-1601-1) and the Executive Orders and federal regulations cited therein obligate the BLM to make travel management decisions, including, for instance, limiting use of ORVs to areas and routes where they will not damage natural resources or cause excessive conflicts with other users of the public lands. The regulations further require BLM to close routes or areas where ORVs are having considerable adverse impacts on other natural resources. 43 C.F.R. § 8341.2. Mere assertions of R.S. 2477 rights-of-way should not affect this decision-making process. Instruction Memorandum (IM) 2006-159, which addresses non-binding determinations that may be made by field or state offices, is very clear that there is no requirement for the agency to conduct a non-binding determination as part of travel planning in general or	The RMP does not include any route designations, either opening or closing routes. The RMP's transportation decisions are limited to area designations, identifying areas as open to cross country OHV use, limiting areas to designated roads and trails, limiting areas to existing roads and trails, or closing areas to all OHV use. Additionally, BLM route restrictions do not apply to valid existing routes, including county roads, permitted uses, and administrative uses. The county has jurisdiction over the county road system; BLM cannot close them. A collaborative transportation planning process will begin immediately following the completion of this RMP and signing of the ROD. BLM is making no determinations regarding R.S.

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		even in relation to specific road closures. Further, as noted in the guidance and by the Tenth Circuit Court of Appeals, the BLM cannot make determinations as to the validity of R.S. 2477 claims – only a court can make a final determination. The IBLA has recently ruled that BLM need not address R.S. 2477 claims when completing transportation plans f. Further, Federal courts have made clear that BLM has the duty and authority to manage its lands in the face of unsupported R.S. 2477 claims. See, e.g., The Wilderness Society v. Kane County, 470 F.Supp.2d 1300, 1306 (D. Utah 2006) ("the presumption on federal land is that ownership and management authority lies with the federal government and that any adverse claimant … is not entitled to win title or exercise unilateral management authority until it successfully has carried its burden of proof in a court of law.") The Draft RMP references the existence of alleged R.S. 2477 claims (and provides a map of the claims), but notes that this is an issue "which cannot be resolved in the planning process" and that "adjudication is beyond the scope of this RMP." Draft RMP, pp. 3-122, 4-195. Accordingly, the Little Snake RMP will not affect valid existing rights, so if Moffat County ever files a claim for an R.S. 2477 ROW in federal court, and if that federal court ultimately finds a claim valid, BLM can, if necessary and appropriate, adjust the RMP. We support the general approach taken in the Draft RMP, such that BLM will not make decisions recognizing R.S. 2477 ROWs as part of the resource management planning process or in related travel management planning actions. The RMP also presents the relative impact of transportation and access decisions under each alternative on access to Moffat County's unadjudicated R.S. 2477 claims, identifying those that would not be available for vehicle use. Draft RMP, pp. 4-197 – 4-199. However, this analysis does not and should not assess the potential impacts of determinations that certain R.S. 2477 assertions are valid. As noted by the BLM, opening R.S. 2477 claims to motorized travel "could change the character of the area, including but not limited to the recreation experience, and ultimately could result in a change in management if vehicle use were inconsistent with the management objects described in the RMP for that area." Draft RMP, p. ES-4. Thus, if an R.S. 2477 determination results in opening to motorized travel routes currently not open, then the BLM must assess the direct, indirect and cumulative impacts on the travel system (such as increases in road density), consider appropriate mitigations, if needed, determine any necessary conditions on use (because even where there is a valid R.S. 2477 claim, BLM still has	2477 claims in this land use plan. RS 2477 assertions are addressed through the 2006 Departmental Policy, which brings Departmental policy in line with the Tenth Circuit Court of Appeals ruling in Southern Utah Wilderness Alliance v. Bureau of Land Management, 425 F.3d 735 (10th Cir. 2005), as well as subsequent BLM policies implementing the Secretary's memorandum of March 22, 2006. While the presence of RS 2477 claims may be taken into consideration during the transportation planning process, as with all other resource inventory information, non-binding determinations are to be identified and made on a case-by-case basis during implementation of the RMP. As the SUWA v. BLM court notes, ultimately deciding who holds legal title to an RS 2477 right of way "is a judicial, not an executive, function." 425 F.3d at 742.

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		the authority to manage the claim to ensure its compliance with environmental and other laws), and amend the RMP or travel management plan (if one is in place). Also, because the R.S. 2477 claims have not been adjudicated – indeed Moffat County has supplied no evidence that they are, and no court of law has found them valid – the travel planning decisions in the RMP and travel management plan (when prepared) cannot be based on these unsupported assertions. The Draft RMP states: "BLM recognizes that R.S. 2477 assertions are made by Moffat County and that many of these routes existed before 1976 on public lands that were unreserved." Draft RMP, p. ES-3. Taken in conjunction with the comparison of impacts of the alternatives on access to R.S. 2477 claims, this language gives the impression that the BLM may leave routes open solely based on the existence of asserted R.S. 2477 claims. As discussed above, the BLM's designation of areas and routes for motorized use must be based on the criteria set out in BLM's regulations and Land Use Planning Handbook – these do not include unsupported R.S. 2477 claims, basing decisions on the location of R.S. 2477 claims may well violate these standards. Recommendations: BLM should neither make determinations regarding R.S. 2477 claims as part of this planning process nor permit those assertions to influence its decisions regarding permitting motorized use. Further, where changes in motorized use occur after preparation of the RMP or travel plan, the BLM should amend the affected documents with full NEPA analysis.	
Transportation and Access Including OHV	David Wilkinson	In the Final Document of the Resource Management Plan Revision, Travel Management, there should be no restrictions on winter access routes to/within the Bears Ears District of Routt National Forest. There is confusing analysis stating effects of OSV on BLM land and its resources. Therefore, closures should not be as extensive as presented in Travel Management Alternatives B-D.	See General Comment Response #33
Transportation and Access Including OHV	Lynda Winslow	- Improve off-road vehicle management by establishing a designated route system for the entire Little Snake Resource Area. It should also eliminate the proposed Sand Wash ORV unrestricted "play" area.	See General Comment Response #10
Vegetation	William Baker	I cannot see how allowing oil and gas exploration and OHV usage under the preferred alternative will protect the ecological values of these important areas (Limestone Ridge and Lookout Mountain). Both activities have documented potential impacts on vegetation,	Limestone Ridge contains native plant communities, unique geological formations, and has habitat for rare plants. These ecological values would be protected in the Preferred Alternative (Alternative C)

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		including direct damage to plants, loss of biological soil crust, and transport of propagules of invasive, non-native plants. These potential impacts are not mentioned in the document, but they are very significant, given that the site has rare vegetation relatively free of these impacts and given the occurrence of rare plants. The document does not indicate how these potential impacts would be avoided, and in my opinion they cannot be avoided if oil and gas exploration and OHV usage is allowed. A CSU/SSR stipulation would not prevent OHV usage from damaging the vegetation, nor would avoidance of the actual occurrence areas of rare plants and vegetation prevent invasion of the area by invasive species transported into the general area by exploration vehicles and OHVs. This site is far too valuable to risk the damages that could occur from these activities.	by controlled surface use (CSU) stipulations and by closing the area to OHV use. Lookout Mountain has habitat for four State and regionally rare plant species, two of which only occur on this site in Colorado. These species would be protected in the Preferred Alternative (Alternative C) through CSU stipulations for oil and gas development and by limiting OHV use to designated areas. The CSU stipulations would not allow surface disturbance in habitat of these rare plant species. Please see chapter 2 of the RMP, Soil Resources, which discusses protection of soil resources, and the Energy and Minerals Section in chapter 2, which describes the surface uses of Limestone Ridge and Lookout Mountain areas. Limestone Ridge area is recommended for withdrawal from mineral location and closed to mineral material sales under Alternative C, the Preferred Alternative. Lookout Mountain area is closed to mineral material sales under Alternative C, the Preferred Alternative. Appendices E and O also discuss protection and restoration guidelines for oil and gas exploration. Chapter 4, Impacts on Soil Resources discusses impacts of on sensitive soils from OHV and other uses. Chapter 4, Impacts on Vegetation discusses noxious weeds and the impacts to vegetation from surface disturbing activities, including oil and gas exploration.
Vegetation	Form Letter #8	The goal of vegetation management and grazing practices must be vigorous and healthy plant communities, which represent the full diversity and range of the natural flora suited for each location's soil and microclimate. To achieve this goal, prescribed fire and other vegetative treatments must be done with planning and consideration for both initial and long-term impacts, as well as the desired condition. Monitoring and comparison research studies must be incorporated into these actions along with grazing history and practices.	BLM incorporates prescribed fire where appropriate as well as other vegetation treatments to achieve desired functioning condition. The details of such projects are determined at the activity level and would undergo appropriate project-specific NEPA analysis.
Vegetation	Form Letter #8	Noxious weeds must be identified and eradicated immediately. Invasive and non-native plants also must be contained utilizing best management. Activities that introduce or spread noxious or invasive weeds, such as natural gas development, illegal OHV use, and road	Surface reclamation and performance standards have been updated in the Proposed RMP/Final EIS. Controlling weeds is an important part of reclamation practices. LSFO employs the principles of Integrated

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		building should be ceased or discontinued. The disturbed soil in these areas must be reseeded immediately with native plants.	Pest Management to identify and control noxious weeds on public lands.
Vegetation	Form Letter #8	Strategies and practices to adapt to long-term drought and/or global warming should be thought out and articulated in the Resource Management Plan as well as the effects that drought may have on the various other uses across the resource area.	BLM developed alternative management approaches that address the issues raised during scoping and that are required by BLM policy. The alternatives were developed based on the issues and in the context of the existing environment, as presented in the Draft RMP/EIS. This includes, as noted in chapter 3, management of public lands in a semi-arid environment prone to periods of lower than average precipitation. Specific practices to be implemented in the case of severe long-term drought would be developed on a case-by-case basis to address the issues that would be present in such a situation. The combined impacts of the alternatives and global warming were added to the Proposed RMP/Final EIS.
Vegetation	Form Letter #8	The Cooperating Agencies (Department Of Wildlife, Moffat County and State Land Board) submitted a proposal that they believe would better protect these large contiguous blocks of sagebrush. However, we believe that these eight areas would be better served being designated as Areas of Critical Environmental Concern or Wildlife Habitat Management Areas with specific management prescriptions that go further than the allowing 5% total surface disturbance and broad criteria for waiving timing limitations.	In compliance with 43 USC 1712(c)2 and 1702(a), BLM reviewed all nominated ACECs as specified in BLM Manual Section 1613-1. Nominations were evaluated based on relevance and importance criteria in 43 CFR 1610.7-2 and BLM Manual 1613-1-.11 and .12. Areas that met both importance and relevance criteria were considered as potential ACECs in the Draft RMP/EIS alternatives. A summary of these ACECs is located in Appendix G (Areas of Critical Environmental Concern Evaluation). Nominated ACECs that failed to meet both relevance and importance criteria were not considered in the Draft RMP/EIS alternatives. BLM identified special management for potential ACECs, as directed by BLM Manual 1613-1 Section 12, to protect and prevent irreparable damage to the relevant and important values. The different relevant and important values in the various potential ACECs have required specific management decisions to address the various threats. The management decisions in each ACEC were designed to protect the relevant and important values. The impact to relevant and important values from identified management associated with each ACEC is noted in chapter 4. Additionally, BLM has updated the

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			management for sagebrush in chapter 2, Alternative C of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes mandatory surface disturbance limitations, is designed to promote large blocks of undisturbed habitat.
Vegetation	Form Letter #8	•BLM must maintain or enhance sagebrush habitats and the connections between them.	BLM has updated the management for sagebrush in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes mandatory surface disturbance limitations, is designed to promote large blocks of undisturbed habitat.
Vegetation	Julian Friedland, Ph.D.	The BLM's plan should also protect the rare native plant species found in the Resource Area, like Gibben's penstemon and narrowleaf evening primrose. Some of these are found nowhere else, and they are part of the region's unique heritage.	Please see chapter 3 special status species section for protection measures for these and other native plant species. Management of federally listed threatened and endangered species, as well as designated critical habitat, and species and habitat proposed for listing, are directed by the Endangered Species Act. Under BLM Manual 6840, BLM is required to manage habitat for candidate species for federal listing, BLM-determined priority (sensitive) species, and state-listed species in a manner that will ensure that all actions authorized, funded, or carried out by BLM do not contribute to the need for the species to become listed. Reasonable and prudent management for a variety of species within the planning area are detailed in the Draft RMP/EIS. The Preferred Alternative protects all special status plants through an avoidance stipulation and Alternative D proposes ACECs to protect these plants. In addition, application of site-specific and project-specific management and mitigation is specifically addressed for all Colorado BLM sensitive species.
Vegetation	Independent Petroleum Association of Mountain States (IPAMS)	b. Easing Timing Stipulations Section 2.5.5.2 provides criteria for easing sage grouse timing stipulations and allowing year-round drilling. On pages 2-17 – 2-18, it is stipulated that if operators limit their disturbance to five percent on a voluntary basis, year round drilling will be permitted. Rolling reclamation is required in order to develop new areas. The part that is in disagreement is Appendix O-Surface Reclamation Performance Standard. The cooperators did not come up with this the BLM did.	BLM has updated the management of sagebrush habitat under Alternative C in chapter 2 and Appendix O, Surface Reclamation Performance Standards of the Proposed RMP/Final EIS. The reclamation standard sets measurable performance standards that can be met in a variety of ways by the operator. BLM and operator will monitor to determine if the standard has been met. This is quintessential

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		It states "Permanent vegetative cover will be accomplished if the basal cover of perennial species, preferably native, adapted to the area, is at least 90 percent of the basal cover of the undisturbed vegetation of adjoining land or the potential basal cover as defined in the Natural Resource Conservation Service Ecological Site(s) for the area. In addition, some presence of a desirable woody species is required." Basal cover by their definition is a "continuous cover, short growth across the landscape. We feel 90% is too high a standard, because of the drought conditions in this country. With this plan and adaptive management we will monitor reclamation and we would have a better idea of the growth patterns rather than placing a percentage in the plan. We would work with the BLM on plant communities.	adaptive management.
Vegetation	Henry Keesling	p. 2-15, Alternative C (Preferred Alternative): The statement here is false. The spread of noxious weeds cannot be prevented by these actions. The fact is that little BLM enforcement action has been taken to enforce stipulations in Environmental Analysis, EAs, for specific projects, oil and gas road and pad construction. Inactions during the past 25 years have resulted in the present extreme noxious weed problem. For example, in the Powder Wash and Hiawatha areas, ignoring the present weed problem and only addressing the "new weeds" will result in what is present now today - weeds, lots of them. The fact that the BLM LSFO neither enforced EA stipulations for weeds nor required reclamation of roads and oil/gas pads in the past, suggests that the proposed "partnering" will fail to cope with the current growing weed problem.	BLM does address all weeds, but not specifically new weeds. BLM has always required reclamation of roads and oil/gas pads. All editorial/document content/document adequacy suggestions will be reviewed, considered and applied to the Proposed RMP/Final EIS, where appropriate.
Vegetation	Henry Keesling	The weed treatment plans proposed in this document, Alternative C, need to be reviewed very closely regarding the existing problem. Past actions have resulted in the current problem in these areas. This partner program is nice, warm and fuzzy but will not result in weeds going away on the existing thousands of acres. Unless past BLM behaviors and actions are changed, partnerships will not change anything. Provide a narrative here, page 2-15 that addresses how conditions came about and how BLM and its partners will change their actions to address, in a holistic manner, the total weed problem in these areas	Characterization of weeds is covered in chapter 3. Partnering can provide valuable information in fighting noxious weeds. The partnership in Moffat County is focusing on identifying and mapping weed infestations, experimenting with different treatment methods, and treating large areas. Chapter 2, Alternative A, notes the existing management; and combined with chapter 3, this provides sufficient information. The success of specific management actions depends on funding and staffing, both of which are not RMP-level decisions.
Vegetation	Moffat County Commissioners	p.2-14 Alternative C Moffat County has commented in the past that vegetation treatments seem arbitrarily low. We also realize several sideline discussions have occurred to compile these acreage treatments per year. We	These targets were developed by an interdisciplinary team, including fire ecologists, and are based on ecological need and realistic funding. The team broke down the planning area into different vegetation types, and gauged the need for treatment

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		request BLM justify the rational used to create the numbers within this section of the RMP.	of each type. Past funding trends were employed to create realistic and obtainable targets. BLM disagrees that the targets are low, especially when natural fire is not included in the treatment targets. BLM states that it will treat 530 acres of sagebrush and also 1,600 acres per year of juniper encroachment on sagebrush habitat. That equals 2,130 acres per year, or 42,600 over 20 years. There has been approximately 40,000 acres of sagebrush dominated areas burned naturally since 1988 in the LSFO. If we assume we will see a similar amount in the next 20 years it would total 82,600 acres. The AMS says there is 350,000 acres of sagebrush type in this FO, which means that 24% of all sagebrush areas would be treated over the life of the plan, which is quite substantial. In fact, if BLM were to increase the targets, they could exceed the levels recommended by sage-grouse guidelines. During the life of the plan, BLM will continue to monitor the level of treatment and adjust management accordingly.
Vegetation	Moffat County Commissioners	p. 2-15. 2.5.5 Fish and Wildlife Habitat Moffat County requests, in the second paragraph, a sentence be added that not only is it BLM's role '…to provide habitat that supports desired aquatic plants and animals.' But that BLM will also 'actively pursue weed control and comply with state and federal weed control laws.'	The Draft RMP/EIS already includes language related to weed management in Section 2.5.4 (vegetation). Specific goals and objectives for weed control on included on page 2-13, with management actions noted on page 2-15 of the Draft RMP/EIS. These pages include language that BLM would “reduce the occurrence of noxious and undesirable plant species, as well as to “integrate weed management across the landscape and ownership boundaries.” BLM is required to comply with all laws. Specific language requiring BLM to comply with laws is not needed in the RMP; as such a decision is not an RMP-level decision.
Vegetation	Moffat County Commissioners	p.3-24 Vegetation -Current Conditions-Plant Communities Moffat County requests a paragraph clarifying that Desired Plant Communities (DPC) have been established throughout history in Moffat County and that DPCs coexist with native plants communities, but don't have to be native.	DPCs are adequately described in the RMP. The issue of native and non-native species is addressed in this vegetation objective: “Establish desired plant communities (DPC), in coordination with stakeholders across the LSFO, in a way that focuses on native communities and intact ecosystems while allowing non-native species, where appropriate, on a case-by-case basis.”

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Vegetation	Moffat County Commissioners	p. 3-38 Second Paragraph The discussion of ungulates causing hummocks, which are implied to be inherently bad, is seriously flawed. Please reword paragraph to reflect the positive side of ungulate use near riparian areas and remove the negative connotation of hummocks. Clarify hummocks are part of the evolving ecology of an area.	The language in the Draft RMP/EIS does not imply that hummocks themselves are inherently bad, it merely states that concentrated wildlife or livestock use, as well as high forage utilization rates, have led to the development of small hummocks. The commenter does not dispute the fact that such use can result in such an effect, just that the Draft RMP/EIS portrays such a change as “bad”. Further, the opening sentence of the same paragraph notes that “the riparian and wetland condition in many areas of the RMPPA has been improved through adjustment and implementation of grazing systems.” This indicates that riparian and wetlands have improved in the face of continued, albeit adjusted livestock grazing. While the remainder of the paragraph describes the impacts of increased runoff to riparian systems, such changes, while occurring by natural processes, were initiated by concentrated or heavy ungulate use. Further interactions between livestock grazing and riparian areas are described in chapter 4 of the Draft RMP/EIS. Additionally, the commenter does not include any specific benefits of ungulate use to riparian areas other than the request to reflect any such unsubstantiated positives.
Vegetation	National Park Service	Alternative C also provides the best fit with Monument efforts to manage invasive weeds along the Yampa River. This alternative provides the upstream support needed to try to manage invasive weeds on Monument lands. Again we would like to work cooperatively with you on this common problem.	The Draft RMP/EIS chapter 2 (page 2-15) includes text encouraging the maximum use of cooperative agreements for the control of invasive species. This would include cooperative work with resource users and other stakeholders to address the shared weed problems.
Vegetation	NW Colorado Oil and Gas Association	There is some concern that some companies could be close to the 5% disturbance on their existing well pads and roads, and facilities. We understand that reclamation is the key to reduce the size and be able to participate in the 5% surface disturbance program and year-round drilling. In the cooperator’s agreement they did not go into detail on reclamation standards, but the BLM did in Appendix O. We have concerns with the surface reclamation performance standards in Appendix O. We would first request the more adaptive management standards be used for this reclamation portion. The major concern is page 0-1 Permanent vegetative cover and the meaning of basal cover of perennial species, is at “least” 90 percent. We would like a definition of basal cover is that the entire	BLM has updated the management of sagebrush habitat in Alternative C in chapter 2 and revised the surface reclamation performance standards of the RMP EIS. The reclamation standard sets measurable performance standards that can be met in a variety of ways by the operator. BLM and the operator will monitor to determine if the standard has been met. This is quintessential adaptive management.

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		disturbance covered with native species and what growth. The percentage is extremely high for many areas of our country which is very drought driven country. We agreed rolling reclamation is important and the companies should continually work on this in order to be a part of the 5% program, but it should be more adaptive management where it is a case by case in the area and monitored. Stakeholders should come to agreement on the health of the reclaim and once agreement is made the operators should have assurance those acreages will be credited towards their disturbance ratio. The operators will also want assurance if they use existing wells and facilities and reclaim portions of those they should get credit towards their 5%.	
Vegetation	Public Lands Advocacy	Reclamation – Appendix O: Industry routinely engages in full and interim reclamation practices for all disturbed areas associated with its operations. That BLM expects permanent vegetative cover to be accomplished on at least 90 percent of a disturbed area within two growing seasons before it is considered properly reclaimed is unreasonable due to conditions in the area. This is a particularly important issue because this requirement is compounded by the severe surface disturbance thresholds proposed throughout the planning area. A reclamation plan is a required component of the Plan of Development and BLM monitors the progress of the reclamation. Therefore, it is more reasonable to return acreage to the “kitty” upon initiation of reclamation procedures rather than when it achieves 90 percent cover. As mentioned, companies will engage in interim reclamation once well sites are put into production. Interim reclamation should not be held to the same standard as that required for plugging and abandonment of a well site.	BLM has revised the surface reclamation performance standards of Appendix O in the Proposed RMP/Final EIS. The reclamation standard sets measurable performance standards that can be met in a variety of ways by the operator. BLM and operator will monitor to determine if the standard has been met. This will allow development to continue while ensuring sensitive resource values are not significantly impacted.
Vegetation	Questar, Rockies Region	6. Appendix 0 - Surface Reclamation Performance Standards Questar appreciates the flexibility in reclamation standards which will allow for the application of a wide range of potential reclamation practices, rather than prescribing a fixed reclamation protocol that may not be suitable or necessary in some areas. We are, however, concerned with the proposed measurement of reclamation success. Appendix O requires a reclaimed area to achieve 90 percent of the basal cover found on adjacent undisturbed landscape or as defined for an appropriate NRCS Ecological Site to meet the definition of "permanent vegetative cover." A reclamation standard requiring establishment of 90 percent cover is very stringent considering the	Appendix O of the Proposed RMP/Final EIS has been revised. Temporal restrictions for how fast an area must be reclaimed are not included in the reclamation performance standard, as the purpose of the standard to establish whether an area has been successfully reclaimed and would no longer count against the 1 or 5% disturbance thresholds. The reclamation standards set measurable performance standards that can be met in a variety of ways by the operator.

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		environment being reclaimed and the potential for drought which severely impedes reclamation attempts. Questar proposes that foliar cover or plant density is a better measurement of reclamation success, since reclamation sites generally consist of younger and often rhizomatous plants, both of which lack notable basal cover. Basal cover measurements are best for woody species and are better suited for monitoring long-term trends, not meeting standards. Though foliar or vegetative cover estimates are more susceptible to recent precipitation patterns, comparisons will be made with adjacent undisturbed areas, thereby making this sensitivity moot for the analyses. Questar believes the 90% cover requirement is unachievable in this environment within the 2-year time frame allotted. The 90% measurement should be reduced to 80% and should only apply to final abandonment success standards when bond release is requested. Permanent interim reclamation should have a different measurement of success. Questar recommends the following measurements be used when determining reclamation adequacy: The establishment of a viable seedling cover within 1 - 2 years of initiation of reclamation. Viable seedling cover shall consist of species from the approved seed mix or present on the surrounding undisturbed landscape; Within 5 years of initiation of reclamation, establish at least 50% vegetative cover; and Within 8 years of initiation of reclamation, establish at least 80% vegetative cover. Monitoring will continue until the 80% cover value is achieved; however, where the earlier (2 year) cover values are attained, reclamation or rollover credit would be granted. Reclamation work often continues into December and sometimes January, depending on the weather. Therefore, the January 1 due date for annual reclamation reports should be changed to March 1. This will provide operators enough time to incorporate all data into the report. Recommendation: Revise Appendix 0 to require a viable seedling cover within 1-2 years of initiation of reclamation in order to grant reclamation credit. Establish at least 50% vegetative cover within 5 years and at least 80% vegetative cover within 8 years. Change the due date for annual reclamation reports to March 1 to allow for inclusion of fall/winter reclamation information.	

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Vegetation	Questar, Rockies Region	Vol. 2, 0-1: Reclamation measurements and standards are very stringent and likely unachievable within the LSFO area. Questar proposes that the current 90% measurement be replaced as follows: - The establishment of a viable seedling cover within 1 - 2 years of initiation of reclamation. Viable seedling cover shall consist of species from the approved seed mix or present on the surrounding undisturbed landscape; Within 5 years of initiation of reclamation, establish at least 50% vegetative cover; and - Within 8 years of initiation of reclamation, establish at least 80% vegetative cover.	Appendix O of the Proposed RMP/Final EIS has been revised. Temporal restrictions for how fast an area must be reclaimed are not included in the reclamation performance standard, as the purpose of the standard to establish whether an area has been successfully reclaimed and would no longer count against the 1 or 5% disturbance thresholds.
Vegetation	Questar, Rockies Region	Vol. 2, 0-1: Change the due date of reclamation reports from January to March to allow for inclusion of fall/winter reclamation information.	BLM has updated Appendix O, Surface Reclamation Performance Standards of the Proposed RMP/Final EIS. The reclamation standards set measurable performance standards that can be met in a variety of ways by the operator. The due date has been updated to December 31 to keep reports within the calendar year.
Vegetation	The Nature Conservancy in Colorado	b. Limitations of current provisions for other species and habitats. i. We fully support the goals above as they are essential for BLM to meet its mandate to “sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.” However, the RMP needs to include more specific information about how these goals can be achieved by setting quantitative goals and/or objectives for conserving large functional blocks of habitat. As Noss et al. (1997) state, “Large blocks of habitat, containing large populations, are better than small blocks with small populations. The principle of bigness is another of the universally accepted generalizations of conservation biology…The larger the area, the more habitats and species it will contain.” Such large and relatively undisturbed areas are becoming increasingly rare throughout the world, including in the Little Snake Planning Area, which warrants special attention to them.	BLM has updated the management for sagebrush in Alternative C of chapter 2 of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes mandatory surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. Issues related to site-specific planning decisions are being deferred to activity level planning and implementation, which will be completed for areas such as habitat conservation sites after the completion of this plan.
Vegetation	The Nature Conservancy in Colorado	c. Recommendations for other species and habitats. i. Set quantitative desired outcomes for the largest and most functional patches for other species and habitats (e.g., big game). These outcomes should: • Greatly limit new disturbance for the largest and most functional patches that have been relatively undisturbed and/or unleased to date; particularly those which contain significant concentrations of	The Draft RMP/EIS considers a wide range of alternatives for Vermillion Basin, including closure under Alternative D and imposing a 1% threshold for disturbance under Alternative C (see page 2-48 of the Draft RMP/EIS). Alternative C in the Proposed RMP/Final EIS was revised to manage Vermillion Basin specifically for its wilderness characteristics,

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		priority species or vegetative communities (e.g., rare, sensitive). • Allow no new disturbance for the most important of these patches, such as Vermillion Basin. Note: The Conservancy has identified Vermillion Basin as part of a 187,000-acre site that is a high priority for conservation in the Wyoming Basins Ecoregion, and CNHP has identified part of Vermillion Basin as a PCA.	including closing the area to oil and gas leasing. Alternative B in the Proposed RMP/Final EIS was revised to include the 1% ceiling on surface disturbance. In addition to this, the Proposed RMP/Final EIS includes 1% and 5% disturbance thresholds for sagebrush habitat of high and medium importance, respectively. All these stipulations are designed to protect large blocks of areas unfragmented by mineral development. BLM is responsible for ensuring that management actions are consistent with the conservation needs of the species and that management does not contribute to the need to list the species. The analysis in the Proposed RMP/Final EIS shows that BLM's Proposed RMP accomplishes this goal.
Vegetation	The Nature Conservancy in Colorado	Appendix O does not go far enough to assure reclamation in regards to invasive species/noxious weeds and vegetative cover. Specifically we strongly recommend that BLM add the following to Appendix O: • Require that the vegetation-related definitions and measurements be accomplished to ensure that reclamation has been achieved. At present, only soil stabilization measures are required after two years. • Native species should be required in the seed mix. If sufficient native seed is not available, the operator can request a waiver from BLM. State, “Do not use aggressive, non-native grasses…in reclamation and seed mixes” rather than “Avoid the use of aggressive, non-native grasses….” • The number of species is not the only indicator that should be used to assess success. If the activity disturbed a shrubland, then appropriate shrub species must be reestablished in the appropriate cover. BLM could provide a list of acceptable species by community type. This native species list could easily be developed in consultation with organizations such as the Colorado Natural Heritage Program. • All plantings and ground cover must be certified weed free. • Appendix O states that one reclamation practice is to effectively control noxious weeds. Please define this practice. We recommend defining “effective control” as eradication of any noxious weeds. Eradication cannot be done quickly and often requires control	Appendix O in the Proposed RMP/Final EIS has been revised to include additional measurements and reclamation standards to be achieved upon successful reclamation. Concerning defining what species should be contained in the seed mixes, this is best determined on a case-by-case basis to best suit the site-specific conditions (e.g., vegetation, soil, climatic). Limiting the use of a given type of species for reclamation efforts at the land use plan level would reduce management flexibility that could also reduce the success of some reclamation efforts. The revised Appendix O also contains language addressing weeds, both in the presence of weeds in the reclaimed area, as well as in the weed-free status of reclamation materials. Additionally, BLM maintains a weed-free policy for all its activities, so stronger language in the RMP is not necessary. Finally, the revised Appendix O notes that reclamation will be successful when the site is free of state- or county-listed noxious weeds. However, requiring lessees to monitor for weeds for up to 10 years after other reclamation has been deemed successful is not a reasonable requirement. Additionally, the 10-year figure is an arbitrary seed bank range and does not apply to all the potential invasive species. Therefore, BLM will maintain the

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		actions over the course of several years. It is important to not only eradicate any adult plants, but to ensure that they have not reproduced and that any seeds are eliminated from the seed bank. This can take up to 10 years to ensure the depletion of the seed banks once an adult plant has been missed and gone to seed.	existing reclamation standards in the revised Appendix O in the Proposed RMP/Final EIS.
Vegetation	The Nature Conservancy in Colorado	It will be difficult, if not impossible, for BLM to evaluate progress toward non-quantified desired outcomes or management actions. For example, one objective states, “Maintain large patches of high-quality sagebrush habitats, consistent with the natural range of variability for sagebrush communities in northwest Colorado” (p.2-12). While the overall concept of this objective is ecologically-sound, it will be very difficult for BLM to know (1) which management actions to take to achieve this action, and (2) whether and when this objective has been achieved. How many large patches does BLM want to maintain? How big are “large patches?” What makes a patch “high-quality?” How will BLM define “natural range of variability?” Completing the steps in this planning support tool can resolve all of these questions and provide much more clear management guidance for this and other goals, objectives, and management actions.	BLM has updated the management for sagebrush in Alternative C of chapter 2 and revised the Surface Reclamation Performance Standards of the Proposed RMP/Final EIS to reflect the most updated scientific information. The revised management, which includes surface disturbance limitations, is designed to promote large blocks of undisturbed habitat. The size of a patch would depend on site-specific characteristics, such as topography and vegetation. Such characteristics would be addressed during the activity level.
Vegetation	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.4.2 Management Actions – Vegetation Treatments (p.2-14): Alt. C states, “Work with the Northwest Colorado Sage-Grouse Working Group to identify, maintain, and restore an average of 530 acres of sagebrush per year.” This action implies that restoration will occur each year, which is not likely feasible. Consider rewording this action as, “Work with the Northwest Colorado Sage-Grouse Working Group to treat an average of 530 acres of sagebrush per year.”	The Proposed RMP/Final EIS has been revised to change the action from one of restoration on an annual basis to one of treatment, recognizing that restoration may not be accomplished immediately upon treatment.
Vegetation	Vermillion Ranch Limited Partnership	We request sage brush be managed to sustain livestock production	The Draft RMP/EIS chapter 2 considers managing vegetation for a Desired Plant Community (DPC) with objectives in the Preferred Alternative (Alternative C) that include managing vegetation to emphasize livestock grazing, along with other resources and values. Additionally, Alternative B of the Draft RMP/EIS analyzed emphasizing commodity uses, of which livestock grazing is one, with only compliance to existing regulations for other resource considerations.
Vegetation	Vermillion Ranch Limited	Pg 2-14 Veg treatments acreages are arbitrarily low and do not adequately sustain the livestock sustainability goals.	These targets were developed by an interdisciplinary team, including fire ecologists, and are based on

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	Partnership		ecological need and realistic funding. The team broke down the planning area into different vegetation types, and gauged the need for treatment of each type. Past funding trends were employed to create realistic and obtainable targets.
Vegetation	Vermillion Ranch Limited Partnership	Pg 2-15 noxious weed add comply with state and local weed laws	It is not BLM policy to state in a land use plan that we will comply with the law. BLM must comply with the law regardless of RMP decisions.
Vegetation	Vermillion Ranch Limited Partnership	Pg 3-38 3.1.5.2 5th paragraph Oppose Hummock statement. Request removal or tell both sides.	The language in the Draft RMP/EIS does not imply that hummocks themselves are inherently bad, it merely states that concentrated wildlife or livestock use, as well as high forage utilization rates, have led to the development of small hummocks. The commenter does not present information to refute the fact that such use can result in such a result, just the commenter opposes the statement. While the paragraph describes the impacts of increased runoff to riparian systems, such changes, while occurring by natural processes, were initiated by concentrated or heavy ungulate use. Further interactions between livestock grazing and riparian area are described in chapter 4 of the Draft RMP/EIS. Additionally, the commenter does not include any information of to refute the stated language or to present an opposing conclusion.
Vegetation	Vermillion Ranch Limited Partnership	Pg 4-31 4.3.4 Analysis assumptions: Still based on adequate forage available for wildlife and wild horses which is not correct	This assumption has been removed from the text in the Proposed RMP/Final EIS.
Vegetation	Western Watersheds Project	As pointed out in the research we cite, continuing to “treat” vegetation such as sagebrush, juniper, aspen while ignoring the role of livestock and water developments in altering the ecology of these communities by depleting the herbaceous native vegetation and altering fire cycles is a flawed strategy. No treatments should be allowed unless the causes of vegetation community dysfunction have been corrected first. Treatments should only be used for restoration, employ only native seeds and be accompanied by changes in management that eliminate the causes. All treatments should be accompanied by a systematic, quantitative monitoring program to document their continuing restoration, identify problems and provide a scientific basis for corrective actions.	As described in the Public Rangelands Improvement Act of 1978, it is the policy of the United States to “inventory and identify current public rangelands conditions and trends” and to “manage, maintain and improve the condition of the public rangelands so that they become as productive as feasible for all rangeland values in accordance with management objectives and the land use planning process” (43 USC 1901b). Additionally, FLPMA states that public lands be managed in a manner to protect ecological values and will also provide food for domestic animals, and that management be based on the basis of multiple use and sustained yield (43 USC

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			1701(a) 7 and 8). BLM seeks to identify and rectify systemic issues associated with vegetation management. However, based on the laws stated above, treatments do not have to be limited to restoration activities. BLM manages vegetation resources for multiple uses, including ecological values, wildlife habitat, soil and watershed health, and livestock forage. BLM also uses a variety of monitoring systems to fulfill Congress' direction to maintain an inventory of public land resources, as well as rangeland condition and trends.
Vegetation	Wilderness Society (The), et. al.	The Draft RMP lays out laudable goals for sagebrush habitat management on page 2-15. However, it is not clear how these goals will be achieved. Page 2-216 suggests "Restriction on surface disturbing activities and implementing BMPs for surface disturbing activities could decrease impacts on vegetation" However, BMPs are not required, only recommended.	Section 4.3.4 of the Environmental Consequences portion of the Draft RMP/EIS describes how proposed management actions would affect vegetation, both positively and negatively. BMPs are dynamic and are not one-size-fits-all solutions. BMPs are selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. The alternatives do not contain an exhaustive list of BMPs. Additional BMPs may be identified during an interdisciplinary process when evaluating site-specific management actions. Implementation and effectiveness of BMPs need to be monitored to determine whether they are achieving RMP goals and objectives. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met.
Vegetation	Wilderness Society (The), et. al.	A report for the Colorado Division of Wildlife identifies sagebrush habitats of northwest Colorado, North Park-Middle Park and the Gunnison Basin as the three areas with the largest concentrations of sagebrush habitat in Colorado and states that "These three areas should be considered cornerstones of sagebrush conservation in Colorado" (Boyle and Reeder 2005). The maps in the DOW report show that the Little Snake Resource Area contains the largest region of sagebrush habitat of the three areas and the largest patch of "Priority 1" lands for sagebrush protection and management as identified for the presence of species with a "nearly complete	Chapter 3 of the Draft RMP/EIS includes a discussion of the nature, condition and values associated with the sagebrush steppe vegetation communities in the LSFO RMPPA. The Draft RMP/EIS chapter 4 addresses the potential for fragmentation of wildlife habitat from oil and gas development and OHV use. The importance of these areas is indicated by the Draft RMP/EIS, and is clarified by changes made in the Proposed RMP/Final EIS. After review of public comments and

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		reliance on sagebrush habitats." This means that preserving some of the best remaining sagebrush areas in the Little Snake Resource Area is important for the conservation of sagebrush-dependent species throughout the region. The Draft RMP confirms the importance of sage steppe habitat to wildlife on page 3-28: "Wyoming big sagebrush is the most frequently eaten sagebrush species and is a staple for pronghorn and Greater Sage-Grouse. It is also one of the dominant species found on antelope and mule deer-crucial winter ranges." Recommendations: The important role of sage steppe habitat should be acknowledged in the Affected Environment chapter (Draft RMP, pp. 3-28 to 3-29 and 3-37 to 3-38). Additionally, the cumulative impacts of management activities such as oil and gas development and ORV activities should be added (Draft RMP, p. 4-230). In particular, the Draft RMP should describe how the development of 3031 well pads and associated infrastructure will fragment what is now the largest region of sagebrush habitat in the state and how this will impact sagebrush protection and restoration in the state of Colorado and beyond.	extensive coordination with CDOW specialists, the sagebrush management actions contained in the Proposed RMP/Final EIS were revised to limit disturbance of high priority sagebrush habitat to 1% for new leases (mandatory) and 5% for existing leases (voluntary, incentive based), with a 5% limit in medium value habitats for new (mandatory) or existing (voluntary, incentive based) leases. It is also important to note that the ceiling on disturbance is not the only stipulation associated with development in these areas. The stipulation also states that BLM would require PODs from oil and gas operators showing a strategy to reduce habitat fragmentation, in addition to the disturbance ceilings. Map 2-3 illustrates the extent of this habitat protection approach, which covers the majority of the planning area. Collectively, these stipulations would maintain large blocks of high priority sagebrush habitat and limit habitat fragmentation.
Vegetation	Yates Petroleum Corporation (through agent)	Page 2-119 Vegetation Yates agrees with helping the sage-grouse biome but baulks at the typical BLM total sage brush avoidance policy. It must be remembered that the surface used is not raising sage-grouse but is often raising cattle that eat the grass that BLM requires us to disturb in preference to the sage brush.	Due to BLM's multiple use mandate, vegetation cannot be managed for a specific resource. Wildlife, soils and other resources must be considered in the management of sagebrush. The Desired Plant Community decision states that DPCs objectives in the Proposed RMP include managing vegetation to emphasize livestock grazing along with other resources and values (chapter 2). Requiring sagebrush avoidance is not mentioned anywhere in the document.
Vegetation	Yates Petroleum Corporation (through agent)	Page 2-123 Again, the total emphasis is on sage brush without regard to the need for forbs etc. Yates encourages the use of removal of old growth and replanting of new growth sage brush but not to the detriment of the surface user who may want grass.	Goal B for Fish and Wildlife Habitat, Table 2.46 in the Draft document "identify and initiate restoration and rehabilitation of sagebrush habitat while maintaining a mosaic of canopy and seral stages." A mosaic of canopy and seral stages includes the understory of sagebrush habitat of which forbs and grass are included. BLM manages the public land for multiple uses, not for private users who may want grass. The Draft RMP/EIS states that BLM will treat 530 acres of sagebrush and also 1,600 acres per year of juniper encroachment on sagebrush habitat. The vegetation treatments will result in additional forb and grass production.

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Vegetation	Yates Petroleum Corporation (through agent)	Page 2-119-120 and page 2-123 Vegetation: Yates also agrees to control noxious weeds. However, the BLM policy of requiring immediate spraying of weeds after reclamation has started is counter productive unless no other reseeded species have sprouted. The weeds often provide cover and retain moisture while the desired species are being established. The weeds will diminish with time naturally as the planted vegetation gets established.	While it is true that weeds do provide cover and may retain soil moisture in reclaimed areas, the reason weeds are often called “invasive species” is due to the rapid spread and ability to dominate a disturbed area and invade adjacent, undisturbed plant communities. Weeds, if established before native species, will out-compete native species and spread rapidly through a reclamation area.
Vegetation	Yates Petroleum Corporation (through agent)	Page 2-134 Use of directional drilling for sage-grouse habitat protection is unwarranted in any circumstance. New-growth sage brush is just as important as old growth. Limiting compressor stations to 2500 feet from a lek is arbitrary and unwarranted. Topographic barriers and wind direction must come into play. Holloran showed that leks in up wind directions were not affected and in fact were stable to increasing.	While sage-grouse need an age-mosaic of sagebrush cover, as the commenter notes, the development of multiple oil and gas wells leads to surface disturbance from well-pads that results in a direct loss of habitat and displacement of birds, not the presence of new-growth sagebrush. Therefore, encouraging directional drilling will reduce the disturbance footprint associated with oil and gas development. New-growth sagebrush would only be present in such areas after reclamation occurs. The section referred to by the commenter does not mandate directional drilling or a 2,500 feet buffer, but notes that they are BMPs that would be "encouraged for all surface disturbing activities" as a means to reduce the footprint of disturbance or to reduce disturbance to birds. It is also important to note that BMPs are not one-size-fits-all solutions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations, policy, and direction or new scientific information. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions.
Visual Resources	Moffat County Commissioners	p.2-51 –Visual Resource Management (VRM) Action Moffat County requests the VRM discussion add a sentence clarifying for purposes of this RMP, "VRM evaluations apply to the boundary of the management area to the inside, not from the outside of the management area looking in, nor from the inside of the management area looking out." We also request that everything	How visual resources management classes are addressed during implementation of the RMP is clearly addressed by BLM policy (BLM-M-8400 and BLM-M-8431) and cannot be revised in an RMP. In relation to the commenter’s request for VRM Class IV, Alternatives A and B both consider VRM Class IV

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		South of Highway 318 to the southern Little Snake Field Office Boundary and everything East of Range 96 be labeled as Class IV in the Preferred Alternative because BLM surface ownership is minimal, and viewsheds are controlled by private landowners rather than BLM. Just the way BLM has not chosen to recommend wild and scenic segments across private ground because private land creates unmanageable segments for BLM, VRM classifications should not be made where BLM has minimal control over the viewshed.	in the areas identified. Land ownership patterns were considered when developing the Proposed RMP, as well as other resource considerations, as required by FLPMA.
Visual Resources	NW Colorado Oil and Gas Association	We would request to define the VRM classifications.	VRM classifications are defined in chapter 3 of the Draft RMP/EIS, Section 3.1.13.2. The objectives for all four classes as listed in this section are quoted directly from the BLM VRM manual (H-8410-1, Section V, part B).
Visual Resources	Wilderness Society (The), et. al.	BLM's description of Visual Resources (Draft RMP, p. 2-51) should be amended to state that compliance with VRM classes is not discretionary. BLM's Preferred Alternative only provides VRM I status to Wilderness Study Areas (WSAs), while Alternative D provides VRM I status to WSAs and the Cross Mountain ACEC (which was released from ACEC protection in Alternative C) (Draft RMP, p. 2-51). The purpose of designating Cross Mountain ACEC VRM I is to protect this area should the Cross Mountain WSA be released by Congress. The area encompassed by the existing Cross Mountain ACEC is one of, if not the most scenic area in the Little Snake Field Office. BLM should maintain the VRM I classification of this area to protect the area should Congress release the Cross Mountain WSA.	The fact that adherence to VRM Classes designated in an RMP are not discretionary is not an RMP decision, it is policy and has been upheld in IBLA cases. This fact does not need to be repeated in the RMP. If the Congress releases the Cross Mountain WSA for other uses, Alternative C would designate it as VRM Class II, but it would also close the area to all mineral leasing, location, or development, designate it an exclusion area for ROWs, and close it to OHV use. While it would be VRM Class II, all potentially disruptive uses would be precluded, thereby protecting the visual resources.
Visual Resources	Wilderness Society (The), et. al.	BLM should prioritize scenic value as a resource that is conserved and the RMP should state that compliance with VRM classes is established. Further, BLM should provide VRM protection and limit surface disturbance within important viewsheds.	The Draft RMP/EIS considers a range of visual alternatives, maintaining the existing character of the landscape (VRM Class II) on between less than 1% and up to nearly 14% of the RMPPA. The fact that adherence to VRM Classes designated in an RMP are not discretionary is not an RMP decision, it is policy and has been upheld in IBLA cases. This fact does not need to be repeated in the RMP.
Water Resources	Environmental Protection Agency (EPA), Region 8	303(d) listed streams: There appears to be information missing in the DEIS on protecting 303(d) listed stream segments from further degradation. There also is a discrepancy between the TMIDL listed streams in the DEIS and EPA's database. EPA's Clean Water Act section 303(d) database for the 2006 cycle identifies two segments in the LSFO that are listed (meaning they are impaired waters	The Draft RMP/EIS used the most up to date information that was available in a timely manner to be able to meet document preparation and printing schedules. Tables 3-8 and 3-9 were updated with the most up to date data available for the Proposed RMP/Final EIS.

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		requiring Total Maximum Daily Loads). Dry Creek below Seneca is listed for Se and is included in the DEIS. First Creek below Second Creek, Elkhead Creek below First Creek, is listed as impaired for e.coli but is not listed in the DEIS. An additional segment, Stagecoach Reservoir, is listed in the DEIS, but our information shows it is on the CWA section 305(b) list as a water body of concern, but is not a 303(d) listed water. This should be corrected.	
Water Resources	Environmental Protection Agency (EPA), Region 8	Outstanding Waters: There are Outstanding National Resource Waters in the wilderness areas around the LSFO which should also not be degraded. EPA recommends that the EIS address whether these waters will be impacted by activities covered by the RMP.	The EIS associated with this planning effort focuses on impacts to BLM-administered surface estate or BLM-administered federal mineral estate. These waters raised by the commenter are completely within National Forest lands and do not overlie federal minerals. Additionally, the waters raised by the commenter are up-stream from BLM lands. Proposed uses on BLM surface/mineral estates down-stream from these Outstanding National Resource Waters would not migrate up the flowing water bodies, except for potential acid deposition in some lakes in wilderness areas, which was analyzed in the Additional Air Quality Impact Assessment. Therefore, these waters were not included as part of the Affected Environment and impacts were not included in chapter 4.
Water Resources	Environmental Protection Agency (EPA), Region 8	No surface occupancy requirement for perennial waters: The preferred alternative requires no surface occupancy stipulations applied up to one-quarter mile from perennial water sources, if necessary (DEIS page ES-7). The DEIS does not explain, however, how this distance was selected. EPA recommends that the EIS include a discussion of how application of this provision will be protective of water quality, and whether, in some cases, additional protection may be necessary.	The ¼ mile distance came from a decision in the 1989 ROD: “No-surface-occupancy will be established from within 500 feet to ¼ mile of perennial water sources.” The decision was modified in Alternative C (Proposed RMP) to clarify that even areas within 500 feet should be subject to the NSO stipulation. A distance of one quarter mile typically encompasses the entire riparian system. However, when a proposed action goes through site-specific NEPA, the analysis might reveal the need for other specific mitigation measures. The impacts of this decision have been further clarified in chapter 4 of the Proposed RMP/Final EIS.
Water Resources	Form Letter #8	BLM must improve the Proper Functioning Condition of local streams far beyond the current 27%. Proper functioning riparian systems are integral to not only wildlife habitat, but they also are a major component in maintaining proper water quality.	BLM concurs that proper functioning conditions must be improved. However, as noted on page 3-32 of the Draft RMP/EIS, there are a variety of reasons the riparian/wetland areas are functioning at risk or not functioning. By regulation, if the Standards for Rangeland Health are not being met, and livestock

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			grazing is determined to be a significant contributing factor, appropriate actions must be taken that will result in significant progress being made toward meeting the standards within timeframes specified in the regulations. These actions are addressed on a case-by-case basis and are tailored to the site-specific conditions at each area that is not in properly functioning condition.
Water Resources	Form Letter #8	Water quantity and quality may be negatively impacted from escalated oil and gas operations. Over 1.6 million barrels of water were produced (taken out of the ground) in 2005, which equates to over 150 acre feet of water. This groundwater withdrawal will only increase over the coming years, creating the question of how we will compensate for its loss. BLM must prevent the depletion and contamination of groundwater resources from increased oil and gas development.	BLM is required to maintain water quality where it presently meets EPA-approved State of Colorado water quality standards and to improve water quality on public lands where it does not meet standards defined by Section 303(d) of the Clean Water Act. Management actions and strategies to achieve desired water quality conditions identified in the Proposed RMP/Final EIS for the planning area will be conducted in conformance with various regulations in the CWA, the Colorado Water Quality Control Act, Colorado water quality standards and guidelines, and the FLPMA.
Water Resources	Form Letter #8	One of the major concerns regarding water quality and oil and gas development deals with “fracking.” Fracking deals with the desorption or release of methane gas from underground formations in order to allow for its collection. Collection occurs only when the pressure is sufficiently reduced by removing ground water from the formations. In an effort to increase the quantity of methane gas removed from formations, fluids are forced into the formation through a well at very high pressures to hydraulically fracture formations holding the gas in place. The porosity and permeability that makes many formations effective receptacles for methane gas also allows them to hold large quantities of ground water that often serve as important sources of irrigation as well as drinking water, for humans and farm and ranch animals. For instance, the water contained by the coal formation of the southeastern Powder River Basin in Wyoming is high-quality water that serves the domestic and agricultural needs of the region. Injecting hydraulic fracturing fluids into underground sources of water risks the permanent contamination of these methane wells in that the fracturing fluids being pumped into ground water are likely to contain toxic and carcinogenic chemicals. Very small quantities of toxic chemicals such as benzene are capable of contaminating millions of gallons of water and while much of the injected fracturing fluids are pumped	BLM is required to maintain water quality where it presently meets EPA-approved State of Colorado water quality standards and to improve water quality on public lands where it does not meet standards defined by Section 303(d) of the Clean Water Act. Management actions and strategies to achieve desired water quality conditions identified in the Proposed RMP/Final EIS for the planning area will be conducted in conformance with various regulations in the CWA, the Colorado Water Quality Control Act, Colorado water quality standards and guidelines, and the FLPMA.

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		out of the ground, 20% to 30% of the fluids may remain in the ground, continuing to contaminate underground water supplies for untold years. Until proven safe, all potentially toxic substances should be banned from hydraulic fracturing operations. •BLM must establish water-monitoring methods to determine if management decisions are adversely impacting underground and surface water supplies.	
Water Resources	Form Letter #8	BLM must halt and/or mitigate any use that adversely impacts air or water quality.	See General Comment Response #24
Water Resources	Juniper Water Conservancy District (through Romney Law Office)	b. Statewide Water Supply Initiative The Colorado River Water Conservation Board undertook a Statewide Water Supply Initiative ("SWSI") that produced a detailed report and executive summary which analyzes present and future water use within the State of Colorado by basin. Both the executive summary and full SWSI report are available at http://www.cwcb.state.co.us/swsi. The SWSI findings further support the conclusion that the water in the Yampa River needs to be diverted and developed and that it is in the public interest to allow such water uses. SWSI concludes that: 1. Significant increases in Colorado's population will intensify competition for water. 2. If Municipal (M) and Industrial (I) water projects and processes are not successfully implemented, Colorado will see a significant reduction in irrigated agricultural lands as M and I water providers acquire and transfer agricultural water rights. 3. Environmental and recreational uses of water are expected to increase with population growth. However, without a mechanism to fund environmental and recreational enhancement beyond the project mitigation measures required by law, conflicts among M and I, agricultural, recreational, and environmental users could intensify. SWSI projects that the population of the Yampa/White/Green River Basins (39,302 in 2000) will increase by 22,100 in 2030 to a total of 61,400. This is a 56% increase over that 30 year period. Associated with that population increase is a 22,300 acre foot increase (about 76% increase) in the need and consumptive use of water by the year 2030.	See General Comment Response #26
Water Resources	Moffat County Commissioners	p. ES 7 – Water Resources Moffat County requests clarifying that range improvements should be mentioned as benefiting water resources and should be allowed, case-by-case, within ¼ mile of a water resource. Range	The Proposed RMP/Final EIS has been revised to remove NGD and SSR stipulations from Alternative C. The RMP cannot note every potential exception for every management action. The decisions as

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		Improvements shouldn't be considered an Appendix M exception, but rather an allowed use. We request this comment be incorporated into p. 2-10, Water Resources, also.	contained in the Draft RMP/EIS provide for the protection of the resource, but also provide for flexibility on a case-by-case basis at the activity level.
Water Resources	Moffat County Commissioners	p.3-17 Water Resources Moffat County requests the House Bill 1177 Interbasin Compact process be discussed, especially as it impacts current water conditions.	The Draft RMP/EIS includes a specific reference to HB 1177 Interbasin Compact negotiations as part of the discussion of Impacts on Water Rights under a BLM Suitability Determination in chapter 4. In addition, a discussion of the Interbasin Compact process has been added to the wild and scenic river suitability analysis. Please see the Wild and Scenic River Appendix in the Proposed RMP/Final EIS for those revisions.
Water Resources	Questar, Rockies Region	Chapter 3 should define which streams are perennial.	Perennial streams would be identified at the activity level.
Water Resources	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.3.2 Management Actions – Water Resources (p.2-11): The preferred alternative states, “Establish NSO stipulations for up to 0.25 miles from perennial water sources, if necessary, depending on type and use of the water source, soil type, and slope steepness. Exceptions would be granted according to Appendix E.” Because all streams in the planning area are important to endangered fish either within the planning area or downstream of it, we urge BLM to change this management action to more simply state, “Establish NSO stipulations for 0.25 miles from perennial water sources.”	See General Comment Response #25
Water Resources	Tri-State Generation and Transmission Association, Inc.	The implications of the Wild and Scenic Rivers Act is that a federal reserved water right would be included in any designation language passed by Congress to insure the outstandingly remarkable features that warranted a designation would continue. In the discussion of the Act in the Draft EIS, no reference is made to this implied right, or the long-term impact requiring river flows sufficient to maintain these water-related values would have on agriculture, or senior or upstream water right owners. Please include such a discussion in the EIS at the appropriate locations, including the wild and scenic river study report, where suitability of the eligible segments will be discussed.	See General Comment Response #17
Water Resources	Tri-State Generation and Transmission Association, Inc.	Alternatively, should the BLM adopt Alternative A and continue interim wild and scenic river management pending a final suitability determination, Tri-State requests that the BLM include appropriate language in the Draft EIS to the effect that any such interim management of the eligible Yampa River segments shall be subject	See General Comment Response #22

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		to immediate consideration of a land use plan amendment by the BLM, if any Yampa River Basin water users seek to develop existing water rights pursuant to Colorado Water Court decrees.	
Water Resources	Tri-State Generation and Transmission Association, Inc.	Attached hereto as Exhibit A and incorporated herein by reference is a map of State of Colorado Water District Nos. 44, 54, 57 and 58, and a list of the decreed conditional water rights in those water divisions, all of which are located either within or upstream of the eligible Yampa River segments. Tri-State and/or the Yampa Participants own several of these listed conditional water rights, including the Craig Station Ditch and Pipeline, the Synthetic Products Ditch, water rights decreed for the Four Counties Project, the Yampa River Diversion, the Wessels Canal, and substantial storage interests in Stagecoach Reservoir, Yamcolo Reservoir, Elkhead Reservoir, Juniper Reservoir and California Park Reservoir - all of which are projected to be needed to meet future power demands both within and outside of the Yampa River Basin. A review of Colorado Water Court decrees associated with the rights listed in Exhibit A reveals that there exist literally hundreds of thousands of acre-feet of conditional water storage rights decreed on the Yampa River and its tributaries within or upstream of the potentially eligible segments, making the segments unsuitable at this time for interim wild and scenic river management, let alone permanent designation. The unsuitability of the Yampa River Basin segments based upon the existence of these rights will not change due to the outcome of the state water resource planning processes relied upon by the BLM as justification for not making a final suitability determination at this time. Thus, the BLM should reach the ultimate conclusion in the Draft EIS that none of the potentially eligible Yampa River segments is suitable for designation.	See General Comment Response #20
Water Resources	Tri-State Generation and Transmission Association, Inc.	A. Impacts to Existing Water Rights Must Be Analyzed in Detail: Discussed below is the BLM's failure to adequately analyze adverse impacts to vested Colorado water rights, particularly decreed conditional water rights in the Yampa River Basin, due to wild and scenic river management and/or designation; and the need for the BLM to conduct a more detailed analysis of adverse water rights impacts in the Draft EIS, which should lead to the ultimate conclusion by the BLM that the eligible Yampa River segments are neither suitable nor feasible to be managed and/or designated as wild and scenic rivers. In analyzing surface water resources, the Draft EIS states, in part, as follows:	See General Comment Response #20

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		There are no major reservoirs or impoundments on BLM-administered land in the [Resource Management Plan Planning Area]. Draft EIS at 3-18. While this statement may be true as to existing reservoirs which have been constructed to date, it is not true with respect to existing rights under Colorado water law to develop major reservoir sites in the future that may inundate lands under the BLM's jurisdiction or other federal lands. Many of the existing water rights in the Yampa River Basin are conditional in nature, which means that they are rights decreed by the Colorado Water Court to develop future water rights appropriations in the Basin.	
Water Resources	Tri-State Generation and Transmission Association, Inc.	There are certain statements in the Draft EIS which suggest that the BLM does not comprehend that these conditional water rights constitute valid existing rights under Colorado law. See, e.g., Draft EIS at 3-22 (stating that water rights acquired under Colorado law are "by actual diversion and application of water to beneficial use"). Although actual beneficial use of water is required in order to perfect or make "absolute" a Colorado water right, decrees may be obtained from the Colorado Water Court to develop future water rights appropriations which, if diligently completed, will possess a priority date relating back to the year in which the application for water right was filed with the Court. See Turkey Canon Ranch v. Shirola, 937 P.2d 739, 748 ("A decree does not confer, but rather confirms a pre-existing water right, or in the case of conditional appropriations, gives the applicant the right to obtain a priority date that relates back to the date of the first appropriation.").	See General Comment Response #17
Water Resources	Tri-State Generation and Transmission Association, Inc.	Tri-State believes that the BLM's water resources analysis in the Draft EIS does not adequately account for the existence of sizeable conditional water rights and the conflict they pose with respect to any wild and scenic river designation and/or management in the Yampa River Basin. As noted above, federal law requires the BLM to take into account "reasonably foreseeable potential uses of the land and related waters" at issue, 16 U.S.C. § 1275(a); and to analyze "potential conflicts with future uses and state or local interests in the river." Veneman, 335 F.3d at 853. When accounting for existing conditional water storage rights under these legal standards, the BLM's above-quoted statement must be qualified so that the BLM acknowledges the existing rights under Colorado law to construct massive reservoirs within each of the eligible Yampa River Segment Nos. 1, 2 and 3, as well as upstream of those segments. In particular, there are sizeable decreed conditional water storage	See General Comment Response #20

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		rights associated with the Juniper/Cross Mountain Projects, the primary beneficiary of which is the Juniper District. However, Tri-State and the Yampa Participants, as well as the Colorado River Water Conservation District and other Colorado water users, hold interests in conditional water rights decreed for these massive projects. For example, Tri-State and the Yampa Participants together own an 8,310 acre-foot interest in the conditional Juniper Reservoir water storage right, which is decreed for a total of 844,294 acre-feet of storage capacity in the Yampa River Basin. In total, the conditional water rights decreed for the Juniper/Cross Mountain Projects amount to over 1,000,000 acre-feet of future storage capacity in the Yampa River Basin. A list of the Juniper/Cross Mountain Projects' decreed water rights and a map showing the location of the Juniper Project are attached hereto as Exhibit B and incorporated herein by reference. While the dam for the Juniper Reservoir will be located below the Yampa River Segment No. 2, future development of that reservoir would inundate some or all of the Yampa River Segment Nos. 2 and 3. Similarly, future development of the Cross Mountain Reservoir Project would inundate the Yampa River Segment No. 1.	
Water Resources	Tri-State Generation and Transmission Association, Inc.	Section 4.3.3. of the Draft EIS purports to include a "discussion of effects on water rights and potential future water projects resulting from BLM [wild and scenic river] suitability determinations." Draft EIS at 4-24. In the view of Tri-State, however, such discussion is far too cursory and general in nature to adequately analyze such effects. The most extended and detailed discussion of water rights impacts that we could locate in the Draft EIS is the following: If a river segment is not yet designated by Congress, BLM involvement would be triggered only if the water right applicant required access to BLM lands for development of the water right. BLM involvement would also be triggered if the proposed water right would injure an existing BLM water right decreed for other purposes. In addition, BLM is obligated to not impair the free-flowing conditions of the segment by allowing major dams, diversion, rip-rap, and other water control infrastructure to be constructed in the river channel in the suitable segment. However, BLM would not be able to object to the proposed water right based on injury to outstandingly remarkable values. This occurs because BLM would have not yet quantified, via analytical studies, the precise amount of water needed to support the outstandingly remarkable values. The quantification process would occur after the segment is designated by Congress. Evidence of this approach is provided by BLM's	See General Comment Response #20

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		implementation of the 1989 RMP. Since that time, the BLM has not opposed any new applications for upstream water rights or water projects based on the need to protect outstandingly remarkable values in these segments. BLM has not participated in past water rights cases filed by the Colorado River District to prove diligence on the project, and BLM would not expect to do so in the future. The historic applications for reasonable diligence have never represented that BLM has given land use authorization for construction of the project, so BLM has never had a basis to object. Draft EIS at 4-29. In the third paragraph quoted above, the BLM appears to make a vague reference to the existence of the Juniper/Cross Mountain Projects' water rights. This sort of implied acknowledgment, assuming that it does indeed relate to the Juniper/Cross Mountain Projects' water rights, is not of adequate specificity to discharge the BLM's planning duties under federal law. The BLM must acknowledge in the Draft EIS that development of the Juniper/Cross Mountain Projects would be foreclosed by wild and scenic river designation, by virtue of the fact that federal approval to construct such projects on federal lands would be precluded due to potential injury to the outstandingly remarkable values and the free-flowing nature of the eligible Yampa River segments.	
Water Resources	Tri-State Generation and Transmission Association, Inc.	B. Water Rights Analysis Must Address Foreseeable and Cumulative Impacts: Current conditions applicable to water resources are analyzed in section 3.1.4. of the Draft EIS, in which the BLM generally acknowledges the "scarcity of water" in this region of the country and the trend towards "larger and more consistent quantities of water and a greater number of water sources [being] in demand." Draft EIS at 3-22. The BLM further acknowledges that drought conditions currently prevail in the region, which might necessitate "constructing additional water developments in locations where surface water sources become inadequate to satisfy all projected uses." Id. Although these general acknowledgments are true, the analysis of impacts upon water resources set forth in section 4.3.3. of the Draft EIS does not adequately address, as discussed above, the large number of existing water rights that remain to be developed to meet growing water demands in the Yampa River Basin. The BLM's Draft EIS should take notice of the results of the Statewide Water Supply Initiative ("SWSI") prepared by the Colorado Water Conservation Board, the executive summary of which can be viewed at	See General Comment Response #26

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		www.ewcb.state.co.us/swsi.com. To summarize, the SWSI study indicates that Colorado will experience significant future increases in population which will increase competition for scarce water resources; and that if there is not sufficient new water projects to meet projected municipal and industrial water demands, then Colorado will experience a significant reduction in irrigated agricultural lands as demands for additional water sources will lead to an increased transfer of agricultural lands out of production and the change of associated agricultural water rights to municipal and industrial uses. The SWSI study projects that the human population of the Yampa/White/Green River Basins will increase by 56% over the next 30 years, along with a projected 76% increase in water demands and consumptive use over that period. Under the legal authority discussed above, wild and scenic river designation and/or management will likely cause adverse effects to the ability to implement existing conditional water rights to meet growing municipal and industrial water demands in the Yampa River Basin.	
Water Resources	Tri-State Generation and Transmission Association, Inc.	Accordingly, in lieu of adopting Alternative B, Tri-State would support the BLM's wild and scenic river Alternative A, but only on condition that additional protective language were included in the Draft EIS under which the BLM would agree to immediately reconsider and seek amendment of its land use plan in the event that any Colorado water users, including, without limitation, Tri-State and the Yampa Participants, were to seek to develop decreed water rights in the Yampa River Basin for which BLM consent would be required.	See General Comment Response #22
Water Resources	Tri-State Generation and Transmission Association, Inc.	The implications of the Wild and Scenic Rivers Act (Act) regarding water is that a federal reserved water right would be included in any designation language passed by Congress to insure the outstandingly remarkable features that warranted a designation would continue. In the discussion in the DRMP about the Act, no reference is made to this implied right, nor the long term impact requiring river flows sufficient to maintain these water-related values would have on agriculture, or senior or upstream water right owners. Please include such a discussion in the PRMP at the appropriate locations, including the wild and scenic river study report, where suitability of the eligible segments will be discussed.	See General Comment Response #17
Water Resources	Tri-State Generation and Transmission Association, Inc.	The BLM has failed to acknowledge or assess the extent to which sizeable decreed conditional water storage rights on the Yampa River and its tributaries may be foreclosed or curtailed from future development or otherwise adversely affected were those segments designated as wild and scenic rivers. These conditional rights have	See General Comment Response #20

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		been decreed by the Colorado Water Court and are considered vested water rights under Colorado law. Many of these water rights have been appropriated by Colorado water users, including Tri-State and the Yampa Participants, to provide projected water supplies when water demands increase in the future. Many of these conditional water rights are also located upstream of the eligible Yampa River segments and will divert and impound substantial amounts of water in the future that otherwise would have continued to flow freely down the Yampa River. The future use of these vested conditional water rights is plainly foreseeable and must be specifically acknowledged and analyzed by the BLM in the Draft EIS. When properly doing so, the BLM should reach the ultimate conclusion in the Draft EIS that the existence of these water rights makes the eligible Yampa River segments unsuitable for wild and scenic river designation.	
Water Resources	Vermillion Ranch Limited Partnership	Pg ES-7 Water resources NSO and NGD must not apply to range improvements	See General Comment Response #23
Water Resources	Vermillion Ranch Limited Partnership	Pg 2-11 2.5.3.2 as written there is a negative effect of NSO on range improvements and that is in direct conflict with maintaining sustainable ranching goals. NSO must not negatively impact range improvements or ag sustainability	See General Comment Response #23
Water Resources	Wilderness Society (The), et. al.	BLM should proactively manage both the quality and quantity of water resources. The Draft RMP sets resource goals and objectives for both water quality and quantity. Draft RMP, pp. 2-10 – 2-11. These goals and objectives, however, are vague in that they defer to BMPs as a means of protecting water quality and quantity, yet no list of BMPs is provided and implementation of BMPs is not mandated for specific activities. Further, NSO stipulations within .25 miles from perennial streams are only applied in certain situations and are waivable (Draft RMP, p. 2-11). While BLM analyzes and acknowledges that surface disturbing activities including fluid mineral development and ORVs will have negative impacts on water resources (Draft RMP, p. 4-28), BLM failed to analyze the impact to ground and surface water quality and quantity caused by potential oil shale development. The omission of an analysis of impacts to water resources from oil shale development, along with BLM's failure to choose Alternative D which would, "provide the most protection to water resources" (Draft RMP, p. 4-29) is particularly disturbing given that, "The data on cumulative departure from mean flow indicate that the RMPPA has been experiencing a drought since early 2000." Draft RMP, p 3-22). The Draft RMP's analysis of	BMPs are those land and resource management techniques determined to be the most effective and practical means of maximizing beneficial results and minimizing conflicts and negative environmental impacts from management actions. BMPs are not one-size-fits-all solutions. BMPs should be selected and adapted through interdisciplinary analysis to determine which management practices are necessary to meet the goals and objectives of the RMP. The best practices and mitigation measures for a particular site are evaluated through the site-specific NEPA process and vary to accommodate unique, site-specific conditions and local resource conditions. BMPs are selected and implemented as necessary, based on site-specific conditions, to meet resource objectives for specific management actions. Adjustments to BMPs can be made as necessary to ensure that RMP goals and objectives are being met as well as to conform to changes in BLM regulations,

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		potential impacts to water resources and its reliance on best management practices as mitigation measures do not meet NEPA's standards.	policy, and direction or new scientific information. In relation to oil shale, in November 2008, BLM finalized its NEPA document associated with oil shale and tar sands with publication of the Approved RMP Amendments/ROD for Oil Shale and Tar Sands Resources to Address Land Use Allocations in Colorado, Utah, and Wyoming and Final Programmatic Environmental Impact Statement. The PEIS amended 12 BLM land use plans to describe the most geologically prospective areas administered by BLM where oil shale and tar sands resources are present, and to identify areas that will be open to application for commercial leasing, exploration and development. The study area for that process did not include the Little Snake Field Office and the 1989 Little Snake RMP was not addressed or amended. As there are oil shale resources within the RMPPA, the Draft RMP/EIS included decisions to manage those resources. The Proposed RMP/Final EIS was revised to add language to clarify management of oil shale leasing. Specifically, this language notes that BLM will consider leasing oil shale, but that "future oil shale leasing would require additional NEPA analysis, as well as a Plan Amendment. This additional NEPA analysis could preclude development." Given that the chapter 2 action is that oil shale development could occur, but would be preceded by additional NEPA analyses, there is no specific decision or potential to develop oil shale from the decisions in chapter 2 of the Proposed RMP/Final EIS. Therefore, no analysis is possible for impacts to water quality or quantity from oil shale development.
Water Resources	Wilderness Society (The), et. al.	Water quality standards are typically composed of numeric standards, narrative standards, designated uses, and an anti-degradation policy. The Draft Plan, however, only considers numeric standards as "water quality standards." That narrow view is incorrect. The Supreme Court held in PUD No. 1 of Jefferson County v. Washington Dep't of Ecology, 511 U.S. 700 (1994), that all components of water quality standards are enforceable limits. Consequently, the RMP must outline not only the ways in which BLM will meet or exceed the numeric standards, but also how it will	In addition to regulatory requirements associated with water quality (numeric standards), the Draft RMP/EIS includes a commitment to several narrative standards related to water quality and quantity. For example, one of the objectives to meet water goal B is to achieve proper functioning condition in existing riparian/wetland systems that do not meet land health and water quality standards. This and other narrative standards are actually more prevalent than

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		manage its lands to ensure that the State's anti-degradation policy is complied with. Adopting this legally sanctioned view of water quality standards is important. For example, a typical designated use for a stream might state that the stream is "protected for cold water species of game fish and other cold water aquatic life, including necessary organisms in their food chain." Designated uses of this sort encompass a far more holistic, ecosystem-based view than focusing on, say, the concentration of chloride in the stream (a numeric standard). While Table 3-7 (Draft RMP) is a good start, over one half of the Landscape Assessment Units have not been analyzed. Consequently, the RMP should provide that designated uses be fully achieved, and if they are not, require prompt management changes even if numeric standards are otherwise being met. Similarly, BLM should develop and commit to an active monitoring protocol to ensure that not only numeric standards are being met, but also develop their monitoring protocol to take into account narrative standards as well.	numeric standards for water quality in chapter 2 of the Draft RMP/EIS. While there is a regulatory requirement to meet Clean Water Act standards on public lands, including requiring permitted activities minimize erosion and stream sedimentation, much of what the Draft RMP/EIS requires is narrative based. The Proposed RMP/Final EIS has been updated with the most recent Landscape Assessments. Identification of monitoring protocols and methodologies is not a land use plan decision. Identifying monitoring and assessment methods will be done during activity-level planning.
Water Resources	Wilderness Society (The), et. al.	In addition to the anti-degradation policy's protections for waters that are meeting water quality standards, where State water quality standards have not been achieved despite implementation of point source pollution controls, section 303(d) of the CWA requires a State to develop a list of those still-impaired waters, with a priority ranking, and to set total maximum daily loads (TMDLs) of pollutants for the stream "at a level necessary to implement the applicable water quality standards…" 33 U.S.C. §1313(d)(1)(C). Consequently, to the extent waters within the BLM's jurisdiction have been identified as water quality impaired segments, or contribute stream flow to such segments, the Proposed Plan should include affirmative steps toward reducing that impaired status. If any specific load allocation has been made by the State for activities on BLM lands, BLM should ensure that all activities are in compliance.	Identifying specific actions to reduce the impaired status of specific waters is not an RMP-level decision. Over the course of implementing the RMP, the 303(d) list will be updated several times. There is a high potential that any specific actions to address impaired waters would quickly become obsolete and no longer useful. Management to address waters on the 303(d) list, including those where water quality standards have not been met even following initial efforts, are best addressed on a case-by-case basis to ensure the management is targeted to the specific situations for each impaired water body. BLM ensures all activities are in compliance with the Clean Water Act on a case-by-case basis, adapting the management requirements depending on where the given projects are located and on the nature of the proposed activity on public lands.
Water Resources	Wilderness Society (The), et. al.	The Proposed Plan should also ensure full compliance with sections 401 and 404 of the CWA. Section 401 requires State certification of compliance with State water quality standards prior to authorization of certain actions on BLM lands. 33 U.S.C. § 1341. Section 404 requires permits before discharges of dredged or fill material can be made into navigable waters, and BLM, through the Proposed Plan, should assist the EPA and Army Corps of Engineers with	In the same vein that the RMP could not waive BLM adherence to legal and regulatory requirements, the RMP does not need to specifically state that BLM will comply with the Clean Water Act. BLM will comply with all legal and regulatory requirements associated with the management of public lands and environmental resources, including working with the

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		implementation and enforcement of this requirement, which, of course, is a powerful means for the protection of wetlands. See 33 U.S.C. § 1344.	appropriate regulatory State and federal agencies that are responsible to ensuring compliance with the various laws.
Water Resources	Yates Petroleum Corporation (through agent)	There is a much closer correlation to spring snow moisture than to oil and gas development (See Renee Taylor comments)Yates also finds the policy of a general NSO or NDG ¼ mile from a perennial stream to be excessive. The Criteria in Appendix E are so vague that it is not possible to determine under what circumstance exceptions would be granted. There are currently setback for pits and pads as well as requirements from the U.S. Corps of Engineers concerning wetlands for locations, pipelines and roads. There are also protections by SPCC plans, and Storm Water Plans. Yates has no problem with certain areas of specific viewshed or other special resource protections, but the sweeping generalization of the ¼ mile is excessive without analysis for basis.	See General Comment Response #25
Water Resources	Yates Petroleum Corporation (through agent)	Appendix B. There are several statements in this document that are encroaching on the State of Colorado's' primacy over water as granted from the EPA through the Clean Water Act. Statements such as "Discontinue the use of diesel fuel in hydraulic fracturing fluids injected directly into formations that contain USDW." are unnecessary. The Clean Water Act clearly protects USDWs. Also crossing wetlands and riparian areas is covered by Nation Wide permits from the U. S. Army Corps of Engineers. BLM has no authority over surface or groundwater. Plans can only require that an operator state that they have the required permits from the appropriate agency(s).	See General Comment Response #24
Wild and Scenic Rivers	Barbara Banke	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Michael Bartell	- Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Mark Bartleman	And I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Joan Bossart	addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Sheila Bruggen	- Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Ann & Bill Burton	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and	Carla Caccia	Please also protect all five eligible Wild and Scenic river segments	See General Comment Response #27

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Scenic Rivers		of the Yampa River, Vermillion Creek and Beaver Creek.	
Wild and Scenic Rivers	Erin Campion	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Burt Clements	I am opposed to any Wild and Scenic designation of the Yampa River. We went through this already once. It will put a burden on the water users and undue stress on the adjoining land owners upstream and downstream. It will put more restrictions on the sportsmen we don't need that.	See General Comment Response #28
Wild and Scenic Rivers	Colorado River Water Conservation District	The River District, as a water agency charged with conservation, use and development of the water resources of the State of Colorado, is primarily concerned with the potential designation of five segments (three Yampa River segments, Vermillion Creek and Beaver Creek) as Wild and Scenic pursuant to the Wild and Scenic River Act (WSRA). As you probably know, designation of rivers in Colorado as Wild and Scenic is often contentious due to potential impacts to water rights, supplies and facilities. Our concern is that designation pursuant to WSRA is too stringent and restrictive in its requirements, thereby reducing flexibility to meet future water demands in Colorado. The Colorado General Assembly and the State's water users have spent a great deal of time and money building flexibility into Colorado's water law system. As most of the State's river systems are already over-appropriated (meaning there are more demands than supplies), we cannot afford to lose flexibility in the system. Therefore, we recommend that the BLM select Alternative B, finding that none of the potentially eligible segments is suitable to be designated or managed pursuant to the WSRA.	See General Comment Response #18
Wild and Scenic Rivers	Colorado River Water Conservation District	The analyses of the impacts associated with the Wild and Scenic designation of five river segments in the Yampa River Basin, including the impacts to water rights, is inadequate for the purposes of both the BLM's guidance and NEPA.	See General Comment Response #30
Wild and Scenic Rivers	Colorado River Water Conservation District	In addition, if the reservoirs were constructed to meet future water demands pursuant to existing water rights and the on-going planning processes mentioned above, the reservoirs would inundate the proposed Yampa River segments, thereby frustrating the BLM's goal of protecting the ORVs in those proposed segments. Consequently, the River District does not believe these segments are suitable because the proposed reservoirs and protection of the ORVs are mutually exclusive.	See General Comment Response #19
Wild and Scenic Rivers	Colorado River Water	The River District does not believe that the proposed segments are suitable for designation because they fail to meet five of the criteria	See General Comment Response #28

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	Conservation District	in BLM's 8351 Manual. The BLM does not have jurisdictional control over all the lands, which will make it difficult to manage as Wild and Scenic. BLM 8351.33 (A)(2). The reasonably foreseeable potential use of the land and related waters includes two reservoirs (Juniper and Cross Mountain). BLM 8351.33 (A)(3). These uses would be foreclosed if the Yampa River segments were designated as Wild and Scenic because the uses are mutually exclusive to the goal of protecting the ORVs. There is significant opposition to designation of any segments as Wild and Scenic in the Yampa River basin. BLM 8351.33 (A)(4). Finally, the BLM's Manual considers whether there are other mechanisms available to protect the segment. The SWSI and HB 1177 processes described above will work to address non-consumptive water needs as well as consumptive needs. C.R.S. /i 37 - 75-104(2)(c). The goal of the HB 11 77 process is to find mutually beneficial solutions to both its consumptive and non-consumptive needs. Designation of segments in the Yampa River would preempt that process, contrary to BLM's own guidance and FLPMA. BLM 8351 and 43 U.S.C. 3 1712(c)(9).	
Wild and Scenic Rivers	Colorado Whitewater	The BLM's preferred alternative does not protect all five of the resource area's eligible Wild and Scenic River segments. Beaver Creek and Vermillion Creek are not designated as "suitable" and thus will not be protected. The three Yampa River segments are open to oil and gas leasing. The BLM should preserve all exceptional stretches of the Yampa River, Vermillion Creek, and Beaver Creek to protect their wild characteristics, renowned rafting and recreation opportunities, and critical habitat for endangered fish species. Designate as "suitable" all five eligible Wild and Scenic River segments on the Yampa River, Vermillion Creek, and Beaver Creek because of their Outstandingly Remarkable Values. Protect all five WSR segments by closing them to oil and gas development.	See General Comment Response #27
Wild and Scenic Rivers	Andrea Cousins	-Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Jennifer DiMeo	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Margarita & Steven Downs	2. Impose No Surface Occupancy (NSO) Lease Terms on all lease areas where your Wild and Scenic River Review Process has not been completed. Obviously, degradation of surface water resources can extend beyond a particular lease site and since we live in a semi-arid region, the specter of contamination of our water resources, both from lease site development siltation and potential	The entire wild and scenic river review process will be completed during the RMP development process, including evaluation and analysis for both eligibility and suitability, as well as developing management to protect the tentative classifications, free-flowing nature, and outstandingly remarkable values. After

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		chemical contamination needs to be prevented BEFORE it occurs.	eligibility determinations are made, BLM must protect the ORVs and free flowing nature of the eligible segments until suitability determinations are finalized in the Record of Decision. The Proposed RMP/Final EIS has been revised to include a complete suitability analysis in the wild and scenic rivers evaluation appendix. Management for proposed wild and scenic river segments, by alternative, is contained in chapter 2 of the Draft RMP/EIS, which includes Alternative D, which considered closing all eligible river segments to oil and gas leasing.
Wild and Scenic Rivers	Robert A. Evangelista	Urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Form Letter #2	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Form Letter #8	The Yampa River runs for 172 miles through Routt and Moffat Counties and is one of the most biologically and hydrologically intact rivers in the West. It supports a diversity of native aquatic communities (including four federally listed fish species: Colorado River pike minnow, humpback chub, bonytail chub, and razorback sucker), as well as and significant reaches of globally rare riparian plant communities. Additionally, the Yampa River is an important recreational fixture for the area, providing amazing float and whitewater boating opportunities as it flows through the Yampa River and Cross Mountain Citizens' Wilderness Proposals. The segments of the Yampa River that BLM must manage to protect their Wild and Scenic character are the Williams Fork to Milk Creek segment, Milk Creek to Duffy Tunnel and Cross Mountain. Each of these segments possesses a number of Outstandingly Remarkable Values. Both the Williams Fork to Milk Creek and Milk Creek to Duffy Tunnel segments enjoy Outstandingly Remarkable Values for critical habitat for endangered fish species (Colorado Pikeminnow) and amazing float-boating opportunities that are regionally significant. The Cross Mountain Canyon segment possesses some of the most unique geological, recreational and scenic values in the region. The world-class whitewater recreation opportunities of Cross Mountain attract visitors from around the country. In addition to the Yampa, both Beaver Creek and Vermillion Creek possess Outstandingly Remarkable Value's found nowhere else in the region. Beaver Creek is home to one of the purest strains of Colorado Cutthroat Trout in the region and Vermillion Creek is	See General Comment Response #27

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		surrounded by some of the area's most amazing cultural resources. These eligible waterways should be managed to protect their Wild and Scenic characteristics that we feel should be preserved for current and future generations.	
Wild and Scenic Rivers	Charles Garvin	- Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Rick Hammel	Wild and Scenic Rivers Page 2-41 Alternative D is our choice specifically Beaver Creek. Its headwaters is a spring on private property (Raftopolous) and goes into another private holding (Vermillion Ranch). Then it flows into Colorado State Land Board property, before it enters public land; it then flow down a canyon enters Utah. As Beaver creek leaves the canyon and Utah, it enters private land (Vermillion). The stream then flow through various ownership to where it ends at the Green River. 1. Beaver Creek contains a viable population of 95%, or better, of Colorado River cutthroat trout (CRCT) (DOW, 2000). These trout must be protected as a BLM sensitive species. 2. Livestock activity goes on upstream of the State Land Board property that borders BLM land to the north. 3. Livestock has been moved historically through the narrow canyon in which Beaver Creek flows. 4. There is nothing to prevent livestock from going into the water and fouling that portion of the stream and its bed. Moreover, the trampling of macro invertebrates removes a large amount of forage for the fish. The predominate macro invertebrates are scuds, caddis, craneflies, midges, water beetles and mayflies. (Vinson, Mark. National Aquatic Monitoring Center, 2000) 5. The CRCT is a species at risk. It has been petitioned for inclusion on the ESA list. While it was rejected because of a number of conservation actions occurring in Colorado Wyoming and Utah, it still needs the protection afforded as a NWSR. 6. In summary, Beaver Creek is a wild water course. There is a cow trail along side of it that is used by local ranchers. It is bordered by State Lands at the north private property southern end. Because of the wildness of both the creek and surrounding lands, we strongly recommend that Beaver Creek be included in the National Wild and Scenic River System	See General Comment Response #27
Wild and Scenic Rivers	Janet Hansen	- Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27

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Wild and Scenic Rivers	Lois Harris	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Arlene Hoffman	-protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Howard County Bird Club	We support protection of five river segments BLM found eligible for Wild and Scenic River status on the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Barbara Hughes	Protect all 5 eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Bill Israel	Please protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	Previously, Juniper commented upon the suitability of designation when there were significant private property ownership of the land crossed by Segments 1 and 2. Juniper would like to provide additional comment on the lack of suitability of such segments across private property. There are three segments portions of the designated segments of the Yampa River which flow across privately owned property on both sides of the river. These segments are not suitable for designation since the property owners could legally restrict the management of these segments as a Wild and Scenic River, as defined. For example, private property owners in Colorado have the right to prevent by civil action the floating of the river across their private property. See People v. Emmert, 198 Colo. 137, 597 P.2d 1025 (1979). See also, Article by John Hill, The "Right" to Float through Private Property in Colorado: Dispelling the Myth, 4 U. Denv. L. Rev. 331 (2001); cf. Article Legal Underpinnings of the Right to Float Through Private Property in Colorado: A Reply to John Hill, 5 U. Denv. L. Rev 457 (2002). There is not "right to float" across private property under Colorado law, even if the floaters abstain from touching the river banks or bed. See Emmert. Additionally, there is no established right to float the Yampa River under federal law. See John Hill Article. Such actions by private property owners to restrict recreational floating of the Yampa River across their private property would make the management of these segments for the Outstanding Recreations Values, particularly Segments 1 and 2, to be difficult if not impossible. There are three parcels of privately-owned land that Segments 1 and 2 cross: These parcels are spread out such that at	See General Comment Response #43

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		approximately every mile-and-a-half or two miles of Segments 1 and 2, private property owners would have the ability to prevent the floating of the river. These private property rights affect the suitability of recommendation for designation of Segments 1 and 2 of the Yampa River.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	In the BLM response to Juniper's previous comment regarding private property ownership, the BLM stated: Under the Wild & Scenic Rivers Act, compliance with management plans is strictly voluntary for private landowners, unless local governments choose to create zoning ordinances that implement protective measures. (Letter dated November 8, 2006, from John E. Husband, Field Manager, Little Snake Field Office to Sherman Romney.) This statement by the BLM that compliance with management plans is strictly voluntary by private property owners proves the lack of suitability of these segments where the rivers cross private property, such as in the case of Segments 1 and 2 of the Yampa River. Furthermore, after some investigation Juniper firmly believes that such property owners may wish to assert their private property rights and are inclined to prevent floating of the river across their property if the Segments 1 and 2 are recommended for designation under the Plan.	See General Comment Response #43
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	Recommendation of designation of segments would interfere with current and future development of existing water rights. Our previous comments involved significant claims involving Colorado water law and the effect of proposed recommendation for designation upon existing established water rights. We included an extensive listing of water rights holders, including conditional rights held by Juniper, which would be senior and superior to any use of the water as contemplated under the Wild and Scenic River Act. Specifically Juniper, joined by other state and local agencies, stated that the designations would affect future use and development of the existing water rights for municipal, industrial and agricultural growth in the Yampa Valley. Furthermore, the recommendation of recommendation under the preferred alternative would interfere with major planning efforts currently underway to address reasonably foreseeable statewide water uses. In particular, under the Colorado Water for the 21S` Century Act (HB 1177) state and regional boards established by the Act will identify and agree on interbasin storage and transfer projects to address projected water shortages among municipalities on the	See General Comment Response #18

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		Front Range. The BLM cannot adopt a river classification that impairs or would impede existing state-recognized water rights, whether developed or not developed. Juniper was organized for the purpose of constructing two major water projects. While these projects have not yet been constructed, there are major vested interests in water rights to fill such projects which Juniper holds. These water rights are primarily conditional water rights, which are valid water rights under Colorado law. The recommendations of designation under the Plan would effective destroy the rights held by Juniper. This is a prime example of the effect of the recommendations upon existing water rights.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	The vested and valid water rights prove that these segments cannot be managed as free-flowing due to the rights of diversion and storage associated with these water rights. These comments also show that none of the segments should be in the RMP preferred alternative, because they do not meet the suitability criteria in DM 8351 Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, and Management (1993). The Yampa River segments are not suitable due to vested and valid water rights, the lack of federal ownership of water and land, and the irreconcilable conflicts with state and regional agency programs, plans, and policies, due to the planned water storage and diversion projects, and the possible need for interbasin transfers.	See General Comment Response #19
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	The WSRA study process needs to involve all of the state and regional water agencies, consider all of the vested and conditional water rights, as well as the water uses, plans, and programs affecting the Yampa River Basin. Because future water projects use absolute and conditional water rights (both of which are property rights), BLM lacks the authority to use a WSRA study to frustrate the state and local government plans and indeed has a legal obligation to ensure that the RMP, of which the WSRA study is a part, is consistent with the plans of state, tribal and local governments. The existing water rights and associated projects and plans cannot be reconciled with proposed WSRA classifications and, thus, the RMP needs to incorporate these plans and programs into the RMP and adopt land use that is consistent.	See General Comment Response #30
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law	The JWCD bases this recommendation on the fact that vested water rights fully appropriate the water in the Yampa River and the scope of the legal rights associated with these water rights precludes a finding that the river is in fact "free-flowing." The Yampa River	See General Comment Response #18

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	Office)	segments do not meet the BLM suitability criteria, due to non-federal ownership of the water rights and the adjacent land, state and local agency water development plans, and the opposition of the affected state and regional agencies to a land use classification that would prohibit construction within the river segment corridor and would interfere with diversions of water from the river. The proposed WSRA classifications and resulting management irreconcilably conflict with several state and local agency plans, programs and policies and the classifications do not satisfy BLM's statutory obligation to ensure that its land use plan is consistent with state and other local government plans, programs, and policies.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	2. Reasonably Foreseeable Uses of Land and Water, DM 8351.33 ¶A.3 1. Free-flowing Finding Flawed BLM concludes that the recommended Yampa River segments are "free-flowing," which means a river or segment that is "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway…" 16 U.S.C. § 1286(b); DM 8351.31 ¶A, B. It is also understood that the WSRA classification precludes future construction, diversion, or impoundment of waters and calls for claims to instream flows. DM 8351.51 ¶IIA, B. The respective Yampa River segments are fully appropriated. The Yampa River, both in the proposed stream segments and upstream of the proposed Yampa stream segments, is subject to many vested water rights, both absolute and conditional. A complete listing of those water rights can be viewed at http://water.state.co.us/pubs/tabulation.asp by clicking on the Division 6 data for the Official July 1, 2004 Water Rights Tabulation. The state water tabulation demonstrates that there are literally thousands of vested absolute and conditional water rights (both for direct diversion and for storage) that would be affected by these classifications and which call for significantly different analysis regarding the free-flowing character. The owners of these water rights are entitled to divert or impound the water for beneficial uses, to change the point of diversion and the uses, and to enlarge upon those rights if contemplated at the time of the original appropriation. Green v. Chaffee Ditch Co., 150 Colo. 91, 371 P.2d 775 (1962).2. The eligibility study considers only current flows and ignores both the vested and conditional water rights, the exercise of which will change the character of the river.	See General Comment Response #19

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		Any proposed WSRA river classification is subject to all valid existing rights. 16 U.S.C. § 1283(b), 1284(f); 43 U.S.C. §1701 n. §§701(a), n.701(h); DM 8351.32,1IC; 8351.33, ¶A.11; BLM cannot deny or extinguish these rights. Nor can BLM regulate state water rights. Nonreserved Water Rights-United States Compliance with State Law, 88 Interior Dec. 1055, 1058 (1981) citing California v. United States, 438 U.S. 645, 654 (1978); United States v. New Mexico, 438 U.S. 696, 702 (1978) (holding that BLM is subject to state water laws and the states control this regulatory field). Thus, the fact that the diversion and storage structures are not currently built does not diminish the scope of the water right for purposes of what is a valid existing right to which any WSRA classification would be subject. The RMP eligibility study should be revised to calculate the effects of these water rights on flows.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	2. Streamflow Data Attached as Exhibit F is a map showing the location of two gauges, one below the Yampa segments (at Maybell) and one on the Yampa just below Craig above the Yampa segments. The exhibits show the USGS Streamflow data by month for the years of record that exist. A review of this data indicates that the Yampa River at Maybell, in drought years such as 1954 to 1956, 1977, and 2002, shows very little flow during the late irrigation season. In fact, in August 2002, the average monthly flow at Maybell was only 12.7 cfs. The Yampa River Below Craig gauge, for which fewer years are available, also demonstrates that in 2002 the flow in the Yampa was minimal at best during the late irrigation season, reaching a low of 25.2 cfs in August. Those who observed the Yampa during the drought of 2002 know that the Yampa was dry in many locations, particularly below the larger agricultural diversions.	This information was considered during the Little Snake Field Office review of potential eligible rivers for the identification of outstandingly remarkable values. An evaluation of each river is provided in Appendix D along with a more thorough discussion of how eligibility and suitability considerations are applied to each river.
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	3. Neither "rare" nor "unusual" The BLM WSRA eligibility criteria also require that the river segments be "rare" and "unusual." DM 8351.31 ¶B.3. The Yampa River, Segments 1 and 2, do not contain qualities that would distinguish them from any other segments of the Yampa River or other similar rivers in the region. The only distinguishing characteristic appears to be less private land ownership, which is not an outstanding value. As the eligibility study notes, most of the land along the Yampa River is privately owned.	This information was considered during the Little Snake Field Office review of potential eligible rivers for the identification of outstandingly remarkable values. An evaluation of each river is provided in Appendix D along with a more thorough discussion of how eligibility and suitability considerations are applied to each river.
Wild and Scenic Rivers	Juniper Water Conservancy District (through	C. Proposed Segments Do Not Meet Suitability Criteria The suitability analysis for a proposed WSRA segment must consider 13 factors. DM 8351.33, ¶A. Of the 13 factors, none of the	See General Comment Response #43

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	Romney Law Office)	Yampa River segments meets six of the 13 suitability criteria: (1) ownership and jurisdictional considerations, DM 8351.33 ¶A.2; (2) reasonably foreseeable potential uses of the land in the corridor and the water that would be affected, Id ¶A.3; (3) "Federal, state, local, tribal, or other interests in designation or nondesignation of the river," Id. A.5;, as well as the lack of support from the state's congressional delegation, Id. ¶A.10; (4) "Historical or existing rights which could be adversely affected," since BLM must afford protection for valid existing rights ; Id ¶A. 11; and (5) "The consistency of designation with other agency plans, programs or policies and in meeting regional objectives." Id. A.12. Since the proposed Yampa River segments do not meet the above criteria, the preferred alternative must exclude all of the segments.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	1. Ownership and Jurisdiction Considerations, DM 8351.33 ¶A.2 Over one-third of the adjoining property for Segment 1 and one-eighth of Segment 2 is privately owned. A classification under WSRA is limited to public land. DM-8351.06, ¶B; 8351.32, TB. The private land adjacent to Segment 1 limits or bars public access and Segment 2 cannot be effectively managed due to private lands within the segment corridor.	See General Comment Response #43
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	Equally important, BLM does not own the water within the river and lacks jurisdiction to regulate the exercise of these water rights. California v. United States, 438 U.S. 645, 654 (1978); Sierra Club v. Andrus, 487 F. Supp. 443 (D. D.C. 1980) (rejecting proposed doctrine of nonreserved rights for public lands). Nor can BLM file a claim for instream flows, as required in the manual, DM 8351.51, ¶¶A.2.i, B.2.k, C.2.i, since that authority is vested exclusively in the Colorado Water Conservation Board. C.R.S. §37-92-102(3);Thornton v. Bijou Irrig. Co., 926 P.2d 1, 94 (Colo. 1996). Even if the Board agreed to claim instream flows and such flows were available, they would be so junior as to be of limited, if any, value. Thus, it is impossible for BLM to maintain streamflows, because the water is fully appropriated. The WSRA classification by BLM does not create a reserved water right under the WSRA, because congressional designation is necessary. Federal Water Rights of the National Park Service, Fish and Wildlife Service, Bureau of Reclamation and the Bureau of Land Management, 86 Interior Dec. 553, 608 (1979). The public lands do not have any reserved water rights, since the public domain by definition is not a reservation. Nonreserved Water Rights-United States Compliance with State Law, 88 Interior Dec. at 1056-57 (amending the 1979 opinion to eliminate the theory of non-reserved	See General Comment Response #19

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		water rights for public domain lands).	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	2. Reasonably Foreseeable Uses of Land and Water, DM 8351.33 ¶A.3 a. Juniper/ Cross Mountain Projects: The proposed WSRA classifications of the Yampa River segments directly conflict with the development of Juniper and Cross Mountain Projects. The Juniper Water Conservancy District was created to be the beneficiary of the Juniper/Cross Mountain Projects when built. The water rights for the Juniper/Cross Mountain Projects, a list of which is attached hereto as Exhibit D, are valid, vested water rights that are held by the Colorado River Water Conservation District. The Juniper/Cross Mountain Projects are major water resource projects that will store over 1,000,000 acre feet of water, as well as direct flow rights. Attached as Exhibit E are two maps that show the location of the Juniper Project. The Juniper dam is located below Segment 2, but would inundate all of the Segments 2 and 3 on the Yampa. The Cross Mountain Reservoir Project would involve the inundation of Segment 1 of the proposed Yampa WSRA segments. Should Congress designate a stream segment for the WSRA system, federal assistance to upstream and downstream development is prohibited, if a water resource will "invade" a wild and scenic river segment or "diminish" the outstanding resource values ("ORVs") present in the designated segment. 16 U.S.C. § 1278(b)(iii). Moreover, a water resource project is defined as any "dredge and fill resource project or activity that required a federal permit." See generally, 30 U.S.C. §1344(d); 33 C.F.R. Part 323. As part of its land use planning and study, BLM can only exercise the power delegated by Congress, which is to study potential river segments not previously identified. 16 U.S.C. §1286. Federal law does not authorize BLM to supersede a state or local government water project by adopting WSRA classifications that conflict with planned projects and valid rights. 43 U.S.C. §1701, n. §§ 701(a);701(g)(2); 701(h). Indeed, FLPMA actually requires BLM land use plans and public land management to be consistent with state and local government plans, programs, and policies to the greatest extent possible while consistent with federal law. 43 U.S.C. §1712(c)(9). The proposed WSRA classifications irrevocably conflict with planned water projects that exercise both vested and valid rights and reasonably foreseeable uses. The existing rights and planned uses show that the proposed segments do not meet the suitability criteria that BLM must follow or the consistency mandate	See General Comment Response #18

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		found in FLPMA.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	c. Future Interbasin Water Compacts The development of Yampa River water is a probability given the need for inter-basin transfers within the state and related diversions and storage that are necessary to make such transfers possible. In the next five years, the state and regional boards established pursuant to the "Colorado Water for the 21' Century Act" (HB 1177) will identify and agree on interbasin storage and transfer projects to address projected water shortages among municipalities on the Front Range. HB 1177 divides the state into several regions, each of which has a board. The Yampa River is part of the Yampa-White River Roundtable. The statewide board made up of representatives from the regional boards, will make decisions concerning future water development and water transfers to deal with the lack of water on the Front Range during low water years. Their mission is the assure sufficient water to meet the future needs of the entire state. The limits that the WSRA classification would place on construction of water facilities and storage puts BLM on a collision course with the state and regional water planners that are mandated to find innovative solutions to the state's water needs. Any WSRA classification would hand-cuff and impair the efforts of the State of Colorado to find solutions to water shortages that affect the future of the entire state and its residents. The RMP, for this reason, should conclude that the WSRA classifications are not in the public interest, do not meet the suitability criteria, and would violate FLPMA's obligation of consistency with state and local government plans.	See General Comment Response #19
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	3. Historical and existing rights adversely affected. DM 8351.33 ¶A.10 a. Existing rights BLM cannot adopt a river classification that impairs or would impede existing state-recognized water rights, whether developed or not yet developed. BLM management of a river segment classified under the WSRA prohibits construction of major water projects, DM 8351.51 ¶¶A, B. It also involves claims for instream flows to retain the water within the river, DM 8351.51, B.2.k, C.2.i, which conflict with the valid rights entitling the owners to divert the water.	See General Comment Response #30
Wild and Scenic Rivers	Juniper Water Conservancy District (through	Pursuant to 16 U.S.C. §1283(b), WSRA designation by Congress must be subject to valid existing rights, including the exercise of the water rights associated with the Juniper/Cross Mountain Projects.	See General Comment Response #21

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	Romney Law Office)	Alternatively, the United States would have to pay just compensation for the taking of the water rights and lost value of the developed water rights. The cost of condemning the Juniper/Cross Mountain Project water rights would be very, very significant.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	BLM lacks authority to condemn or take water rights, including the development rights afforded under state law. Thus, BLM cannot adopt land use allocations that interfere with the operation of state water rights, because that would fail to honor valid existing rights. The proposed WSRA segments cannot be managed as scenic, recreation or wild river segments due to the vested and valid water rights and the related plans, projects, and policies adopted by state and regional agencies.	See General Comment Response #21
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	If BLM were to adopt the proposed WSRA classifications, water resource development, and even the simple task of getting a Section 404 permit to develop a diversion structure, or other activity related to the ongoing use and diversion of water would be severely impaired. Attached hereto as Exhibit C is a list of conditional water rights that exist in Water Districts 44, 54, 57 and 58, all of which are within or upstream of the proposed Yampa segments. Also attached as part of Exhibit C is a Water District map showing the location of Water Districts 44, 54, 57 and 58. A review of these decrees demonstrates that there are hundreds of thousands of acre feet of conditional storage decreed on the Yampa and its tributaries upstream of these segments. The proposed WSRA classifications would make development of these conditional water rights difficult, if not impossible, under the standards set forth in the WSRA that are discussed above. Thus, the proposed WSRA classifications would effect an inverse condemnation of the valuable water rights and the projects. Bass Enterprises Prod. Co. v. US., 381 F.3d 1360, 1365 (Fed. Cir. 2004) (citing Lucas v. South Carolina Coastal Council, 505 U.S. 1003 (1992) in which the Court held that there is a regulatory taking when the entire value of the property is lost by operation of agency action)? The RMP must also include a takings implication assessment pursuant to Executive Order No. 12630. 53 Fed. Reg. 8859 (1988); Fallini v. Hodel, 725 F.Supp. 1113,1123-24, (D. Nev. 1989). BLM would ultimately owe the District millions of dollars in compensation and face additional claims from the owners of other water rights. Ownership of submerged lands "which carries with it the power to control navigation, fishing, and other public uses of water - is an essential attribute of sovereignty." US. v. Alaska, 521 U.S. 1, 5	BLM has the flexibility to approve water control infrastructure as long as such infrastructure does not significantly diminish the free-flowing character or the ORVs of a river segment. This does not mean that all water development is prohibited. The ability of BLM to approve such infrastructure depends on the classification of each segment. For example, in a segment classified as recreational or scenic, BLM could approve a new diversion if the diversion dam did not store water and if the size of the diversion did not diminish the ORVs.

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		(1997). This power was guaranteed to the states by the federal government upon admission of the new states to the Union and is recognized as the Doctrine of Equal Footing. Id.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	b. Man-made Diversion Structures There is a major man-made diversion of the Yampa River through the Duffy Mountain (f) '- Tunnel on the end of Segment 2. This structure is not merely a flume. The irrigation water for a significant amount of land along the Yampa River enters a man-made tunnel and crosses under Duffy Mountain. The magnitude of this diversion in the proposed Segment 2 and its close proximity to Segment 1 are grounds for a finding of lack of suitability.	See General Comment Response #43
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	Water Quality Issues The proposed WSRA classifications also fail to deal with the fact that the proposed segments are within a short distance from the City of Craig Wastewater Treatment plant. The segments are even closer to the Tri-State power plant, the largest coal-powered electrical generation plant in the state. The City of Steamboat Springs and the Town of Hayden also discharge treated wastewater into the Yampa River pursuant to valid NPDES permits. While the treated waters discharged into the Yampa River meet state and federal guidelines, the treated wastewater may affect river water quality, especially during low water times when the concentration levels of the river change. The segments of the Yampa River, while within legal pollution limits, are not pristine, outstanding, or rare to warrant classification	This information was considered during the Little Snake Field Office review of potential eligible rivers for the identification of outstandingly remarkable values. An evaluation of each river is provided in Appendix D along with a more thorough discussion of how eligibility and suitability considerations are applied to each river.
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	d. Air Quality Issues The Tri-State Power Plant emissions are not consistent with the proposed classification. A shift of the wind, failure of equipment or other events may change the outstanding values on the river. The power plant is close enough that one can often hear the noise of the power plant from both Segments 1 and 2. Clearly, due to their proximity to the power plant, Segments 1 and 2 are neither outstanding, nor rare and are not suitable for management under the WSRA.	See General Comment Response #29
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	4. State, local government interests in nondesignation, DM 8351.33 ¶A.5; Opposition of State, Regional and Local Governments, and the congressional delegation, DM 8351.33 ¶A.10 Because of significant water scarcity issues within the state, there will be major changes coming with respect to existing water uses and future water development. The extent of the water rights in the	See General Comment Response #19

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		Yampa River and demand for future water development pit BLM's RMP against the established plans, programs, and policies of the state and regional water agencies. The proposed classification will make it extremely difficult to meet the needs of the growing population projected for the communities in the planning area. Moreover, to the extent water resource project development is adversely affected, the likely result will be increased competition between water users. If water rights cannot be developed, the trend of transferring of agricultural water rights out of production and into M and I uses will grow exponentially with significant and adverse impacts to agriculture, fish, and wildlife. Farms and ranches will sell the water and either shrink their operation or leave the business, with significantly less water for fish and wildlife.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	5. Consistency of Classification with Plans, Programs and Policies of State and Local Governments, DM 8351.33 ¶A.12 The WSRA suitability criteria and FLPMA both require BLM to address consistency and to resolve inconsistencies with state and local government plans, programs, and policies to the greatest extent practical and consistent with federal law. 43 U.S.C. §1712(c)(9); 43 C.F.R. §§1610.3-1(c); 1610.3-2; DM 8351.33, ¶A.12. As explained above, the proposed WSRA classification of the Yampa River segments directly conflicts with state and regional water plans, programs, and policies. These plans are exercising long-standing appropriated water rights and, thus, these rights and plans, including the Juniper and Cross Mountain projects, must take precedence over a study, where the outcome is not specified. BLM must recognize valid rights and has no authority to regulate the exercise of state water rights. The proposed classifications do not conform to either federal law or BLM WSRA policy and should be removed from the proposed preferred alternative.	See General Comment Response #30
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	D. The Designations Are Not Necessary to Protect Endangered Fish, a Major Justification For The Proposed Classification The 2005 Draft Eligibility Report justifies the proposed Yampa River segment classification in part on the needs of endangered fish. These fish are already protected from harm under the Endangered Species Act, 16 U.S.C. §§ 1533(b)(6)(C) (critical habitat); 1533(f) (recovery plan); 1536 (consultation for any federal action), 1538(a)(1)(B) (prohibiting any taking). The protection of these fish is also assured in the Upper Colorado River Recovery Program ("Recovery Program"), which was adopted as a joint effort of the U.S. Fish and Wildlife Service, State of Colorado, Colorado River Water Conservation District, Bureau of Reclamation, and the City of	Although the ORV of threatened and endangered fish is protected by existing laws and regulations, this does not automatically make the Yampa River segments ineligible or unsuitable. A discussion of how the eligible segments meet or do not meet suitability criteria has been added to Appendix D.

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		Craig. The Recovery Program also involved a Section 7 consultation with the U.S. Fish and Wildlife Service to amend a Problematic Biological Opinion ("PBO") to approve the Recovery Program, including the expansion of the Elkhead Reservoir and the leasing of water rights for the endangered fish. The Recovery Program does not propose or contemplate wild, scenic or recreation classifications for any segments of the Yampa River Basin under WSRA.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	After years of negotiations, the USFWS, Bureau of Reclamation, Colorado Water Conservation Board, the City of Craig, and the Colorado River Water Conservation District entered into agreements to provide for the construction of the Elkhead Reservoir Enlargement. This enlargement, which will cost over $20,000,000, will increase the water storage capacity of Elkhead Reservoir by. 13,137 acre feet. Of this amount, 5,000 acre feet are being purchased through the Recovery Program for use in the' implementation of the Recovery Program and recovery of the endangered fish. The estimated cost to the Recovery Program is almost $9,000,000. In addition, the reservoir enlargement provides for a water lease for 2,000 acre feet to the Recovery Program for the additional benefit of the endangered and native fish species in the Yampa River. Copies of the Acquisition Agreement for the Elkhead Reservoir Enlargement dated February 17, 2004, and the Recovery Implementation Program Agreement between the Bureau of Reclamation, USFWS and the Colorado River Water Conservation District dated February 17, 2004, are attached as Exhibits G and H respectively. These documents outline the agreements between the parties regarding the Elkhead Reservoir enlargement, the allocation of water to the Recovery Program, and the division of costs for the project. This cooperative effort to help recover the endangered fish in the Yampa River would not have happened if the state and regional water agencies knew that the Yampa River segments would be classified under the WSRA planning authority so as to preclude future water development. The proposed WSRA classifications could actually impede the recovery of the endangered fish, because they constrain future water projects necessary to provide additional water for recovery purposes and limit future water projects in general. Moreover, the BLM needs to consult with both the Recovery Program members and USFWS before putting the proposed classifications in the draft RMP for a suitability determination due to the possible impacts on the Recovery Program. As noted above,	Fish habitat improvement projects would be allowed, as long as they do not diminish any other ORVs or negate the free-flowing nature of the segment. BLM might consider a land use plan amendment if a proposed project within the suitable segments was critical to the recovery of threatened or endangered fish.

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		these WSRA classifications could actually work against the Recovery Program by impeding or preventing water resource development for fish recovery purposes. Finally, the eligibility and suitability determinations in the proposed RMP constitute a federal action under the Endangered Species Act requiring a Section 7 consultation.	
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	Furthermore, the segments of the Yampa River are already managed by BLM as part of an SRMA, which is preferable to being managed under a WSRA classification, since the current management does not involve analysis of local vested water rights. A determination of "no action" would allow the continued management of these sections under the SRMA.	See General Comment Response #28
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	A. Vermillion Creek The entire water right for Vermillion Creek is owned by one interest holder, who can use or divert all of the water. Thus, Vermillion Creek is not "free-flowing" nor does it meet the ownership and use criteria for suitability. DM 8351.06, TB; 8351.32 ¶A.l, 8351.33 ¶A.2.	See General Comment Response #43
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	B. Beaver Creek Any ingress and egress to Beaver Creek must cross private land, thus preventing the public from using this segment. This segment does not meet the access and public land ownership criteria required for suitability. DM 8351.33 ¶A.2. The issues of state-recognized water rights must also be considered. These water rights prevent a WSRA classification since the reasonably foreseeable uses of the water and existing rights and uses conflict with the proposed scenic classification.	See General Comment Response #43
Wild and Scenic Rivers	Juniper Water Conservancy District (through Romney Law Office)	As the cited provisions in the BLM WSRA manual show, the eligibility and suitability analysis requires close consultation with all state and other units of local government. When a decision may or will interfere or conflict with the exercise of state water rights, agency plans, programs, and policies, BLM needs to work closely with the water conservation boards, the Department of Natural Resources, the state engineer, and all of the affected water conservancy districts and water users. Since these classifications also affect future water interests of the major metropolitan areas, it is clear that BLM must also consult with the major Front Range communities and their respective water agencies, including the City and County of Denver, Aurora, and Thornton.	See General Comment Response #30
Wild and Scenic Rivers	Angie & Ken Cairn	Please preserve stretches if the Yampa River and its' tributaries to protect the wild characteristics and recreation opportunities.	See General Comment Response #27

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Wild and Scenic Rivers	Robert H. King, Dr.	The plan should preserve all exceptional stretches of the Yampa River and its tributaries to protect their wild characteristics, renowned rafting and recreation opportunities, and critical habitat for endangered fish species.	See General Comment Response #27
Wild and Scenic Rivers	Kim Kunkle	I am standing by, urging you to protect the vital five eligible areas -- segments of the Yampa River, Vermillion Creek and Beaver Creek -- keeping them healthy and scenic for us and all future generations.	See General Comment Response #27
Wild and Scenic Rivers	Keith Larochelle	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Lisa Maragon	Finally, please preserve all exceptional stretches of the Yampa River and its' tributaries to protect their wild characteristics and critical habitat for endangered fish species.	See General Comment Response #27
Wild and Scenic Rivers	Randy Marlatt	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Caitlyn McKenzie	Seven stream segments on the Yampa River and one stream segment on the Little Snake River were found to be potentially eligible for wild and scenic river status - and this must be pursued	As part of the current RMP revision process, LSFO inventoried all potentially eligible Wild and Scenic River (WSR) segments within the planning area. To determine segments' eligibility, the LSFO inventoried all potentially eligible rivers, including all rivers nominated by the public or that appeared on the Nationwide Rivers Inventory (NRI). All rivers within the planning area were reviewed by BLM specialists to identify any additional rivers that might possess values making them potentially eligible for inclusion in the National Wild and Scenic River System. The results of the eligibility study are provided in Appendix D.
Wild and Scenic Rivers	Moffat County Commissioners	p. 2-44 Wild and Scenic Rivers. Moffat County is opposed to all three Wild and Scenic River segment proposals in Alternative C. We firmly believe that BLM has not adequately addressed the pages of concerns supplied to BLM from the Juniper Water Conservancy District. Not only has BLM not adequately responded to the Juniper Water Conservancy District's Comments, BLM has completely ignored that fact that not one single cooperating agency supports the Wild and Scenic determinations. BLM has also not addressed the fact that private land management on both sides of Segments 2 is controlled by one landowner who can dramatically impact BLM's ability to manage the segments passing through BLM ground. Juniper Water Conservancy Districts Comments as well as a legal brief are attached for reference.	See General Comment Response #18

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Wild and Scenic Rivers	Moffat County Commissioners	p. 2-223 Wild and Scenic River Impact Comparison. Moffat County requests BLM address the impact on recreation and WSR designation if private land on each side of the WSR close floating access across the Yampa. Since private property boarders both sides of the Yampa in three locations spaced approximately 2 miles apart throughout Segments 1 and 2 of the WSR proposal, and considering Colorado does not have 'right-to-float' laws, Moffat County requests BLM re-analyze suitability if the private landowners block floating access through the segments proposed as wild and scenic.	See General Comment Response #43
Wild and Scenic Rivers	Moffat County Commissioners	p. 4-133 Impacts to Wild and Scenic Rivers 1) Moffat County requests BLM address the impact to the WSR segments if private land on each side of the river prevents floating through the wild and scenic river segments. 2) Moffat County requests BLM address the impacts to WSR of no cooperating agency supporting the WSR recommendation.	See General Comment Response #43
Wild and Scenic Rivers	Moffat County Commissioners	Local governments in all three states have criticized the WSRA studies as not conforming to BLM's own manual. In all cases, BLM brushes off the criticism on the incorrect basis that the classification does not adversely affect water rights. Alternatively BLM concludes that if a river qualifies as wild, scenic, or recreation, BLM must protect it without regard to the position of local governments or impacts on water rights and land uses. As shown below, BLM claims that the land use plan's study classification has no impacts on water and land rights is flatly untrue. Construction of facilities (pipelines or ditches) typically related to exercise of water rights is prohibited. DM 8351.32.C.2; DM 8351.33.A.2. The same is true for other water development. c. Hydroelectric Power and Water Resource Development. No development of hydroelectric power facilities would be permitted. No new flood control dams, levees, or other works shall be allowed in the channel or river corridor. All water supply dams and major diversions are prohibited. The natural appearance and essentially primitive character of the river area must be maintained. Federal agency groundwater development for range, wildlife, recreation, or administrative facilities may be permitted if there are no adverse affects on outstandingly remarkable river related values. Similar prohibitions apply to scenic and recreation rivers. DM 8351.51.B.2 "No development of hydroelectric power facilities would be permitted. Flood control dams and levees would be prohibited. All	See General Comment Response #30

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		water supply dams and major diversions are prohibited. Maintenance of existing facilities and construction of some new structures would be permitted provided that the area remains natural in appearance and the practices or structures harmonize with the surrounding environment." DM 8351.51.C.2.b. (allows existing dams and maintenance of the dams so long as natural appearance is maintained). In all three classes of WSRA study classifications, rights-of-way to divert water are either prohibited or discouraged and are limited to existing rights-of-way. DM 8351.51.A.2.i. ("New transmission lines, natural gas lines, water lines, etc., are discouraged unless specifically authorized by other plans, orders or laws. Where no reasonable alternate location exists, additional or new facilities shall be restricted to existing rights-of-way.); DM 8351.51.B.2.i; DM 8351.51.C.2.i. On several occasions, federal courts have held that a water right does not include a right-of-way and the federal agency has discretion to impose conditions or to deny. City & County of Denver v. Bergland, 695 F.2d 475, 483 (10th Cir. 1982); Diamond Bar Cattle Co. v. United States, 168 F.3d 1209 (10th Cir. 1999). Thus, WSRA classification will directly affect the exercise of water rights and BLM must consider those impacts as part of the planning process.	
Wild and Scenic Rivers	Moffat County Commissioners	The BLM WSRA studies do not identify or address the impacts on existing water rights. But the BLM WSRA manual provides that existing water rights directly relate to the criteria for eligibility and suitability determinations. 1. Eligibility Issues In all cases, a river segment must be free flowing. River segments are "free-flowing," if "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway…" 16 U.S.C. §1286(b); DM 8351.31 ¶A, B. WSRA classification precludes future construction, diversion, or impoundment of waters and calls for claims to instream flows. DM 8351.5 ¶¶A, B. If there are existing water rights, all or much of the water can be diverted, thus changing the determination of free flowing. 2. Suitability Issues and Construction of Diversion Facilities The right of the owner of a valid existing water right to make changes in water flows and structures precludes a finding of suitability. DM 8351.24; 8351.32.C.1. Valid existing rights entail	See General Comment Response #30

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		rights of diversion and yet as shown above, all of the WSRA classifications prohibit “major diversions” and facilities and structures and “discourage” water lines. 3. Other Suitability Factors WSRA studies do not address most of the 14 factors in the BLM WSRA manual governing the suitability determination process. DM 8351.33.A.2. a. Ownership of land, DM 8351.33.A.1. In numerous cases, the river segment has private land. In most cases, there are water rights as well. Neither is discussed. b. Foreseeable uses of the land, DM 8351.33.A.3. The discussions almost never address existing and foreseeable uses of the land. For instance, the areas are generally subject to a grazing permit, and yet there is no discussion of water diversion needs for the permit or other management actions that might affect the natural appearance and the water body and adjacent stream bank. c. Local and state and congressional delegation support for WSRA designation. DM 8351.33.A.10. The reports are entirely silent on support or, in most cases, the opposition to WSRA designation. d. Valid existing rights. DM 8351.33.A.11. There is never any discussion of valid existing rights, particularly water, rights-of-way, or other rights that would conflict with management of a WSRA segment. e. Consistency with state and local plans. DM 8351.33.A.12; 43 U.S.C. §1712(c)(9). f. Coordination and consultation with other agencies and publics affected. DM 8351.33.B. This would include consultation with the state engineer’s office, local water conservation and irrigation districts, and other related agencies.	
Wild and Scenic Rivers	Jack Moman	I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	David & Tresa Moulton	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Thomas Novitsky	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek for current and future generations to enjoy.	See General Comment Response #27
Wild and Scenic Rivers	Mark Pearson	I support BLM’s findings of wild and scenic river eligibility for many segments of the Yampa River, but I question the segmentation of river stretches that artificially eliminates some segments from	As part of the current RMP revision process, LSFO inventoried all potentially eligible Wild and Scenic River (WSR) segments within the planning area. To

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		eligibility, specifically the section through Deer Lodge Park between Cross Mountain and Dinosaur. If considered in its entirety from the upstream end of Cross Mountain to Echo Park inside Dinosaur, the portion bordered by private land in Deer Lodge Park is not a substantial fraction of the river segment. Only through piecemeal segmentation can BLM arrive at the conclusion that too much private land borders this segment to make it eligible for wild river consideration.	determine segments' eligibility, the LSFO inventoried all potentially eligible rivers, including all rivers nominated by the public or that appeared on the Nationwide Rivers Inventory (NRI). All rivers within the planning area were reviewed by BLM specialists to identify any additional rivers that might possess values making them potentially eligible for inclusion in the National Wild and Scenic River System (NWSRS). However, BLM does not have the legal responsibility to perform an eligibility or suitability analyses for rivers on land managed by the National Park Service. BLM has worked with the National Park Service throughout this planning process, including opportunities to review wild and scenic eligibility findings. It is also important to note that private landowners are not under legal or regulatory obligation to review river segments for inclusion in the NWSRS. Based on these points, the Yampa River was segmented according to land ownership patterns and management responsibility. Suitability criteria #2, which has been added to Appendix D of the Proposed RMP/Final EIS, analyzes the status of land ownership patterns associated with the eligible segments.
Wild and Scenic Rivers	Mark Pearson	I have also hiked Beaver Creek and believe it merits wild and scenic river protection. Beaver Creek is an uncommon tributary of the Green River in this region that has year-round flow and supports a thriving fishery. Vermillion Creek's canyon is a remarkably unique landform in Colorado. As the DEIS notes, this stretch of river contains extraordinary petroglyphs and offers a tremendous window into the region's geology. I have hiked along Vermillion Creek on multiple occasions and believe it is absolutely deserving of wild or scenic status, and BLM should find it suitable for designation particularly since BLM refuses to protect the area's wilderness characteristics through other land management approaches.	See General Comment Response #29
Wild and Scenic Rivers	Teresa Pollard	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Julie Pruyne	In addition, I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Laura Reed-Morrisson	I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27

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Wild and Scenic Rivers	Lora Richards	I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Karen Roberts	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Matthew Roman	Wild and Scenic status should be given to all waterways being considered	See General Comment Response #27
Wild and Scenic Rivers	Dorothy Russell	By adopting your preferred alternative, you would expose two deserving streams, Beaver and Vermillion Creeks, to significant degradation.	See General Comment Response #29
Wild and Scenic Rivers	Ana Salinas	5) Make all five river stretches along the Yampa River, Vermillion Creak, and Beaver Creed eligible as Wild and Scenic areas.	See General Comment Response #27
Wild and Scenic Rivers	John Spezia	All of the areas nominated for wild and scenic should be included (5 sections).	See General Comment Response #27
Wild and Scenic Rivers	Peter Steinhart	I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	The City Council of Steamboat Springs	Special Management Area: Wild & Scenic River: Alternative C recommends three segments of the Yampa River (approximately 20 river miles) for inclusion in the National Wild and Scenic River System (NWSRS). Additionally, we urge further study for inclusion of relatively short reaches of Vermillion Creek and Beaver Creek for their high quality desert vegetation and high-quality habitat for the Colorado Native Cut-Throat Trout.	See General Comment Response #29
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	We understand that the BLM has undertaken a phased analysis of river segments in the Yampa River Basin which are potentially eligible and suitable for designation as wild and scenic rivers under federal law. The first analysis phase, the eligibility determination, resulted in the final May 2005 Draft Wild and Scenic Rivers Eligibility Report, which identified three segments of the Yampa River potentially eligible for wild and scenic river designation (in addition to two other segments located on Beaver Creek and Vermillion Creek, respectively). I further understand that the BLM received various comments on that report from concerned members of the public, including, among others, the Juniper Water Conservancy District ("Juniper District"). These comments expressed concern that the BLM's eligibility determination failed to account for substantial existing water rights that have been decreed by the Colorado Water Court in the Yampa River Basin; that these vested rights could be adversely impacted or even eviscerated by any wild and scenic river designation; and that the use of these vested rights in the future to	As noted in BLM's Wild and Scenic Rivers manual (8351), "to be eligible, a river segment must be 'free-flowing' and must possess at least one river-related value considered to be 'outstandingly remarkable.' No other factors are considered in determining the eligibility of a river segment. All other relevant factors are considered in determining suitability" (BLM-M-8351 Section .31 A). The Little Snake Field Office followed this guidance when preparing the 2005 Eligibility Report. Existing water rights were considered in the suitability analysis.

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		meet growing water demands in the Basin would alter the free flowing nature of the river segments identified by the BLM, thus making the Yampa River Basin ineligible and unsuitable for wild and scenic river designation.	
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	The BLM has now completed the second analysis phase, the suitability determination, under which the BLM is to identify in the Draft EIS those Yampa River segments that possess outstandingly remarkable values making them suitable for potential inclusion in the national wild and scenic rivers system. Tri-State concurs with and joins in the eligibility comments of the Juniper District described above, which are directly relevant to the BLM's suitability determination now at issue in the Draft EIS. Indeed, the BLM's Draft EIS acknowledges that the prior public comments received during the eligibility determination phase must be addressed in the current suitability determination phase. The results of the Draft Wild and Scenic River Eligibility Study have been reviewed by all interested parties, and comments and recommendations have been received... Many comments address the suitability of the eligible river segments (including land ownership, accessibility, need for special protection, and impacts on existing uses, including water rights), and these comments will therefore be considered during the suitability phase of the process. Draft EIS at D-l (emphasis added). In reviewing the Draft EIS, it does not appear that these prior public comments have been specifically noted or addressed by the BLM in the current suitability phase of the wild and scenic river study process.	The impacts analysis portion of the Draft RMP/EIS addressed many of the suitability considerations for all the alternatives in chapter 4. The Proposed RMP/Final EIS has been revised to ensure that all the suitability criteria are addressed. This includes the addition of the specific suitability analysis in an appendix in the Proposed RMP/Final EIS. Responses to public comments received on the draft eligibility report are posted here: http://nwcos.org/Resources/BLM%20Documents/Consideration%20of%20WSR%20report%20comments_6-29-05.pdf.
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Under federal law, in determining whether the eligible Yampa River segments are suitable for wild and scenic river designation by Congress, the BLM is now required to assess the actual impacts, including cumulative impacts that would occur from designation or non-designation of those segments in the Draft EIS. It is improper for the BLM to defer such analysis into the future, as it proposes to do in the Draft EIS, while managing the eligible river segments on an interim basis to protect their free flowing nature pending a final suitability determination. Rather, the Draft EIS must analyze "reasonably foreseeable potential uses of the land and related waters that would be enhanced, foreclosed, or curtailed if the area were included in the national wild and scenic rivers system." 16 U.S.C. § 1275(a). The Draft EIS also must assess "historical or existing rights which could be adversely affected with designation," and the public's "interest in designation or non-designation of the river." Further, the Draft EIS must consider the "estimated cost of	The Proposed RMP/Final EIS has been revised to ensure that all the suitability criteria are considered. This includes the addition of the specific suitability analysis in an appendix in the Proposed RMP/Final EIS.

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		acquiring necessary lands [or] interests in lands," and the BLM's "ability…to manage and protect the river area or segment as a wild and scenic river, or means to protect the identified values other than wild and scenic river designation." See BLM Manual 8351 (BLM 2001).	
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	An analysis of the adverse effects of wild and scenic river designation on specific Colorado water rights located both within and upstream of the eligible Yampa River segments is notably lacking from the Draft EIS. Without an analysis of potential water rights impacts within and upstream of each eligible Yampa River segment, the BLM has not discharged its planning duties under federal law or adequately addressed the propriety of wild and scenic river designation. Importantly, the BLM's final suitability determination must take into account "potential conflicts with future uses and state or local interests in the river." Center for Biological Diversity v. Veneman, 335 F.3d 849, 853 (9th Cir. 2003).	See General Comment Response #18
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	The Draft EIS also lacks any analysis of the estimated costs of acquiring water rights that conflict with wild and scenic river designations. Absent the payment of fair market value for the taking of these valuable water rights under the Wild and Scenic Rivers Act, the BLM has no ability or authority under federal law to abrogate these rights in order to achieve wild and scenic river management and/or designation. See 16 U.S.C. § 1284(b) (providing that "any taking by the United States of a water right which is vested under either State or Federal law at the time such river is included in the national wild and scenic river system shall entitle the owner thereof to just compensation"). Millions of dollars have been invested in the appropriation, development and protection of these existing rights under Colorado law for purposes of providing reliable water supplies within the Yampa River Basin in the future. The enormous monetary compensation that would be required under federal law to remove the future demand of these rights from the Yampa River is sufficient reason by itself to avoid any wild and scenic river designation.	See General Comment Response #21
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Interim Wild and Scenic River Management is Improper: The Draft EIS states as follows: In accordance with BLM policy, all eligible rivers were evaluated for suitability. BLM's findings in this land use planning process should not be considered as "proposed designation" of the studied segments. BLM is simply analyzing the segments to identify outstandingly remarkable values and to identify whether or not a [wild and scenic river] designation by Congress would be a feasible	When BLM determines that stream segments are “suitable” for designation, it means that BLM believes the segments would be worthy additions to the National Wild and Scenic Rivers System, and that Wild and Scenic River designation would be one of the best ways to manage the outstandingly remarkable values. If BLM does not submit a recommendation to Congress and the President, it has made findings that Congress and the President

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		method for enduring protection of those values. BLM is not making a proactive recommendation to the U.S. Congress and the President that these segments be immediately designated. Draft EIS at 2-36. The Draft EIS then goes on to clarify that the BLM plans to defer to the outcomes of several state and local water resource planning processes - including the Colorado Statewide Water Supply Initiative, the Basin Roundtables and the Interbasin Compact Process - in deciding whether to recommend the identified Yampa River segments for wild and scenic river designation in the future. As discussed in the Introduction above, Tri-State urges the BLM to properly analyze the suitability of the identified Yampa River segments in the Draft EIS and, based upon such analysis, to reach a final determination at this time that such segments are unsuitable for designation. The time for assessing the suitability of these Yampa River segments is now in the EIS process on the RMP; it is improper for the BLM to defer such determination into the future with vague reference to water resource planning processes that may or may not answer the question of whether additional sizeable diversion projects (including possible trans-mountain or trans-basin diversion projects) will be undertaken in the Yampa River Basin in the future. The BLM need not defer to these state water resource planning processes to answer the suitability question at this time. Rather than delaying a determination that is capable of resolution now, the BLM merely needs to assess the large number of existing water rights in the Basin, particularly conditional water rights, which will serve to reduce Yampa River flows in the future; and then, based upon such assessment, to find that the potentially eligible Yampa River segments are not suitable or feasible to be managed and/or designated as wild and scenic rivers.	may utilize at their discretion, but it is not actively proposing designation. The Proposed RMP/Final EIS has been revised to ensure that all the suitability criteria are considered. This includes the addition of the specific suitability analysis in an appendix in the Proposed RMP/Final EIS.
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Nor does the Draft EIS discuss or analyze any of the other major conditional water rights in the Yampa River Basin that also would be adversely affected by wild and scenic river management and/or designation. The BLM's failure to discuss in any detail these other water rights constitutes a major flaw in the Draft EIS and undermines the legitimacy of the BLM's findings and conclusions about the suitability of the eligible Yampa River segments. However, even without analyzing other existing water rights, the existence of the substantial conditional water rights associated with the Juniper/Cross Mountain Projects pose a direct conflict with, and thereby render unsuitable, any wild and scenic river designations in the Yampa River Basin. The restrictive legal standards that would apply to such designations under federal law would likely make it	The Proposed RMP/Final EIS has been revised to provide an analysis of these impacts.

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		impossible to develop these water rights in accordance with Colorado Water Court decrees. To illustrate, once designated as a wild and scenic river segment under the Wild and Scenic River Act, any federal assistance is prohibited to two types of upstream or downstream water development: (1) water resource projects that will "invade" the wild and scenic river designation; and (2) water resource projects that will "unreasonably diminish" the outstandingly remarkable values present in the designated segment. 16 U.S.C. § 1278(a). This prohibition applies to all federal departments and agencies, which are forbidden from assisting by any loan, grant, license or otherwise in the construction of any water resources project which would be located within or would adversely affect the wild and scenic river designation. 16 U.S.C. § 1278(b). The Department of the Interior has defined "water resources project" as any "dredge and fill activity that requires a federal permit." 36 C.F.R. § 297.3 (2003).	
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Under these restrictive standards, to the extent that any of these existing conditional water rights in the Yampa River Basin are located - in whole or in part - upon federal lands, even the relatively simple task of obtaining a Section 404 "dredge and fill" permit under the Clean Water Act could become extremely difficult, if not impossible. This would include some of the conditional water storage rights owned by Tri-State and/or the Yampa Participants upstream of the eligible Yampa River segments, as well as other water rights located upstream of the eligible Yampa River segments on federal lands. These potential conflicts are required to be addressed by the BLM and analyzed in the Draft EIS, including estimating the projected costs of just compensation for the taking of the massive conditional water rights associated with the Juniper/Cross Mountain Projects, among others. When properly doing so, Tri-State believes that the only reasonable conclusion to reach is that the potentially eligible Yampa River segments are neither suitable nor feasible to be designated and/or managed as components of the national wild and scenic river system.	See General Comment Response #21
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Tri-State submits that a foreseeable cumulative impact of wild and scenic river designation (or interim management) is the likelihood that denials of the ability to implement existing water rights or develop new water resource projects will exacerbate the trend towards conversion of senior agricultural water rights to meet growing municipal and industrial water demands. The BLM must acknowledge in the Draft EIS that to the extent wild and scenic river protection precludes water resource project development, the likely	BLM believes it is highly unlikely that a wild and scenic river designation would result in negative impacts on agriculture. Any federal water rights associated with designation would be junior to all existing conditional water rights, so conditional water rights for municipal and industrial use could still be developed. The exception would be storage water rights with decreed locations within designated

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		result will be increased competition among water users and a corresponding transfer of agricultural water rights out of production and into municipal and industrial use, with resulting adverse impacts to both the natural and human environments. The results of the SWSI study described above reasonably support the potential occurrence of such adverse, cumulative impacts. The BLM should properly acknowledge these adverse impacts in the Draft EIS.	segments, which could not be developed.
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	Under certain language contained in the Draft EIS, interim wild and scenic river management by the BLM could result in denial of any water resource project for which the BLM's consent would be required and which would result in a reduction of the outstandingly remarkable values and free flowing nature of the eligible Yampa River segments. See, e.g., Draft EIS at 2-44 (stating that under Alternative A, the BLM would not permit any activities that could adversely affect outstandingly remarkable values and free flowing river characteristics). If BLM must prohibit all water control infrastructure in order to preserve the free-flowing nature of the eligible segments, this could result in denial of any federal grant, permit, license or other authorization required from the BLM in order to implement development of decreed conditional water rights in the Yampa River Basin. Such denial could effectively foreclose development of these valuable conditional rights and might even lead to their cancellation by the Colorado Water Court. That the BLM does not intend to object in Colorado Water Court to diligence proceedings for such conditional water rights, or to applications for new water rights appropriations, may be immaterial from the perspective of Colorado water users; if the BLM's consent is required in order actually use these water rights and the standards for interim wild and scenic river management preclude the BLM from providing such consent, then interim management of wild and scenic segments in the Yampa River Basin still could foreclose water resource projects needed to meet growing demands.	BLM has the flexibility to approve water control infrastructure as long as such infrastructure does not significantly diminish the free-flowing character or the ORVs of a river segment. This does not mean that all water development is prohibited. The ability of BLM to approve such infrastructure depends on the classification of each segment. For example, in a segment classified as recreational or scenic, BLM could approve a new diversion if the diversion dam did not store water and if the size of the diversion did not diminish the ORVs.
Wild and Scenic Rivers	Tri-State Generation and Transmission Association, Inc.	The existence of substantial vested water rights in the Yampa River Basin - both absolute and conditional in nature - directly conflicts with any interim wild and scenic river management by the BLM, as well as any future congressional designation of such segments as components of the national wild and scenic river system. Absent condemnation of such water rights in accordance with federal law, these existing rights constitute a "burden on the stream" under Colorado water law, which already deplete and will further reduce Yampa River stream flows as water demands increase in the future.	See General Comment Response #19

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Wild and Scenic Rivers	Gaines Whitcomb	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Kunda Wicce	(4) protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Find all eligible segments suitable - All five segments found to be eligible should be advanced as suitable, recommended for inclusion in the Wild and Scenic Rivers System, and correspondingly protected administratively until Congress decides about their inclusion in that system. No information provided in the Draft RMP suggests a justification for not finding the Beaver Creek or Vermillion Creek segments suitable. Both segments boast reliable stream flow, are free-flowing, and possess at least one outstandingly remarkable value, as described in the eligibility report. Both segments should be found eligible and managed to protect the values that make them so.	The Draft RMP/EIS analyzed the impacts of determining a range of alternatives for wild and scenic rivers. Based on the alternatives analysis in the Draft RMP/EIS, as well as public comments, the Proposed RMP (Alternative C) was determined to contain the segment decisions that would be analyzed for suitability. Appendix D was revised in the Proposed RMP/Final EIS to include an analysis of all the suitability criteria for the Proposed RMP (Alternative C).
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Protective measures must be specific to wild and scenic eligibility and suitability - Protective management prescriptions and requirements—specific to segments to the values that have prompted findings wild and scenic eligibility and suitability—must be included the final RMP. The draft plan's references to other management prescriptions or designations that could, by coincidence help protect features that contribute to the segments' eligibility and suitability are helpful (wilderness study areas, areas of critical environmental concern, visual resource management classes, mineral withdrawals, etc.). Those coincidental protections and designations must, in the Final RMP and in its implementation, be kept in place specifically for wild and scenic river purposes, or similar measures must be provided in the final plan exclusively for wild and scenic river purposes.	The Draft RMP/EIS does not include "coincidental protections" for wild and scenic river protection under any of the alternatives. The prescriptions in the wild and scenic river alternatives were developed to be specifically applied to the wild and scenic river corridor in order to protect the tentative classifications and outstandingly remarkable values.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Protect all eligible segments - Whether found suitable or not, all segments found eligible must, under the provisions of the Wild and Scenic Rivers Act and accompanying regulations, be managed in order to preserve the characteristics that make those segments eligible. Correspondingly, the protective measures contemplated for Vermillion Creek and for Beaver Creek, under Alternative D—at the least—must be implemented for those stream segments.	The commenter is incorrect in suggesting that the Wild and Scenic Rivers Act and its accompanying regulations state that any eligible segment needs to always be protected, regardless of whether it has been found suitable or not. However, BLM's wild and scenic river manual (BLM-M-8351) notes that "as long as a river segment is under study, it must be afforded protection at the tentative classification level it was given when determined eligible, even if a another classification is considered as an alternative in the RMP." However, the manual also states that "BLM prepares the WSR river study report/ROD for

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			rivers evaluated pursuant to Section 5 of the WSRA. For any rivers determined suitable and subsequently recommended by the Secretary of the Interior for inclusion in the NWSRS, a WSR river study report/ROD shall be prepared for transmittal to the Congress." This implies that when the ROD is signed, all eligible river segments not found suitable are no longer under study, and therefore no longer must be afforded protection. BLM will comply with this direction in the management of any eligible wild and scenic river segment not determined suitable in the Final RMP/ROD.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	B. Apply all available protections specific to wild and scenic river segments. Whatever the ultimate collection of stream segments found to be suitable, all those segments should be subject to all the protective measures described in the various RMP alternatives. In particular, measures listed for Alternative D, but not shown for preferred Alternative C, should be included in the final plan. Recommendations: The RMP should include the protective measures identified in Alternative D, in addition to those cited for Alternative C, include managing all suitable segments as: • closed to off-highway vehicle use; • withdrawn from mineral entry; • VRM Class I or Class II areas; • right-of-way exclusion areas • priority areas for remedial actions to ensure that spawning Colorado pikeminnow habitat is maintained or enhanced; • extensive no-surface-occupancy stipulations areas for all activities;	The Draft RMP/EIS considers a range of alternatives that, in accordance with BLM's wild and scenic river manual, includes one alternative that provides "for designation for all eligible river segments (under assessment in the RMP/EIS) in accordance with their tentative classifications. Another alternative shall provide for no designation. Additional alternatives may be formulated for any combination of designations and/or alternative classifications and/or administrative designations." Concerning the prescriptions that should be associated with each segment, it is not appropriate to simply attach a generic set of management for all segments. Rather, management should be developed to protect the tentative classifications and outstandingly remarkable values. As those vary, the management needed to protect them would vary as well, as it does in the Draft RMP/EIS.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	C. Reconsider and expand eligibility determinations. The final eligibility report, published as an appendix to the Draft RMP, found that, of a total of nearly 300 stream segments reviewed, only five would be found eligible. The draft eligibility report noted that 34 segments carry perennial flows and are free-flowing, meeting the two tangible, objective eligibility criteria under provisions of the Wild and Scenic Rivers Act. It seems logical that more than five of those 34 segments would have at least one outstandingly remarkable value, and thus eligible for further study and for interim protection. Before completing the Final RMP, the BLM should provide for public review and comment supplemental information describing the potential outstandingly remarkable values considered for the 34	While the commenter is requesting the supplemental information on potential outstandingly remarkable values that were considered for all 34 stream segments that were perennial and free-flowing, the BLM interdisciplinary team determined that 29 of those segments did not contain any outstandingly remarkable values. As such, there is no information on outstandingly remarkable values to convey. BLM understands the evaluation criteria. All segments that were free-flowing, carried perennial flows, and had even one outstandingly remarkable value were included in the Draft RMP/EIS as eligible.

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		stream segments and the corresponding explanations for the agency's failure to recognize and protect those values. The criteria for eligibility evaluation are clear. Since more detailed management decisions about stream segments would be made 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 three primary eligibility criteria, including even one outstandingly remarkable value. When in doubt, include them as eligible. This inclusive approach is directed, and thus applicable to all the stream portions described below, in the Department of the Interior's Bureau of Land Management Manual chapter "8351 –Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, and Management (BLM Manual). Section .31A of that manual states: Basis for Determination. To be eligible, a river segment must be "free-flowing" and must possess at least one river-related value considered to be "outstandingly remarkable." These factors are summarized in Illustration 1. No other factors are considered in determining the eligibility of a river segment. All other factors are considered in determining suitability." (emphasis added) Even short of the nearly 300 stream segments found to have at least two of those characteristics, eight were found, in the 1991, to be eligible, that is, also containing outstandingly remarkable values. At the least, all eight of those segments should still be found eligible, considered for suitability, and administratively protected in the interim.	Concerning public opportunities to review and comment on the Wild and Scenic River Eligibility Report, it is important to note that the Report is not a NEPA document subject to public review requirements. That being said, the public was provided opportunities to provide information on wild and scenic rivers (segments to consider, identification of outstandingly remarkable values, etc.) during public scoping or during the review of the Draft RMP/EIS. In addition to the formal public comment opportunities, in 2005 BLM held a public meeting and invited public comment on the Draft Eligibility Report. In fact, on June 24, 2005, the commenter provided a 7-page letter addressing the draft eligibility determinations. Concerning the segments that were determined to be eligible in 1991 but were not found to be eligible in this review, an ID Team examination of the criteria and outstandingly remarkable values identified in the 1991 evaluation found that values were not present in several of the segments, therefore they were not identified as eligible.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Yampa River, general – The BLM should find eligible the entire length of the Yampa River from Williams Fork to Dinosaur National Monument. The river's continuity and the integrated health and protection of stream and corridor values are key to the protection and proper management of any one segment. Correspondingly, breaking the river into segments for analysis of eligibility criteria misses the integrated nature of values that meet those criteria through the river's length. The entire length of the river below its confluence with Williams Fork meets the criteria of reliable flows and free-flowing condition. The entire stretch is also eligible in terms of the outstandingly remarkable value of river recreation. The entire stretch enjoys length of season, flow, diversity of use, quality experience, scenery and naturalness, high level of use, and associated attractions of open scenery—both	The Wild and Scenic River Eligibility Report documents the BLM Interdisciplinary (ID) team review of 292 rivers or river segments. These river-segments include all rivers listed, nominated, or identified by the ID Team or identified by other sources including state, tribal or local governments, or interested members of the public, and that flow perennially or have regular and predictable flows. This included the entirety of the Yampa River. The rivers were segmented following direction from BLM wild and scenic river manual (BLM-M-8351), which states that "rivers identified for review may be divided into segments for evaluation purposes. For example, changes in river character such as the presence of dams and reservoirs, significant changes in types or

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		natural and agricultural, historic structures, geologic diversity. Various portions of the stretch include unique scenic, fish, historic, and ecological values, but the entire stretch qualifies just for its river-related recreation opportunities and use.	amounts of development, significant changes in physiographic character, tributaries, or features, and/or significant changes in land status should be considered in identifying river segments for evaluation." Based on the amount of development and land ownership patterns along the Yampa River, considering it as one segment would not be consistent with the manual direction. Simply claiming that the river has a given outstandingly remarkable value does not present new information that the ID team can consider that it has not already considered. The commenter's claims of outstandingly remarkable values are unsubstantiated, and present no new detail for the ID Team to consider.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Yampa River, Duffy Tunnel to Cross Mountain – The basis for not including these segments as eligible—a small diversion and the amount of private land included—are erroneous and selectively applied. The Maybell Ditch diversion reduces the overall river flow by a very small proportion, is not an impoundment, and does not alter the free flowing nature of the river. The assertion that a large percentage of the segment passes through private land is founded, in part, in the arbitrary selection of the segments' end points. When considered in combination with the rest of the river between Williams Fork and Dinosaur National Monument, the overall proportion of private land reduces significantly. More important, this long stretch is the very heart of the river and so is essential to the continuity of next study phases. The BLM Manual's Illustration 1, mention in the Manual citation above, makes no mention of land ownership patterns as factors affecting a stream segment's eligibility.	Free-flowing is defined by Section l6(b) of the Wild and Scenic Rivers Act as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." When reviewing this segment, the BLM Interdisciplinary (ID) team considered the BLM WSR manual language that notes that the "existence of small dams, diversion works, or other minor structures at the time the river segment is being considered shall not automatically disqualify it for consideration as a potential addition to the NWSRS." The ID Team questioned the free-flowing nature of Juniper Canyon because of the Maybell Ditch Diversion Dam. Because of the diversion, that portion of the segment was not considered free-flowing. Including this segment merely because it is the "very heart of the river" is not consistent with the evaluation criteria for wild and scenic rivers. While the commenter is correct that the WSR manual basis for determining eligibility does not include consideration of land ownership, it repeatedly notes that the evaluated river segments should be located on BLM-administered lands (BLM-M-8351, Section .06). The manual states that "in cases where a particular river segment is predominantly non-federal in ownership and contains interspersed BLM-

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			administered lands, BLM shall evaluate only its segment as to eligibility and defer to either the State or private landowners' discretion as to their determination of eligibility." For this segment, the ID Team determined that the amount of BLM-administered lands was so small and scattered as to eliminate the potential for any outstandingly remarkable river-related values on BLM-administered lands within the corridor.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Yampa River, Duffy Tunnel to private land boundary (Signal Butte) – The portion of the river immediately below Duffy Tunnel bends around the distinctive, scenic, and geologically significant Signal Butte. This portion therefore contains features from at least three of the outstandingly remarkable criteria—scenic, geologic, ecological. Whatever decision is made about the private lands portions of the Duffy-to-Dinosaur segment of the river, this portion around Signal Butte should be found eligible.	This portion of the Yampa River is included in Yampa Segment 2, as noted in the Eligibility Report as well as in chapter 2 and Map 2-7 of the Draft RMP/EIS. It is eligible and has outstandingly remarkable values for fish and recreation. While the scenery may be striking in this area, the BLM WSR manual notes that scenic outstandingly remarkable values "must be scenic quality "A" as defined in BLM Visual Resource Inventory Handbook, H-8410-1." BLM Interdisciplinary Team determined that this segment did not meet that standard. The Draft RMP/EIS analyzed this segment as suitable for Alternatives C and D. This segment is considered suitable for the Proposed RMP.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Yampa River, Juniper Canyon – A uniquely important portion of the Duffy-to-Cross Mountain segment is the stretch past Little Juniper Mountain and through Juniper Canyon. This portion is, of course, of reliable flows and is free-flowing (as noted above). In addition, this portion includes every single one of the eight outstandingly remarkable values—scenic, fish, recreation, wildlife, geologic, historic, cultural, and ecological—including all of the subset values under each, as summarized in the report's list of eligible values and as described in more detail in the BLM Manual section .31. The Juniper Canyon portion is included in the Juniper Mountain Special Recreation Management Area and attracts significant recreational and ecological study interest both on the river and in the corridor. Whatever decision is made as to the eligibility of the private lands portions of the Duffy-to-Dinosaur segment, this portion through Juniper Canyon should be declared eligible without reservation or hesitation.	Free-flowing is defined by Section l6(b) of the Wild and Scenic Rivers Act as "existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway." When reviewing this segment, the BLM Interdisciplinary (ID) team considered the BLM WSR manual language that notes that the "existence of small dams, diversion works, or other minor structures at the time the river segment is being considered shall not automatically disqualify it for consideration as a potential addition to the NWSRS." The ID Team questioned the free-flowing nature of Juniper Canyon because of the Maybell Ditch Diversion Dam. Because of the diversion, this portion of the segment was not considered free-flowing, and therefore not eligible for inclusion in the Wild and Scenic River System. In addition, simply claiming that the segment has a given outstandingly remarkable value does not

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			present new information that the ID team can consider that it has not already considered. The commenter's claims of outstandingly remarkable values are unsubstantiated, and present no new detail for the ID Team to consider.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Yampa River, Cross Mountain to Dinosaur National Monument – This segment, in addition to being an important portion of the overall length of the river, as described above, includes its own unique public values and should be found eligible. The segment is of reliable flows and is free-flowing, and it contains nearly all, perhaps all, of the outstandingly remarkable values summarized in the draft report and described in the BLM Manual. The segment constitutes the river's entrance into Dinosaur National Monument and so warrants special attention and protection. The importance of declaring this segment eligible, thus setting in motion discussions of best management to the mutual benefit of both the natural environment and private landowners is enhanced, rather than diminished, by the presence of private land along the river. Discussions of the river's suitability is an excellent opportunity to engage landowners, to better understand their needs and concerns along a publicly popular river, and to prepare a consensus approach to its protection and management. The Draft RMP's assertion that the segment contains too much private land to be eligible is simply inaccurate. Of the approximately 18 miles of riverbank in the segment (nine miles each side), barely half is on private land. At the least, the river itself and the south bank of the river through this segment, the latter administered almost entirely by the BLM, should be found eligible.	While this segment is the entrance into Dinosaur National Monument, it is not on BLM-administered lands. While the basis for determining river eligibility in BLM's Wild and Scenic River manual does not include consideration of land ownership, it repeatedly notes that the evaluated river segments should be located on BLM-administered lands (BLM-M-8351, Section .06). The manual specifically states that "in cases where a particular river segment is predominantly non-federal in ownership and contains interspersed BLM-administered lands, BLM shall evaluate only its segment as to eligibility and defer to either the State or private landowners' discretion as to their determination of eligibility." For this segment, the ID Team determined that the amount of BLM-administered lands was small enough as to eliminate the potential for any outstandingly remarkable river-related values on BLM-administered lands within the corridor.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Vermillion Creek, downstream from Blue Hill Road – We appreciate the draft report's finding of eligibility for a portion of Vermillion Creek (from Blue Hill Road downstream to the private land boundary). That finding of eligibility should be extended downstream to the creek's confluence with the Green River (or, considering administrative distinctions, at least to the boundary between Brown's Park National Wildlife Refuge and BLM-administered lands). The lower segment's scenic values are significant, including distinctively steam and high corridor banks, a dazzling waterfall, and meanders through diverse arroyos and across rolling sage country, collectively meeting eligibility criteria for scenic, fish, recreation, wildlife, geologic, and ecological values. The lower section is of reliable flows and is free-flowing, just as is	While the commenter requests that the Vermillion Creek segment be extended, the ID Team found that no outstandingly remarkable values (ORV) were identified in any segments above or below the segment that was found to be eligible. In the absence of ORVs, those segments were not eligible. While the area downstream may be beautiful, the BLM WSR manual notes that scenic ORVs "must be scenic quality "A" as defined in the BLM Visual Resource Inventory Handbook, H-8410-1." The BLM Interdisciplinary Team determined that this segment did not meet that standard.

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		the upper segment that is found eligible in the draft report.	
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Vermillion Creek, upstream of Blue Hill Road – The portion of the Vermillion Creek upstream of Blue Hill Road, between that road and Road 2033, should be found eligible. This portion is of reliable flows and is free-flowing, just as is the portion below Blue Hill Road. The upper portion also includes a wide array of outstandingly remarkable values, including hunting and fishing opportunities (recreation), distinctive limestone ridges and seashell fossil beds (scenic and geologic), rare and unusual plants identified by the Colorado Natural Heritage Program (ecological), colorful badlands (scenic), and petroglyphs (cultural). This portion of the creek also traverses the Vermillion Citizens' Wilderness Proposal and lands previously inventoried by the BLM as being roadless and including an array of values that contribute to the streams eligibility.	While the commenter requests that the Vermillion Creek segment be extended, the BLM Interdisciplinary (ID) Team found that no outstandingly remarkable values (ORV) were identified in any segments above or below the segment that was found to be eligible. In the absence of ORVs, those segments were not eligible. In addition, simply claiming that the segment has a given outstandingly remarkable value does not present new information that the ID team can consider that it has not already considered. The commenter's claims of outstandingly remarkable values are unsubstantiated, and present no new detail for the ID Team to consider. While there may be recreational opportunities, interesting geologic features, sensitive plants, and cultural sites, the ID Team determined that none of these met the high standards and criteria described in the BLM Wild and Scenic River manual.
Wild and Scenic Rivers	Wilderness Society (The), et. al.	Little Snake River – The Draft RMP proposes to drop a former eligibility finding for the BLM resource area's namesake stream. The 1991 preliminary eligibility evaluation found 9 ½ miles of the Little Snake River between Highway 318 and the confluence with the Yampa River to be eligible. This change is based on a new assertion that the 1991 report found only one outstandingly remarkable value in the river (rare and endangered fish). That earlier report failed to recognize other important values in and along the Little Snake, including: diverse views of natural landscape (scenic), as well as fishing, hiking, hunting, wildlife watching (recreation and wildlife), and those values should be reviewed and then used as basis for a revised finding of eligibility. The river qualifies under several of the criteria justifying a finding of eligibility, and that finding should be retained now.	The 1991 preliminary eligibility study identified the Little Snake River as having one outstandingly remarkable value related to a sensitive fish species, the Colorado pikeminnow. Due to subsequent studies and monitoring by the Colorado Department of Wildlife (CDOW) "the Little Snake River is not within the designated critical habitat" for this species. The last documented pikeminnow to be captured in the Little Snake was in 1990 in southern Wyoming. The Little Snake River is not included within the US Fish and Wildlife Service's designated critical habitat area for the pikeminnow. The commenter's claims of ORVs are unsubstantiated, and present no new detail for the ID Team to consider. While there may be recreational opportunities, natural landscapes, and wildlife habitat, the ID Team determined that none of these met the high standards and criteria described in the BLM Wild and Scenic River manual. For example, the mere presence of recreational opportunities does not mean the segment has a recreational ORV. The BLM Wild and Scenic River manual states that a recreational ORV is when the

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			"recreational opportunities are or have the potential to be unusual enough to attract visitors to the geographic region. Visitors are willing to travel long distances to use the river resources for recreational purposes." While this fits for some of the Yampa River segments, the BLM ID Team determined that the Little Snake River did not contain any ORVs, neither in the form of the endangered fish or other ORVs.
Wild and Scenic Rivers	Lynda Winslow	Protect all five eligible Wild and Scenic river stretches along the Yampa River, Vermillion Creek, and Beaver Creek.	See General Comment Response #27
Wild and Scenic Rivers	David Ylvisaker	I urge you to protect all five eligible Wild and Scenic river segments of the Yampa River, Vermillion Creek and Beaver Creek.	See General Comment Response #27
Wild Horses	Moffat County Commissioners	p. ES-9 Wild Horses Moffat County has requested several times in the past, and once again we request that a Wild Horses be managed to meet Rangeland Health Standards, not solely AML numbers. Please add this comment to p. 2-29, Wild Horses, also.	As noted on page 2-76 of the Draft RMP/EIS, the "The Colorado Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management (Appendix A) apply to all resource uses on public lands." The rangelands in the Sand Wash Basin HMA are already managed according to these standards, in addition to the appropriate management level at which the wild horse herd needs to be maintained to best meet those standards. As this is already contained in BLM policy, stating it in the RMP is not needed for clarification or implementation.
Wild Horses	Moffat County Commissioners	p. 2-29 Wild Horses Moffat County has requested several times in the past, and once again we request that a Wild Horse Goal be written to manage the Horse Management Area to meet Rangeland Health Standards, not solely Allotment Management Level numbers. Please add this comment to p. ES-9 Wild Horses.	As noted on page 2-76 of the Draft RMP/EIS, the "The Colorado Standards for Healthy Rangelands and Guidelines for Livestock Grazing Management (Appendix A) apply to all resource uses on public lands." The rangelands in the Sand Wash Basin HMA are already managed according to these standards, in addition to the appropriate management level at which the wild horse herd needs to be maintained to best meet those standards. As this is already contained in BLM policy, stating it in the RMP is not needed for clarification or implementation.
Wild Horses	NW Colorado Oil and Gas Association	ES-9 Wild Horse- Wild Horses should be managed to the standards of Rangeland Health. Also I will request here and in the 5% disturbance section, we need to make available year round drilling in Sand Wash if they utilize 5% disturbance and rolling reclamation.	As noted in the Draft RMP/EIS (page 3-1), the rangeland health standards "apply to all actions, not just livestock grazing." In addition, the Draft RMP/EIS considers no seasonal stipulations for wild horses

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		The BLM has not been able to offer year round drilling with the 5% plan due to wild horse foaling.	under Alternative B (page 2-62). Impacts from such actions are described in chapter 4 of the Draft RMP/EIS. Under the Proposed RMP/Final EIS, BLM would entertain granting exceptions to wild horse stipulations under the procedures described in Appendix E.
Wild Horses	NW Colorado Oil and Gas Association	P 2-16 Sagebrush Habitat Fragmentation Proposal The oil and gas industry is looking at this proposal with an open mind and is interested in what it can bring to year-round drilling. As we understand this is voluntary to new and existing leases. From the companies I work with I have heard support for this proposal, there are some questions or concerns that I want to address. I mentioned previously in the wild horse section, this 5% disturbance is not offered to waive wild horse foaling stipulations. Year-round drilling would not apply. We need to find a way to have the opportunity for the operators to participate in the 5% surface disturbance threshold and have stipulations waive for year-round drilling in wild horse herd management areas.	The Draft RMP/EIS considers no seasonal stipulations for wild horses under Alternative B (page 2-62). Impacts from such actions are described in chapter 4 of the Draft RMP/EIS. Under the Proposed RMP/Final EIS, BLM would entertain granting exceptions to wild horse stipulations under the procedures described in Appendix E.
Wild Horses	Vermillion Ranch Limited Partnership	Pg ES-9 Wild horse AML must be forage capacity driven not arbitrary numbers 163-362	As described in chapter 3 of the Draft RMP/EIS (page 3-71), the wild horse AML was not developed arbitrarily, but was developed over years of monitoring and environmental analysis.
Wild Horses	Vermillion Ranch Limited Partnership	Pg 4-92 4.3.7.3 Fails to describe impacts from wild horses on other uses primarily grazing and wild life	Chapter 4 is organized to identify the impacts from each alternative on the resource under the identified header. Therefore, impacts from wild horse decisions on other resources, such as grazing and wildlife, are explained under those headings in chapter 4.
Wilderness Study Areas	Colorado 500	Wilderness Study Areas: We agree that WSAs are required by law to be managed to protect their wilderness characteristics. This does not, however, prevent all existing roads and trails from being open to use. Any roads and trails that existed at the time of the WSA designation apparently did not detract from the wilderness characteristics and their continued use should not either. There is no authority or reason to manage these areas as true Wilderness Areas when Congress has not designated them as such. We do not agree that it is necessary to close Cross Mountain and Diamond Breaks to OHV use to preserve wilderness characteristics.	See General Comment Response #16
Wilderness Study Areas	Colorado Off-Highway Vehicle Coalition	We agree that WSAs are required by law to be managed to protect their wilderness characteristics. This does not, however, prevent all existing roads and trails from being open to use. Any roads and trails that existed at the time of the WSA designation apparently did	See General Comment Response #16

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	(COHVCO)	not detract from the wilderness characteristics and their continued use should not either. There is no authority or reason to manage these areas as true Wilderness Areas when Congress has not designated them as such. We do not agree that it is necessary to close Cross Mountain and Diamond Breaks to OHV use to preserve wilderness characteristics.	
Wilderness Study Areas	Colorado Snowmobile Association	IMPACTS ON WILDERNESS STUDY AREAS (WSA) We take issue with several statements made in Section 4.3.11.1, on pages 4-120 through 4-123. Specifically, there are several statements made in the document in respect to "Allowing over-the-snow vehicle use would result in short-term, temporary impacts on the wilderness characteristics." or "Closing WSA to OHV use, including over-the-snow vehicles, would protect the wilderness characteristics in these areas." This is inaccurate since snowmobiling was allowed in wilderness study areas prior to such designation - without impacting or degrading the wilderness characteristics or the area would not have qualified as a WSA. Furthermore, many existing wilderness study areas on Forest Service lands across the West continue to allow snowmobiling today - without impacting the potential wilderness characteristics. There is a particularly disturbing and unsubstantiated statement on page 4-122 in paragraph 2: "Allowing over-the-snow vehicle use would result in short-term, temporary impacts to the wilderness characteristics in these areas from increased user conflicts from the noise and odors." Since there is no other information presented in this Draft EIS to substantiate this statement, it can only be a derivative of personal bias upon a member or members of the planning team. It therefore is inappropriate rhetoric that should be removed from this and subsequent documents. Today's snowmobiles are much cleaner and quieter than snowmobiles produced just a few years ago as a result of EPA regulation of the snowmobile industry, so this blanket accusation is off-base. There is also discussion several places in this section regarding that - if WSAs were ever released from wilderness study - OHV and over-the-snow vehicle use should continue to be prohibited. Wouldn't such an action require future NEPA planning actions to appropriately determine future uses should such a release action ever occur - which means such statements are clearly pre-decisional in nature? We suggest you consider revising language related to this topic in the document.	FLPMA Section 603(c) states that WSAs should be managed "...in a manner so as not to impair the suitability of such areas for preservation as wilderness..." This stated management objective for WSAs is supported by BLM's Interim Management Policy for Lands Under Wilderness Review (IMP) that allows for the designation of open snow areas, recognizing that such use will not impair the suitability of such areas to be preserved as wilderness in relation to impacts on naturalness or outstanding opportunities for primitive recreation or solitude. While OSV use may not result in long-term impacts to those characteristics, the presence of motorized vehicles will definitely result in a short-term loss of naturalness of the area, as stated in Draft RMP/EIS. WSAs do not need to be managed to eliminate all short-term impacts on wilderness characteristics, just those impacts that would "impair the suitability...for preservation as wilderness." Therefore, OSV use has been allowed in WSAs until Congress acts. Concerning impacts from the noise and odors of OSV use, BLM has evidence of such impacts through communications with various publics, public comments, and from the well publicized conflicts between OSV users and preservation interests in other parts of the west (e.g., Yellowstone and Grand Teton National Parks). A citation of such comments and news reports is not needed to support the claim that a recreationist seeking a wilderness experience would experience an interference of their goals (the academic definition of recreation conflict) in the presence of an OSV user. Part of the wilderness characteristics being protecting in Cross Mountain and Diamond Breaks (which are recommended to Congress as suitable for wilderness designation) are solitude and primitive experiences. Opening roads in these areas to

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			motorized uses would impact the users of these areas seeking wilderness experiences. Finally, WSAs will continue to be managed under BLM's IMP "until Congress either designates these lands as wilderness or releases them for other purposes" (IMP page 1). If released, the multiple use mandate of FLPMA would apply. Planning guidance directs BLM to "identify management direction for WSAs should they be released from wilderness consideration by Congress."
Wilderness Study Areas	Moffat County Commissioners	4) Right of way exclusion areas are not practical if WSAs are released by congress. Release of a WSA will likely return the land to its historic multiple uses or to a special management area that would have its own management plan at which time right of way avoidance areas would be determined. For instance, if Cold Springs was released to a National Wind Energy Area, it would be premature to assign a right of way avoidance area in this RMP. Moffat County requests the RMP simply defer addressing the WSA rights of way until they are released by congress.	WSAs will be managed under BLM's "non-impairment" standard (the Interim Management Policy for Lands Under Wilderness Review [IMP]) "until Congress either designates these lands as wilderness or releases them for other purposes" (IMP page 1). If released, the multiple use mandate of FLPMA would apply. Planning guidance directs BLM to "identify management direction for WSAs should they be released from wilderness consideration by Congress." If a specific decision by Congress were to conflict with the RMP, the plan would be amended.
Wilderness Study Areas	Timberline Trailriders, Inc.	Wilderness Study Areas: We agree that WSAs are required by law to be managed to protect their wilderness characteristics. This does not, however, prevent all existing roads and trails from being open to use. Any roads and trails that existed at the time of the WSA designation apparently did not detract from the wilderness characteristics and their continued use should not either. There is no authority or reason to manage these areas as true Wilderness Areas when Congress has not designated them as such. We do not agree that it is necessary to close Cross Mountain and Diamond Breaks to OHV use to preserve wilderness characteristics.	See General Comment Response #16
Wilderness Study Areas	Vermillion Ranch Limited Partnership	WSA and deferred areas must allow ground disturbance for range improvements and to sustain affected operators per livestock goals and objectives	Section 3.1.12.1, on page 3-80 of the Draft RMP/EIS, states that valid existing rights will be recognized in WSAs. Range improvements will be considered on a case-by-case basis and be subject to the interim management policy for WSAs as defined by FLPMA.
Wilderness Study Areas	Wilderness Society (The), et. al.	BLM should consider designating new Wilderness Study Areas. We are aware of the April 2003 settlement agreement (Utah Settlement) between Secretary of the Interior Norton and the State of Utah (in which BLM abdicated its authority to designate any additional Wilderness Study Areas (WSAs)), and we maintain that	BLM's authority for managing lands to protect or enhance wilderness characteristics is derived directly from FLPMA Section 202 (43 U.S.C. §1712). This section of BLM's organic statute gives the Secretary of the Interior authority to manage public lands for

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		this agreement is invalid and will ultimately be overturned in pending litigation. The federal court in Utah revoked its approval of the Utah Settlement, stating that its approval of the initial settlement was never intended to be interpreted as a binding consent decree. Recognizing that the court's decision undermined the legal ground for the Utah Settlement, the State of Utah and the Department of Interior have now formally withdrawn the settlement as it was originally submitted. See, Motion to Stay Briefing and for a Status Conference, September 9, 2005, attached. This casts serious doubt upon BLM's current policy not to consider designating new WSAs. Because the State of Utah and the Department of Interior have withdrawn their settlement and do not intend to seek a new consent decree, there is currently no binding consent decree and the BLM has not even issued any updated guidance seeking to continue applying this misguided and illegal policy. Even if the Utah Settlement is reinstated, not as a consent decree, it is illegal. The Utah Settlement is based on an interpretation of FLPMA §§ 201, 202, and 603 that is contrary to FLPMA's plain language. Section 603 did not supersede or limit BLM's authority under § 201 to undertake wilderness inventories, but rather relies explicitly on BLM having exactly that authority under § 201. Nor did § 603 in any way limit BLM's discretion under § 202 to manage its lands as it sees fit, including managing areas as § 202 WSAs in accordance with the Interim Management Policy (IMP). Every prior administration has created WSAs under § 202 and they plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative deserving of consideration in this NEPA process. The Utah Settlement is also illegal because the court in Utah lacked jurisdiction to prohibit designation of new WSAs nationwide, including in Colorado. Recommendations: In light of the most recent ruling and subsequent action of the parties, we emphasize that the BLM can and should continue to designate new WSAs in these planning processes, including the areas identified in the Citizens' Wilderness Proposal. Further, if BLM continues to exclude designation of new WSAs from consideration in the Little Snake RMP, it risks violating both FLPMA and NEPA, and jeopardizing the validity of the entire planning process.	multiple use and sustained yield. BLM has long acknowledged that FLPMA Section 603 (43 U.S.C. §1782) requiring a one-time wilderness review has expired. All current inventory of public lands is authorized by FLPMA Section 201 (43 U.S.C. §1711). In September 2006, the Utah District Court affirmed that BLM retained authority to protect lands it determined to have wilderness characteristics in a manner substantially similar to the manner in which such lands are protected as WSAs. Finally, the Utah v. Norton Settlement Agreement merely remedied confusion by distinguishing between wilderness study areas established under FLPMA §603 and those lands required to be managed under §603's non-impairment standard, and other lands that fall within the discretionary FLPMA §202 land management process.
Wilderness	Wilderness Society (The),	The Draft RMP should have also considered management alternatives that provide administrative protection for the wilderness	The Draft RMP/EIS did consider management of WSAs if Congress releases them from wilderness

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Study Areas	et. al.	characteristics of those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress; their wilderness characteristics are already acknowledged by the BLM.	study (see Draft RMP/EIS pages 2-41 through 2-44). This section has been re-worded to further clarify this management.
Wilderness Study Areas	Wilderness Society (The), et. al.	Existing WSAs: the RMP is also required to address management of the lands within these WSAs in the event that Congress decides not to designate them as Wilderness. We support the approach in the preferred alternative to manage the Diamond Breaks, West Cold Spring, Ant Hills, Chew Winter Camp, Peterson Draw and Vale of Tears WSAs in the same manners as the adjacent lands with wilderness characteristics and to manage the Cross Mountain WSA as an ACEC if they are not designated as Wilderness and released from protection by Congress. Draft RMP, pp. 2-151 – 2-154. However, as discussed above, it is important to manage these areas as VRM Class I, because VRM Class III is not sufficient to protect their naturalness; the management of the West Cold Spring WSA area should be VRM Class II.	Alternative D considers and analyzes managing the Cross Mountain and Diamond Breaks WSAs as VRM Class II if Congress releases them from wilderness study. It also considers and analyzes managing the West Cold Spring and Ant Hills, Chew Winter Camp, Peterson Draw and Vale of Tears WSAs as VRM Class I if Congress releases them from wilderness study. The commenter's preference for the Class I areas and Class II in West Cold Spring has been noted. Based on other management decisions in Alternative C that would restrict visually obtrusive surface disturbing activities in these areas (if Congress releases them from wilderness study), a more restrictive VRM Class was not deemed necessary to protect the area's visual resources. The commenter fails to provide any analysis or evidence that VRM Class II (or Class II in the case of West Cold Spring) would not be sufficient to protect the naturalness of this area given the other restrictive prescriptions.
Wildland Fire Management	The Nature Conservancy in Colorado	Executive Summary-Fire Management (p.ES-9) Delete the phrase, "…or in areas such as ecosystems where fire never played a positive role in its function." It is highly likely that fires played a role in any systems with vegetation at some point in time.	The Proposed RMP/Final EIS has been revised as recommended by the commenter.
Wildland Fire Management	The Nature Conservancy in Colorado	Chapter 2.5 Resource descriptions and management considerations, 2.5.8.2 Management Actions – Wildland Fire (p.2-30-31): Please provide greater clarity on how BLM will manage human-ignited, unplanned fires by completing the following: • In section 2.5.8.2 or in the glossary, define wildland fire, wildfire, wildland fire use, and prescribed fire using definitions from the National Fire and Aviation Executive Board Briefing Paper #03. See http://www.nifc.gov/fire_policy/pdf/3_kinds_of_wildland_fire_BP3_1_19%2005.pdf • Also define the following terms in section 2.5.8.2 or in the glossary: appropriate management response, conditional fire suppression, conditional response, unconditional response. • Adjust the language in sections 2.5.8.1 and 2.5.8.2 to ensure that they use the appropriate terminology. This is especially important for	Glossary definitions for fire-related terminology were added or updated in the Proposed RMP/Final EIS to reflect those contained in the Glossary of Wildland Fire Terminology, prepared by the National Wildfire Coordinating Group Incident Operations Standards Working Team and published by the National Wildfire Coordinating Group in October 2006. The terms 'conditional fire suppression,' 'conditional response,' and 'unconditional response' are self explanatory in that the management response to a fire event would be based on specific conditions (conditional) or not (unconditional). This is apparent in the Draft RMP/EIS language for Alternative B (page 2-30), as conditional fire suppression is associated with

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		Table 2-2 Fire management Units (p.2-31).	several conditions that would need to be considered when devising a suppression response (e.g., social, political, or ecological constraints such as air quality considerations, proximity to Class I air sheds or nonattainment areas, the presence of threatened or endangered species, or habitat considerations). Therefore, there is no need to add these terms to the glossary.

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