

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

***Travel and Transportation Management
Resource Management Plan Amendment for the WRFO***

Scoping Report

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U.S. Department of the Interior
Bureau of Land Management
Northwest District
White River Field Office
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BLM



TABLE OF CONTENTS

TABLE OF CONTENTS	i
1 Introduction	3
1.1 Background	3
1.1.1 Overall Strategy for Travel Management Planning in the WRFO	3
1.1.2 Purpose and Need for the RMP Amendment	3
1.1.3 Planning Area	3
1.1.4 Scoping Process	4
2 Summary of Public Comments	5
3 Planning Criteria & Planning Process	7
3.1 Planning Criteria	7
3.2 Additional Comments on the Planning Process	8
4 Issue Summary	9
4.1 Planning Issues	9
4.1.1 Recreation	10
4.1.2 Wildlife	16
4.1.3 Cultural	20
4.1.4 Paleontological Resources	20
4.1.5 Special Designations	21
4.1.6 Lands with Wilderness Characteristics	22
4.1.7 Temporary Closures	24
4.1.8 Exceptions	24
4.1.9 Oil & Gas	26
4.1.10 Realty	27
4.1.11 "Existing" Routes in the 2014-2016 Route Inventories	29
4.1.12 Soil Resources	29
4.1.13 Springs and Riparian Areas	29
4.1.14 Special Status Plant Species	30
4.1.15 Forestry and Woodlands	30
4.1.16 Visual Resources	30
4.1.17 Administrative and Permitted Use	31
4.1.18 Public Health and Safety	31
4.1.19 Helicopters	31
4.2 Analysis Issues	32
4.2.1 Non-Motorized Recreation	32
4.2.2 Wildlife	32
4.2.3 Socioeconomics Analysis	33
4.2.4 Rapid Ecoregional Assessments	33
4.2.5 Climate Change and Air Quality	34

4.2.6	Cumulative Impacts.....	34
4.2.7	Human Health and Safety	34
4.2.8	Soundscapes.....	35
4.2.9	Designation Criteria.....	35
4.3	Issues That Will Not Be Addressed in the RMPA	36
4.3.1	Outside of the Scope of the BLM's Jurisdiction	36
4.3.2	Outside the Scope of Travel Management	36
4.3.3	Travel Management Plans (Implementation Plans)	38
5	Anticipated Decisions to be Made	41
5.1	Guidance to Be Provided in the Travel Management RMPA.....	41
5.2	Guidance to Be Provided During Subsequent Implementation Planning	42
6	Valid Existing Management.....	42
7	Data Summary/Data Gaps	42
8	Future Steps in the Planning Process	43
9	Supporting Information	43
9.1	Glossary	43
9.2	Acronyms	48
	Appendix A. Map.....	49

1 INTRODUCTION

1.1 Background

1.1.1 Overall Strategy for Travel Management Planning in the WRFO

There are two levels of decision making in travel management planning. Designation of off-highway vehicle (OHV) areas as “open”, “limited”, or “closed” are land use planning decisions. The designation of individual roads, primitive roads, and trails are implementation decisions tiered to a Resource Management Plan (RMP). The White River Field Office’s (WRFO) travel management planning strategy is to conduct land use planning and implementation planning as separate steps.

Prior to beginning implementation-level (route-by-route) travel management planning, the WRFO plans to 1) complete the inventory (map) all the travel routes in the field office and 2) amend the travel and transportation management decisions in the 1997 White River Record of Decisions and Approved Resource Management Plan, as amended.

1.1.2 Purpose and Need for the RMP Amendment

The purpose of WRFO’s Travel and Transportation Management Resource Management Plan Amendment (hereafter, Travel Management RMPA) is to ensure that public lands are managed according to the principles of multiple use and sustained yield identified in the Federal Land Policy and Management Act of 1976 (FLPMA) while maintaining the valid existing rights and other obligations already established.

The need for the action is that the existing travel management decisions within the RMP can be confusing since they are not structured consistent with current BLM travel management planning guidance (i.e., Travel and Transportation Manual 1626 and Travel and Transportation Management Handbook H-8342-1). There are also decisions in the RMP that conflict with current BLM policy (e.g., CO-IM-2007-20 and H-8342-1) and do not account for changes in circumstances, such as increased management attention on greater sage-grouse habitat and lands with wilderness characteristics.

1.1.3 Planning Area

The Planning Area includes all lands, regardless of surface management or ownership, within the White River Field Office (WRFO) boundary shown in Figure 1. The Planning Area includes approximately 2.7 million acres of BLM, National Park Service (NPS), U.S. Forest Service (FS), state, and private lands located in northwestern Colorado. The Planning Area is located primarily in Rio Blanco County, with additional tracts located in Garfield and Moffat counties.

Management decisions made as a result of this planning process would apply only to BLM-managed surface acres (approximately 1.5 million acres) in the Planning Area.

1.1.4 Scoping Process

The BLM's land use planning regulations require scoping for RMP amendments (43 CFR 1610.2 and 43 CFR 1610.4-1). Scoping is both an internal process (BLM staff) and an external process (public) to identify planning issues to be addressed during the planning effort. Scoping also involves a public review of the preliminary planning criteria (which establish the "sideboards" for the planning effort) as well as the preliminary planning issues (which help guide development of the alternatives).

The BLM conducted scoping to meet both the requirements of NEPA and the National Historic Preservation Act (36 CFR 800.2).

1.1.4.1 Public Scoping

The BLM initiated scoping for the Travel Management RMPA by publishing a Notice of Intent (NOI) in the Federal Register and issuing a press release on October 16, 2015.

Public meetings (which were announced in the press release) were held in Meeker (at the BLM office) on November 16, 2015 and in Rangely (at the Recreation Center) on November 18, 2015; both meetings were held from 5:30-7pm. Six people attended the Meeker meeting and 15 people attended the Rangely meeting.

The Northwest Resource Advisory Council's (NW RAC) Travel Management Subgroup also held a meeting on November 16, 2015 from 1-3pm at the BLM office in Meeker. The BLM provided notice of the Subgroup's meeting in a Federal Register Notice published on October 23, 2015. Eleven members of the Subgroup and the NW RAC's Liaison attended the meeting. There were no members of the public in attendance.

1.1.4.2 Cooperating Agencies

In February 2015, the BLM invited other agencies to participate in the planning process as Cooperating Agencies and to attend a two-day training (held in March 2015) with BLM staff on travel management planning.

The BLM held a scoping meeting with the Cooperating Agencies on November 17, 2015, which was attended by the Town of Meeker, Town of Rangely, Rio Blanco County, Garfield County, Colorado Parks and Wildlife, and Dinosaur National Monument.

Table 1. Cooperating Agencies

Invited Agencies	Accepted (via a Memorandum of Understanding)
Town of Dinosaur	
Town of Rangely	X
Town of Meeker	X
City of Craig	
City of Rifle	
Garfield County	X
Moffat County	X
Rio Blanco County	X
White River Conservation District*	X
Douglas Creek Conservation District*	X
Colorado Parks and Wildlife	X
Natural Resource Conservation Service	
Dinosaur National Monument (National Park Service)	X
White River National Forest (U.S. Forest Service)	
U.S. Fish and Wildlife Service	

* Requested to participate

1.1.4.3 Consultation with Tribes

On October 21, 2015 the BLM met with representatives of the Ute Indian Tribe and the Southern Ute Indian Tribe to discuss the route inventory and the travel management planning process.

The BLM sent letters on January 25, 2016 to the following Tribes to initiate consultation:

- Hopi Tribe,
- Pueblo of Jemez,
- Eastern Shoshone Tribe of the Wind River Reservation,
- Ute Indian Tribe of the Uintah and Ouray Reservation,
- Southern Ute Indian Tribe, and
- Ute Mountain Ute Tribe.

2 SUMMARY OF PUBLIC COMMENTS

The BLM received 119 form letters, 28 unique comment letters from the public (including industry and other organizations), and 5 comment letters from Cooperating Agencies. The following agencies and organizations submitted scoping comments:

- Capital Trail Vehicle Association,
- Colorado Backcountry Hunters and Anglers,
- Colorado Parks and Wildlife,
- Conservation Colorado*,
- Friends of Northwest Colorado,
- Grand Junction Area Broadband of Great Old Broads for Wilderness*,

- Great Old Broads for Wilderness*,
- Mile High Broadband of Great Old Broads for Wilderness*,
- Northern San Juan Broadband of Great Old Broads for Wilderness*,
- Quiet Use Coalition*,
- Rangley Rock Crawlers,
- Rio Blanco County,
- Rocky Mountain Recreation Initiative*,
- Rocky Mountain Wild*,
- South Park Broadband of Great Old Broads for Wilderness*,
- The Wilderness Society*,
- Town of Rangely,
- Tri-State Generation and Transmission Association, Inc.,
- Uintah Mountain Club*,
- White River & Douglas Creek Conservation Districts,
- White River Electric Association, Inc., and
- WildEarth Guardians.

* Note: These organizations submitted a combined scoping comment letter.

Many of the comments from the public and Cooperating Agencies recognized that the public lands managed by the BLM are valuable for a variety of resources and uses and urged the BLM to develop a “diverse and balanced travel management plan”.

In regards to impacts that travel can have on various resources, commenters seemed most concerned about potential impacts to wildlife, especially to big game and greater sage-grouse, and requested that the BLM consider “leaving some areas undeveloped altogether to provide wildlife undisturbed areas to go”. There were also concerns about potential impacts to cultural resources, air quality, and an increase in noxious weeds.

Commenters emphasized the economic importance of BLM-managed lands and the need for access for recreation as well as for authorized uses of public lands, including maintaining rights-of-way, livestock grazing operations, and mineral development.

A wide variety of recreational uses of public lands were identified, including: hunting, fishing, motorized trail riding, mountain biking, hiking, and horseback riding. Commenters urged the BLM to develop a travel management plan that provides for “varied outdoor experiences”, including both motorized and non-motorized recreation.

The BLM was also encouraged to consider how decisions about motorized designations could indirectly affect other (non-motorized) forms of recreation where motorized travel is primarily used to access a specific location (such as a camping, picnic, or hunting site or a trail head).

3 PLANNING CRITERIA & PLANNING PROCESS

3.1 Planning Criteria

Planning criteria guide development of the plan by helping define the decision space (or the “sideboards” that define the scope of the planning effort); they are generally based upon applicable laws, Director and State Director guidance, and the results of public and governmental participation (43 CFR 1610.4-2).

The following preliminary planning criteria were included in the Notice of Intent:

1. The RMPA will be limited to making land use planning decisions specific to transportation and travel management.
2. The BLM will designate all public lands within the planning area as open, limited, or closed to off-road vehicle use, mechanized use, and/or non-motorized use.
3. Lands addressed in the RMPA will be surface lands managed by the BLM and will not include split-estate lands (i.e., private surface with Federal mineral estate).
4. The RMP Amendment, if approved, will comply with FLPMA, the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations at 40 CFR 1500-1508, Department of the Interior regulations at 43 CFR 46 and 43 CFR 1600, the BLM Land Use Planning Handbook (H-1601-1), the BLM NEPA Handbook (H-1790-1), the BLM Travel and Transportation Management Handbook (H-8342-1), and all other applicable BLM policies and guidance.
5. Land use decisions in greater sage-grouse habitat considered in the RMPA will be consistent with land use decisions in the Northwest Colorado Greater Sage-Grouse Resource Management Plan Amendment.
6. The RMPA will recognize valid existing rights.
7. The BLM will use a collaborative approach to planning.
8. The BLM will consult with Indian tribes to identify sites, areas and objectives important to their cultural and religious heritage.
9. The BLM will coordinate and communicate with state, local and tribal governments to ensure the BLM considers provisions of pertinent plans; seek to resolve inconsistencies between state, local and tribal plans; and provide ample opportunities for state, local and tribal governments to comment on the development of the amendment.
10. The BLM will address socioeconomic and Environmental Justice impacts of the alternatives.
11. Land use allocations made for Wilderness Study Areas (WSA) must be consistent with the BLM Management of WSA manual (BLM Manual 6330) and with other laws, regulations and policies related to WSA management.

12. The BLM will consider public welfare and safety when addressing fire management in the context of travel and transportation management planning.
13. The BLM will not consider creating any new special designations, such as Areas of Critical Environmental Concern, through this RMPA.
14. The BLM will conduct implementation (route-by-route) travel management planning in a separate effort subsequent to completing this RMPA.

The Field Manager adopted the following additional planning criteria based on internal and external scoping:

15. The BLM will develop a Programmatic Agreement with the Advisory Council on Historic Preservation and the Colorado State Historic Preservation Officer that identifies stipulations necessary to satisfy the BLM's responsibilities under Section 106 of the National Historic Preservation Act for both the RMPA as well as subsequent implementation travel management planning.
16. The BLM will make the draft alternatives available for public review prior to completing the impacts analysis for the Preliminary EA.
17. The BLM will provide the public with spatial data that depicts the alternatives (such as geographic information system (GIS) shapefiles or GoogleEarth KMZ files).
18. As committed to in the 2015 Oil and Gas Development ROD/Approved RMPA, the BLM will evaluate the Rocky Mountain Wild ACEC nominations, submitted on January 21, 2003, and on March 9, 2007, that are located within the boundaries of the WRFO to determine whether they satisfy the relevance and importance criteria consistent with the BLM's land use planning regulations. The BLM will evaluate these ACEC nominations prior to issuing a Decision Record for the Travel Management RMPA and will provide interim management for any areas found to meet the relevance and importance criteria.
19. The BLM will consider existing travel management designations from adjacent jurisdictions (e.g., other BLM offices, White River National Forest, Dinosaur National Monument) and strive for consistent management, as appropriate given consideration to resource values within the WRFO.

3.2 Additional Comments on the Planning Process

The following comments on the planning process were submitted by the public during scoping:

- The BLM should consider the following local land use plans in developing the Travel Management RMPA:
 - Rio Blanco County Trails Master Plan (2014); and
 - Rio Blanco County Land and Resource Use Plan (plan to finalize in 2016).
- The BLM should specifically include mitigation as part of its Travel Management RMPA per the Department of the Interior's Landscape Scale Mitigation Policy, Secretarial Order 3330 and Draft Manual Section 1794. The BLM should clearly outline its strategy for mitigating impacts from travel and transportation, and consider how travel and

transportation management can contribute to regional mitigation approaches in the context of addressing oil and gas development and other resource uses in the planning area.

- It is vital that the BLM clearly mark on all maps or proposed maps areas with existing restrictions on motorized use, such as: Wilderness Areas, WSAs, 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 comments will then be informed by the potential resource conflicts and the best opportunities for designating areas for non-motorized recreation. The 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 Travel Management RMPA should delineate Travel Management Areas for the full field office that will form the basis of future travel management plans. TMAs should be of an appropriate size to allow for impact analysis and comprehensive route designation across a landscape while ensuring the travel planning process is manageable for the agency and the public. Most TMAs should include various recreation uses, including motorized and non-motorized. The Travel Management RMPA should identify management goals and objectives for each TMA and setting other appropriate parameters to guide future route designations, such as resource objectives, recreation emphases and route density limits.
- The Travel Management RMPA should articulate an expedited schedule for completing comprehensive travel management planning for each TMA. The schedule should prioritize the identified TMAs based on: (1) areas with sensitive or important resources; (2) designated areas; (3) lands with wilderness characteristics; (4) high-use or high-conflict areas; and (5) other areas with high potential for current or future OHV-related impacts. Planning for top-priority TMAs should be instigated immediately following the decision notice for the Travel Management RMPA, with travel planning for all TMAs completed within five years.

4 ISSUE SUMMARY

4.1 Planning Issues

Planning issues are disputes or controversies about existing and potential land and resource allocations, levels of resource use, and related management practices. Issues include resource use, development, and protection opportunities for consideration in the preparation of the RMPA. These issues may stem from new information or changed circumstances, and the need to reassess the appropriate mix of allowable uses. Planning issues will be addressed in the RMPA and provide the major focus for the development of alternatives.

The following planning issues were identified by both internal (BLM's interdisciplinary team) and external (public) scoping comments.

4.1.1 Recreation

4.1.1.1 Open Areas

- *Is there a recreational need for an open area?*
 - The BLM should not designate OHV open areas. If BLM designates any open areas, the BLM must show that they meet a specifically-identified user need or demand in the field office, can be effectively managed, and are located to minimize adverse impacts to resources and conflicts with other recreational uses.
 - The Rangely Rock Crawling Park is well known as a premier rock crawling area and continues to grow in popularity.
 - The BLM could consider managing the park with the entire area open for OHV use, only the rock slabs as open for OHV use, or OHV use limited to designated routes.
 - There is a definite need for a recreational open area. I feel the Rock Crawling Club has done a good job of caring for the Rock Park and we would like to see the park continue as an open travel area.
 - While the Rangely Rock Crawling Park is an area with significant OHV use, the area has functioned successfully as limited to designated routes for some time.
 - The BLM should consider small open areas on erosive shale barrens like the already-disturbed Mancos shale valley northwest of Rangely.
 - If the BLM designates open areas, it should also balance that use by designating significant land as closed to motorized use in the same vicinity so that there are ample opportunities for quiet recreation and resource conservation.
 - The BLM should not designate open areas within sage-grouse Priority Habitat Management Areas or General Habitat Management Areas.

4.1.1.2 Non-Motorized Recreation (Areas Closed to OHVs)

- *How will the BLM provide for non-motorized recreation opportunities? How will the BLM ensure that management direction and decisions in the Travel Management RMPA do not deter or preclude future recreation planning that may include designating Special Recreation Management Areas or creating trail networks for non-motorized recreation?*
- *How will the BLM consider future development of non-motorized routes? How could the BLM develop a process that gives managers and the public a way of dealing with issues that don't exist yet?*

- *Should the BLM identify management goals and objectives for areas where primitive recreation experiences will be emphasized? Should Pike Ridge be managed as closed to motorized vehicles?*
 - All areas currently designated as closed to OHV use should be maintained as such in this current planning process. In addition, the BLM should inventory illegal and unneeded routes within these closed areas, reclaim those routes that are not needed for authorized use, and take proactive measures to reduce or eliminate illegal motorized use in these areas.
 - The BLM should manage BLM parcels in the eastern portion of the WRFO that are currently un-roaded (according to BLM’s recent travel route inventory) and that are immediately adjacent to a Roadless Area designated by the U.S. Forest Service in the 2012 Colorado Roadless Rule as closed. Designation of these areas as closed would be consistent with adjacent U.S. Forest Service management and would embody a holistic approach to cross-jurisdictional management for primitive recreation opportunities and wildlife habitat security. These areas include:
 - Three separate parcels of BLM land in the South Fork drainage of the White River in T1S, R91W and T2S, R91W that total approximately 715 acres and that are immediately adjacent to the “Big Ridge to South Fork B” Roadless Area.
 - Two separate parcels of BLM land on Buford Ridge and south of Bailey Lake in T1S, R91W that total approximately 955 acres and that are immediately adjacent to the “Big Ridge to South Fork A” Roadless Area.
 - A parcel of BLM land north of Rio Blanco County Road 8 and immediately east of Fawn Creek in T1N, R90W that totals approximately 485 acres and that is immediately adjacent to the “Morapos B” Roadless Area. Exclusion of a small portion of this parcel (~60 acres) to accommodate the presence of two county road segments would be necessary.
 - The BLM could manage lands with wilderness characteristics to provide opportunities for desirable recreation experiences for hikers, backcountry hunters, and other non-motorized uses. The BLM should consider converting two-track and other primitive routes to non-motorized trails in lands with wilderness characteristics, and fully close them to motorized use. Specifically, the BLM should manage the following areas to protect and enhance their primitive recreation values for non-motorized users: Unit 29-Big Ridge, Unit 1-Pike Ridge, Unit 10-Shavetail Wash, Unit 22-Coal Oil Gulch, Unit 20-Upper Coal Oil Rim, and Unit 4-Texas Mountain.
 - The BLM should manage lands with wilderness characteristics units identified as “Tier 1” in the Oil and Gas Development ROD/RMPA as closed areas. The WRFO has done a commendable job of identifying those parcels within the field

office that have the greatest potential to provide primitive recreation opportunities and wildlife habitat security. Consequently, these areas also overlap many of the areas identified in a proposed “Backcountry Conservation Area” designation recently championed by numerous conservation and sportsman’s organizations. While a decision to close these areas to all motorized use may be contentious now, we are confident these areas will be celebrated in the future as energy production, OHV recreation, and other uses become increasingly prevalent in the WRFO. There is a large and growing contingent of hunters and anglers that seek a quiet, non-motorized outdoor experience and a decision to manage the Tier 1 lands with wilderness characteristics units as closed to motorized use will show WRFO’s willingness to provide a diverse array of recreation opportunities.

- Pike Ridge provides good hunting opportunities. We use it for ATV riding and for hunting during the archery and rifle seasons. Public access to this BLM land area is very unique since it only has one ATV road leading into it. The road is very primitive in areas and has not been improved in a very long time. It has been reduced to not much more than a narrow ATV track. That is what we like about this area. Most ATV riders do not venture into this area so it is a very special area for our small family to hunt and explore. The topography only allows for public access on the single ATV road we use or you would have to pay a trespass fee to one of the private landowners. We are very concerned about what BLM is going to do about this road.
 - The BLM must give special management attention to areas with wildlife, scenic, recreation, and wilderness values and consider closing them to motorized use and/or otherwise restricting travel and transportation to protect important values. These areas include Dinosaur National Monument, Areas of Critical Environmental Concern, wilderness-quality lands, and important wildlife habitat.
 - The entire planning area should be managed under “closed unless signed open”.
 - We don’t feel the need for any more motorized travel restrictions. Let’s leave all of our backcountry routes open.
- *Should the “well pad” route in the Moosehead Mountain road closure area and the camping areas adjacent to the route to the gate be removed from the road closure area to provide for dispersed camping?*
 - *Should the BLM specify the process that will be used to designate non-motorized trail networks during future implementation planning efforts?*
 - The BLM should consider identifying opportunities to convert existing routes to non-motorized trails, which is less impactful than creating new trails and requires fewer resources. To minimize the impact from a non-motorized trail network, the BLM should prioritize existing linear features that are in low-conflict and low-impacts places on the landscape. In any travel designation, BLM should minimize impacts to sensitive resources such take the necessary steps to avoid impacts wildlife habitat and other sensitive resources.

- The BLM should evaluate and include additional criteria for designing non-motorized trail systems. Criteria could include that the trail system:
 - Addresses the needs of equestrians, hikers, climbers, and mountain bikers;
 - Protects diverse resource values from direct or indirect recreation impacts by promoting compliance with regulatory requirements and visitor use restrictions;
 - Results in sustainable systems;
 - Provides high quality experiences;
 - Serves the abilities of non-motorized recreational users;
 - Offers opportunities for looping, varying distances, linking between geographic areas and trailheads, and connecting to heritage and other educational resources.
 - Minimizes user conflicts by separating user groups whenever feasible; and
 - Limits the desire to venture off-trail.

- We are interested in developing or expanding large-scale, cross-jurisdictional routes like the Rangely Loop Trail, similar to the Kokopelli Trail from Grand Junction to Moab. We want to ensure that the BLM’s management decisions in the Travel Management RMPA are consistent with designations of route continuations in the adjacent jurisdictions.

4.1.1.3 Hunting

- *Are there areas that should be managed with seasonal closures on motorized vehicle use to allow for non-motorized hunting experiences?*
 - The BLM should limit OHV use to current roads during hunting seasons.
 - The stress level to the animals caused by repetitive use of OHVs is causing the animals to have unnatural behavior in their natural environment; which is resulting in unhappy public land hunters. The common complaints from a public hunter are; “There aren’t as many animals as their use to be”, “We saw some but they were too hard to get to”, and “The private land owners are harboring all the animals”. With the increase of OHVs in the past decade animals are forced to constantly be on the move to find a safe area during their most crucial moment of existence: breeding season. The constant pressure created by the OHVs is limiting the hunting success on public land.

 - The land is very delicate during hunting season due to increased moisture with the heavy traffic. The damages caused by OHVs are creating a number of problems to the land: erosion, destruction of vegetation, and littering in remote areas.

 - Hunters will still be able to use their OHVs on established roads but not “trails”. This will help keep animals on public ground. Wildlife is aware but comfortable to the sounds of traffic on current roads that are used year around. Once the sounds and physical appearance of the OHVs on hunting

“trails” the wildlife changes their natural behavior. Anyone who has a current hunting license physically present, is armed, or dressed in hunting gear would need to follow the rules.

- There are areas that should be managed with seasonal closures on motorized vehicle use to allow for non-motorized hunting experiences. Studies have shown how motorized travel moves big game away from roads making them more difficult to hunt. Big game needs security habitat and if motorized routes are deteriorating this habitat, then those routes need to be closed. Create more walk-in hunting areas by reducing the reliance on motor vehicles.
- The BLM should limit the use of OHVs during peak horn (shed) hunting. This is also a very critical time for the vegetation and animals. Herds are being harassed by horn hunters either pushing them to find sheds or run animals to produce sheds that haven’t fallen yet. The ground is very delicate during the spring; off road use of OHVs is having the same effects mentioned above during fall hunting seasons.

4.1.1.4 Over-the-Snow Travel

- *Should the WRFO limit motorized over-the-snow travel by vehicle type, season, snow-depth, or other conditions?*
 - Prescriptions for over snow travel should reflect those given to OHVs so that in open areas over snow travel is also open, in closed areas over snow travel is closed and in limited areas over snow travel is also limited.
 - A key component of minimizing impacts and conflicts associated with over snow vehicle use is ensuring the use occurs only when and where there is adequate snowfall. This is particularly important with climate change already leading to reduced and less reliable snowpack. Ensuring over the snow travel is limited to areas and times with adequate snowpack requires a three-part strategy. First, low elevation and other areas that typically lack regular and consistent snowfall should be designated as closed to over snow travel. Second, the BLM should clearly identify season of use restrictions based on wildlife needs, water quality considerations, average snow depth figures, and other relevant information. Finally, to account for variable snowpack within the season of use, the BLM should impose minimum snow depth restrictions consistent with the best available scientific information. Best available science currently suggests that snow depths of at least 18 inches are necessary to minimize impacts to water quality, soils, and vegetation and to buffer for variable snow conditions. Minimum snow depths should be monitored and enforced, with measurements taken at established locations that are representative of varying snow depths based on factors such as wind, orientation, slope, vegetation cover, etc. and depths reported regularly on the BLM’s website and posted at popular access points.
 - We recommend that use of over-the-snow vehicles be limited seasonally to designated roads and trails. In particular, we are concerned about the growing demand for shed antlers and the impacts that shed antler “hunting” has on big

game herds during a time of year when body condition and energy reserves are at their lowest. This late winter period (February through April) is critical to the survival of big game animals in northwest Colorado and unnecessary harassment can make the difference between survival and mortality. The BLM should adopt common sense measures (e.g., seasonal closures or limitations on cross-country travel) applied to over-the-snow vehicles that protects big game herds from late winter harassment.

- Big game wintering areas should be closed to snowmobiles.

4.1.1.5 Access Across Private Property

- *How will the BLM address management of routes that provide access to public lands but cross private property along a route?*
 - It is important to balance this planning effort with respect for private property rights by identifying any potential for trespass onto private land, especially where trespass onto private land is a reoccurring issue for the landowner.
 - Routes on BLM lands which have no current public vehicular access because of locked gates or signed closures where those routes cross private lands should not be designated in the travel management plan, as they do not serve a public purpose. All of these types of routes should be closed and gated (at the far end of the private property where they enter BLM lands), until public access is established through these private lands. Designating as open routes that have no current public access creates incentives for landowners to avoid making agreements or other concessions to reopen access routes to public lands, and creates islands of public lands that have little public benefit. The Travel Management RMPA should state that in cases in which public access is blocked after the designation of the route, that route will be prioritized for closure.
 - The Travel Management RMPA should include guidelines to clarify the conditions under which the BLM may authorize access to public lands from adjoining private lands. Other than for foot and horse uses, entry to public lands from private lands must comply with the designated transportation system and be limited to the same means of travel that the general public uses from public access points. By way of example, the Royal Gorge Field Office’s Arkansas River Travel Management Plan adopted guidelines for managing access between public and private lands that provide: “Access from private lands using any type of motorized or mechanized vehicle will only be allowed in cases where: 1. The use is authorized by a Right-of-Way or permit issued by the BLM; 2. Special or unique BLM management objectives are best achieved by allowing limited motorized access from private lands.”
- *How could the BLM improve public access to public lands surrounded by private land?*
 - When routes are bisected by private land, efforts should be made to gain easements to allow for public access. The BLM should strive to provide some sort

of limited motorized or non-motorized access to all public lands within the resource management area.

- There are number of parcels of public land that exist as “islands” surrounded primarily by private lands in the WRFO. Many of these parcels have opportunities for quality recreation experiences. The BLM should prioritize finding access into these islands of public lands by prioritizing non-motorized trail construction around these private lands. Negotiating access through private lands can be tricky and that access can be denied or changed as soon as that property changes owners or the owner changes their mind. However, many of these lands could be accessed through thoughtful non-motorized trail construction around these private land impediments through contiguous public lands. In particular, we recommend BLM consider the following places for this type of approach:
 - The public lands between the southern boundary of Dinosaur National Monument and CR 16 (Wolf Creek Road);
 - Lands between Highway 40 and Skull Creek and Willow Creek WSAs;
 - Land parcels in the Upper East Douglas Creek; and
 - Land around Colorow Mountain, Gray Hills, and Citadel Plateau.
- *Should the BLM identify (map) parcels that have no public or administrative access?*
- *Should the BLM identify areas that should be prioritized for improved public access (by either motorized and/or non-motorized means)?*
- *Are there areas that lack access in regards to public viewing opportunities within the Piceance-East Douglas Herd Management Area?*

4.1.2 Wildlife

4.1.2.1 State Wildlife Areas

- *Should the BLM manage the parcels within and adjacent to the Oak Ridge State Wildlife Area as closed or limited to designated routes?*
 - Colorado Parks and Wildlife (CPW) would prefer these parcels to be managed as limited to designated routes (with consideration for CPW’s travel restrictions in the Oak Ridge SWA) rather than the area being designated as closed. In the future, CPW may be interested in providing seasonal motorized access to the Oak Ridge SWA.

4.1.2.2 General or Big Game

- *Would seasonal closures be an effective means of reducing behavioral and physiological impacts to big game on important seasonal ranges?*
 - We recommend that the BLM identify areas for seasonal motorized travel closures in coordination with Colorado Parks and Wildlife to protect wintering big game. In particular, winter concentration areas and sever winter range are those areas that support the highest densities of wintering big game. Providing a reprieve from regular human incursion into those areas is a strategy being implemented on public lands in numerous areas for the sake of reducing stress on

wintering big game as well as reducing private landowner conflicts by providing refuge on public land rather than pushing animals onto private land. We believe that providing opportunities for refugia on public land will increase the social carrying capacity for big game in the WRFO by reducing damage issues on private land. This could conceivably be accomplished either at the current planning stage or in the future when site-specific (route-by-route) travel planning is completed.

- Areas where big game winter and give birth should be closed to motorized or mechanized use.
- The BLM should manage lands with wilderness characteristics units identified as “Tier 2” in the Oil and Gas Development RMPA with seasonal closures during big game hunting seasons and critical winter use periods by big game to meet the intended use of these areas as a balance between wilderness characteristics and other uses.
- *Should the BLM place restrictions on road density to reduce adverse impacts to big game distribution and indirect habitat loss?*
 - To our knowledge there has been no effort to implement route density decisions made in the 1997 RMP in the ensuing 18 years since signing. We are concerned that plan decisions made on paper will lack implementation in the field and we strongly suggest an implementation strategy with prioritization of areas to implement road density management be a part of the current planning process.
 - Since the mid-1990’s a large and rigorous body of scientific literature has been published on the effects of roads and OHV use on wildlife (particularly big game), concomitant with burgeoning OHV use on public lands. We emphasize that route density targets must be based on the best available science. Because the RMP is 18 years old, the BLM must not simply rely on the specific metrics identified in the RMP but rather ensure that route density objectives developed in the Travel Management RMPA are based on the most updated scientific information.
 - The BLM should set route density limits in the Travel Management RMPA to guide future route designations that minimize impacts to wildlife. Route density targets must be based on the best available science, and must meet scientifically-based thresholds or be combined with mitigating actions.
 - If BLM is unable to meet scientifically identified thresholds for important species habitat across the WRFO, then BLM must mitigate those impacts such as by designating wildlife corridors, conservation rights-of-way or other mitigating land use allocations.
 - The BLM should manage for reduced road density values of approximately 1 mile per square mile in the following areas:
 - BLM lands west of Hwy 139 and east of Evacuation Creek/Baxter Pass road, with a northern boundary that includes the Oil Spring Mountain

WSA boundary and a southern boundary that includes the WRFO boundary.

- All BLM lands on Big Ridge in Game Management Unit 21.
- The BLM should manage lands with wilderness characteristics units identified as “Tier 2” in the Oil and Gas Development RMPA with lowered road density thresholds (≤ 1 mile/square mile).
- The target of 3 miles/square mile for “remaining big game ranges” in the 1997 RMP is too high. Even WRFO’s own analysis and management strategy related to big game road avoidance suggests this density target is too high. The 2015 WRFO Oil and Gas Development RMPA embraces a 660 foot (200 meter) distance away from roads and facilities as eliciting strong avoidance by big game animals – a distance also supported in the literature. At this level, habitat effectiveness in an area with an open road density of 3 miles/square mile could be reduced by as much as 75% (envision 3 parallel 1-mile road segments even spaced within a square mile of habitat with each road being avoided by 200m). We argue that this target density of open roads should be used as a maximum rather than an average in all areas except where OHV or other motorized uses are being specifically emphasized.
- While WRFO did a commendable job of identifying and prescribing management for lands with wilderness characteristics throughout much of the planning area, we are disappointed that no areas in the >500,000 acre Piceance Basin, Colorado’s well publicized “Mule Deer Factory,” were found suitable for retention of wilderness values. The scientific literature is clear that roadless/non-motorized/undeveloped areas provide necessary habitat security and refugia for mule deer, elk, and other wildlife, particularly during winter and parturition periods. We hope that BLM is willing and able to find opportunities to limit effective road densities and restrict seasonal motorized uses through a variety of means at the site-specific planning level for this important area, especially as the status of mule deer continues to be on the forefront for so many entities.

4.1.2.3 Greater Sage-Grouse

- *Should the WRFO implement seasonal or permanent road or trail closures in greater sage-grouse priority habitat management areas (PHMAs)?*
 - The potential for recreational activities to negatively affect habitat exist. The BLM should consider specific geographic and temporal protections for priority and general habitat management areas while not imposing undue restrictions on recreation opportunities.
 - Greater sage-grouse priority habitat management areas should be closed. Sage-grouse general habitat management areas should be managed as limited areas (no open areas).
 - Wintering habitats for sage-grouse should be seasonally closed to all vehicular access between November 30 and March 15.

- Roads contribute to habitat fragmentation, result in vehicle traffic that directly disturbs wildlife (causing stress and/or displacement from otherwise suitable or even crucial habitats), and dictates to a significant extent the distribution of human activity on the landscape. With this in mind:
 - open vehicle route density should be limited below thresholds at which significant impacts occur;
 - open routes in close proximity to key habitats should be permanently closed and reclaimed; and
 - seasonal closures should be employed to further reduce disturbance and displacement of sage-grouse.

- *Should the BLM place restrictions on road density to reduce impacts to sage-grouse?*
 - Road densities are an issue because sage-grouse avoid habitats adjacent to roads. Open vehicle route density should be limited to a maximum of 0.7 linear miles per square mile in (and immediately adjacent to) sage-grouse key habitats, including nesting, brood-rearing, and wintering habitats. This road density should be applied as a maximum density in priority and general habitat management areas. In areas that already exceed this threshold, existing roads should be decommissioned and re-vegetated to meet this standard on a per-square-mile-section basis.

- *Should the BLM include preliminary travel planning criteria for sage-grouse habitat in the Travel Management RMPA to guide future implementation travel management planning in the WRFO?*
 - The BLM should outline preliminary travel planning criteria to guide future travel management planning in the WRFO. Those criteria should include the additional management actions adopted in the Northwest Colorado Greater Sage-Grouse RMPA specific to route designations and construction. These include:
 - Use existing roads or realignments whenever possible;
 - Construct no new roads if the biologically significant unit (Colorado populations) and proposed project analysis area (Colorado Management Zone) is over the 3 percent disturbance cap; and
 - Conduct restoration of roads, primitive roads and trails not designated in travel management plans.

 - The BLM should adopt the following measures in the plan amendment:
 - New primary, secondary, or high-activity roads should be excluded within 1.9 miles of leks;
 - All new road construction or location should be excluded within 0.6 miles of leks (with no exceptions, waivers, or modifications);
 - Limit new road construction to realignments of existing routes where realignment has minimal impact on sage-grouse;
 - Require travel management planning to designate routes within Core and Focal Areas within 5 years of plan amendment adoption; and

- Existing roads within 5.3 miles of sage-grouse leks should be administratively closed and gated from March 1 through June 30 to minimize disturbance to breeding and nesting habitats.
 - Distance from development and density of development are key factors in sage-grouse winter habitat use. The BLM should apply the following restrictions on development in designated winter habitats:
 - For valid existing rights BLM should impose a 3% surface disturbance limit calculated per square mile section,
 - No Surface Occupancy within 1.75 miles of the edge of wintering habitats, and
 - No high-volume roads within 1.9 miles of wintering habitats.
 - For sage-grouse priority habitat management areas, the BLM needs to require the same “white-arrow” approach as used on many National Forests, in which motorized routes are closed to motorized use unless specifically posted as open.
- *Should the BLM allow administrative routes (those that are limited to authorized users) in sage-grouse habitat?*
 - Special Use Permits need to be limited in priority habitat management areas to activities that have neutral or beneficial impacts on sage-grouse.

4.1.3 Cultural

- *Should the BLM close or reroute all roads that are adversely affecting eligible sites?*
 - The BLM should consider closing Canyon Pintado and the access road from Highway 139 plus “exit” routes further south, north, and east from the canyon. The BLM should also consider including in the Travel Management RMPA a budgeted plan for monitoring and a public report of closure terms and site health.
 - Areas around fragile/sensitive archaeological sites should be closed to motor vehicle traffic as much as possible. Some sites are near established roads or even highways. These sites should be protected from motor vehicle traffic as much as possible. Damage/vandalism has resulted to archaeological sites that are too easily accessed by roads. Canyon Pintado needs/deserves as much protection as possible.
 - Archaeological sites should be protected.
- *Should motorized vehicle travel within the Texas-Missouri-Evacuation, Mellen Hill, and Dragon Trail cultural resource areas be limited to designated roads to protect significant “at-risk” cultural resources?*

4.1.4 Paleontological Resources

- *Should the BLM close areas near important fossil locations?*

- Large fossil areas could use as much protection from easy access as possible. There are large deposits of dinosaur bones, for instance, in the Rangely area. Such sites are often affected by fossil removal. Wherever possible, sites like these should be closed to vehicle traffic.

4.1.5 Special Designations

4.1.5.1 Wilderness Study Areas

- *How should the BLM manage recreational motorized or mechanical vehicle use in Wilderness Study Areas (WSAs)?*
 - Recreational motorized or mechanical vehicle use in WSAs is only allowed when the use is consistent with applicable laws and meets the non-impairment standard. This requires BLM to demonstrate that all uses and facilities within the WSA are both temporary and do not create a surface disturbance. The agency may designate “primitive routes.” However, primitive routes may not be improved or maintained since this would create additional surface disturbance. In addition, primitive routes will not be made a part of the transportation system unless: (1) The routes are designated as non-motorized and non-mechanized trails, or (2) Congress releases the WSA from Wilderness consideration.
 - We would like to emphasize that continued motorized use in WSAs can damage wilderness suitability and therefore should be prohibited. The BLM should take the opportunity in the Travel Management RMPA to close damaging routes, including specifically those in WSAs.
 - In order to meet the non-impairment standard as required by the Federal Land Policy and Management Act, primitive routes in WSAs should be considered for closure and restoration in the Travel Management RMPA and future implementation efforts.
 - The BLM should close as much ground as possible in WSAs. Horseback and foot travel in such areas is preferable.
 - The BLM should consider if these areas need to be closed to mechanized use.
- *What types of motorized or mechanized use within a WSA should be permitted for historic use by livestock grazing permittees?*
 - The use of motor vehicles or mechanical transportation is restricted to those primitive routes in the WSA that are open to the general public. Exceptions are to maintain range improvements in the same manner and degree as before October 21, 1976 or for any emergency feeding authorized by the BLM. This does not include using mechanized equipment to go and check on livestock.
- *How should the BLM manage “cherry-stemmed” routes in WSAs?*

- *Should the Travel Management RMPA address how management of motorized vehicles could change if Congress released the WSAs from further study?*

4.1.5.2 Areas of Critical Environmental Concern

- *Should Areas of Critical Environmental Concern (ACECs) be designated as closed or limited to motorized travel?*
 - Keep all ACEC areas as is. These areas are minimal when it comes to the acres in the WRFO. These areas house a number of plant and animal species that have adapted and are living (mostly) undisturbed in these areas. Opening these areas to more travel could be detrimental to the species that continuously occupy them.

4.1.6 Lands with Wilderness Characteristics

- *What types of uses are appropriate (e.g., motorized, mechanized, horseback) within lands with wilderness characteristics?*
 - The area designations and subsequent route designations should be consistent with the management for lands with wilderness characteristics where the BLM is actively managing for wilderness character, and should also avoid impacts to other areas where wilderness characteristics exist. The BLM should strive to convert routes within lands with wilderness characteristics units to non-motorized, quiet use thereby increasing the opportunity for quiet recreation in the management area.
 - Several units in the field office have relatively few existing routes within their boundaries, and what few routes do exist within their boundaries are relatively rough and lightly traveled and often have no identified purpose. This on-the-ground reality is a major reason BLM was able to identify and document exceptional wilderness characteristics in these units, including outstanding opportunities for primitive and unconfined recreation. These units—including Coal Ridge – Unit 21, Upper Coal Oil Rim – Unit 20, Moosehead Mountain – Unit 26, Bull Canyon South and North – Units 33 and 34, Willow Creek South – Unit 32, MF Mountain – Unit 27, Big Ridge – Unit 29, Whiskey Creek – Unit 2, Pike Ridge – Unit 1, Bluejay Creek – Unit 7, Banta Ridge – Unit 30, and Raven Ridge – Unit 16—should be closed to motorized use in the Travel Management RMPA to protect their outstanding wilderness characteristics.
 - Not all lands with wilderness characteristics units need to be completely closed to motorized use. Several units within this planning area currently support somewhat regular motorized travel on existing routes within their boundaries, and because of size, location, topography, vegetation or other mitigating factors, allowing continued motorized use on designated routes in these areas will likely not negatively impact the wilderness characteristics in these areas. Examples of these units include Blair Mountain/Greasewood Gulch – Unit 13, North Colorow – Unit 19, Texas Mountain – Unit 4, Ernie Howard Gulch – Unit 8, Galloway Gulch –

Unit 5, Barcus Creek – Unit 11, Pinto Gulch – Unit 24, Hammond Draw – Unit 15, Shavetail Wash – Unit 10, and Brushy Point – Unit 3.

- Lands with wilderness characteristics should be managed in same manner as a WSA.
- The BLM should allow over the snow use in lands with wilderness characteristics units.
- The BLM should consider opening up the Moosehead area from closed. We would appreciate it if the BLM could give us access to more lands that we can't access due to fences. We would like for all of the area around Dinosaur to stay open.
- The BLM should consider if careful travel management closures or limits in lands with wilderness characteristics units in the Piceance Basin (Mesaverde Play Area) could protect herbaceous plant remnants or big game seasonal routes.
- Because of the outstanding wilderness characteristics identified by the BLM in all lands with wilderness characteristics units within the field office, designating any routes in these areas should only occur if those routes have a clear purpose, have a strong public demand, and can be shown that doing so will not degrade or eliminate the wilderness characteristics identified by BLM. Designated routes in lands with wilderness characteristics units should be few in number and should be clearly designated as primitive, unmaintained routes; no mechanical maintenance of these routes should be allowed or implied.
- Lands with wilderness characteristics provide outstanding opportunities for primitive recreation, such as hiking, camping, hunting and wildlife viewing. As part of travel and transportation management planning, the BLM should set management direction for these areas that emphasizes non-motorized recreation activities and protects those experiences in the WRFO. In the management goals and objectives for Travel Management Areas that include lands with wilderness characteristics, the BLM should prioritize protecting and enhancing backcountry recreation experiences and designating non-motorized trail networks as an implementation activity.
- *Should construction of new roads be allowed within lands with wilderness characteristics units? Should this differ depending on whether the unit was identified as Tier 1, 2, or 3 in the Oil and Gas Development RMPA?*
 - No new roads should be allowed in areas where the land has wilderness characteristic and allow only foot and horseback access only.
 - Areas with wilderness characteristics should not have new roads (motorized or mechanized travel).
 - The BLM has yet to consider whether to manage the recently-inventoried lands with wilderness characteristics units for protection of their wilderness

characteristics through a public process. If the BLM does not comprehensively address lands with wilderness characteristic management in the Travel Management RMPA, then the BLM should not authorize actions that would impact wilderness characteristics and could preclude an agency decision to manage these areas for protection of their wilderness characteristics in the future, such as constructing new roads.

- *How should the BLM manage “cherry-stemmed” routes in lands with wilderness characteristics units?*
 - We believe the BLM should review current non-Wilderness areas that could be reclassified, reopened, or have cherry-stemmed routes designated for connectivity and/or touring opportunities. Many 1980-1990s-era Plans used non-Wilderness "non-motorized" classifications to restrict or prohibit summer wheeled recreation. In many cases, OHV was simply not at the table or given substantive consideration during these programmatic planning efforts. In some areas these classifications such as "Near Natural" or "Semi-Primitive Non-Motorized" had the effect of functionally banning OHV use including designation of cherry-stemmed routes.

4.1.7 Temporary Closures

- *How will the BLM address temporary route closures?*
 - The BLM has authority to institute temporary route closures to protect public lands and resources. The BLM must immediately close any areas where the agency finds that OHVs are or will cause considerable adverse effects upon natural or cultural resources. The Travel Management RMPA should address temporary closures, including defining thresholds for when OHV-related closures will take place. The Travel Management RMPA should also describe the resources, uses, situations, and locations likely to be adversely affected by OHV use. If the BLM analyzes the potential for temporary closures properly, then there will be no further need for additional NEPA analysis and the temporary closure can be issued with a Determination of NEPA Adequacy (DNA).
 - Any travel management based on a wet weather closure strategy should allow for native surfaced trails and roads to be open when soil conditions/lack-of-rainfall permits. If a wet weather closure is needed, the implementing temporary order should be for the shortest period of time rather than a longer time period. In NEPA, it is always easier to extend a short closure versus repealing a longer closure.

4.1.8 Exceptions

- *Should the WRFO provide exceptions for off-road motorized travel in limited areas for the purposes of camping, firewood gathering, or retrieval of downed big game?*

- There should/should not be exceptions made for camping, firewood gathering, or big game retrieval.
- All limited areas should require vehicle use confined to the “active tread” of use. If driving off to camp, vehicular access cannot exceed 100ft from right-of-way.
- The Travel Management RMPA should allow parking immediately adjacent to designated routes only, and designate short spur routes leading to dispersed campsites.
- The BLM should prohibit cross-country motorized/mechanized travel for game retrieval, with the exception of hand-held wheeled game retrieval carts.
- A decision in WRFO’s current 1997 RMP states “hunters may use motorized vehicles to retrieve downed big game as long as damage to resources does not occur.” We feel strongly that this allowance needs to be eliminated in this current planning process. It is not equitable to all public land users (e.g., Why should hunters be allowed to use motorized vehicles off of designated routes when all other users are not?) and the standard that must be met to avoid “damage to resources” is extremely vague and generally unenforceable. There is also no limit on the distance off of existing roads/trails that may be traveled for this purpose and it creates a de facto Open area for hunters. While we completely support exceptions for handicapped hunters and other similar situations, we feel strongly that the existing network of routes within the WRFO (literally thousands of miles) provide sufficient access for fair chase hunting and reasonable accommodation for human-powered retrieval of harvested big game back to an existing road or trail.
- *Should the WRFO provide exceptions for physically challenged individuals to travel off-road?*
 - The BLM should review and revise current RMP language as it pertains to giving travel exceptions to physically challenged hunters.
 - If the WRFO provides exceptions for physically challenged individuals to travel off road, how would the level of their challenge be confirmed? Through permit, or what process?
 - All WSAs should be permanently closed to vehicles, no exceptions for disability.
 - We are old. It has been a long time since we could hike or ride horseback and we don’t even drive on jeep trails. But we know there are too many roads in this area. There should be places where those who love silence can find it. We do not want any route opened or “improved” so we can get there in motorized chairs. We saw what we could while we could.
 - I would agree with some exceptions for physically challenged people but within reason. We all have limitations to what we can do and where we can go so we shouldn’t expect every area be made accessible for everyone even physically challenged people.

- Our population is also aging and more require the assistance of motorized transportation. I spent much of my early years hiking on public lands. In my 60's I am no longer able to hike on most trails. I still love to get out and travel on public lands but need to use an ATV or UTV. I am not looking for an "extreme" experience. I prefer that the views and solitude provide the breathtaking moments, not travelling on challenging trails at high speeds. I obey the regulations and have helped to maintain trails closer to home to help keep them open to the public. While many of us are using motorized transportation that doesn't mean we don't value the ability to get away from the crowds and enjoy the great outdoors and viewing wildlife in their natural settings.
- My biggest concern is that the BLM will be discriminating against the handicap, the elderly, and the poor. Those that have enjoyed our federal property for so long but are unable, due to handicap or age, to walk that distance to visit the areas where they have hunted, camped, and enjoyed for so many years. If the existing roads are closed, those without the funds to rent or own horses will be further and further restricted from enjoying the natural resources our federal property has to offer. I urge you to please consider those who still savor our natural resources but no longer have the physical ability to access these areas if not by motorized transportation.
- *Should there be seasonal exceptions to travel off-road for the collection of firewood, Christmas trees, or posts and poles?*

4.1.9 Oil & Gas

- *Should travel on existing energy and mineral development access roads be restricted to authorized users? Should all existing energy and mineral development access roads be reclaimed to approximate the natural environment, or should some be maintained to provide public access to various regions and what level of access or use should be allowed?*
 - Access on energy and mineral roads should be limited to authorized use only. These roads were created by a private entity with the sole purpose of reaching a single resource and they are limited to that one use only. If the public wishes to reach these areas they should have to go through the same process that every company that built a road or well site went through, including paperwork and fees. If public use is allowed, who's responsible for maintenance? Limiting the roads to authorized users will keep the road intended what it was built for.
 - Energy access roads must be closed and reclaimed as spelled out in the leasing documents.
 - We support carrying forward language from the WRFO's 2015 Oil and Gas Development RMPA that limits all newly constructed oil and gas roads to authorized use only. There is simply no need to have open public access to additional road spurs where road densities are already high due to energy development. However, we recommend the decision be given less ambiguity than

is offered in the Oil and Gas Development RMPA (it states “Well access routes would generally be unavailable for public vehicular access...”) by stating unequivocally that general public use is prohibited on new oil and gas roads. We understand that implementation and enforcement will be difficult, but it must become a hallmark of future management if >1,000 well pads will potentially be constructed in the WRFO over the next 20 years, as allowed for in the Oil and Gas Development RMPA.

- The BLM should not automatically assert that roads developed for oil and gas activities are not also appropriate to meet transportation and recreation needs for other public lands users. In fact, prohibiting transportation and recreation access on oil and gas roads would likely lead to a severely exaggerated route network that would result in increased cumulative impacts to other resources. The BLM should include roads authorized under the oil and gas amendment as the agency analyzes the necessary route network and identify under what circumstances roads created for oil and gas activities would also serve public transportation purposes. In those circumstances, the BLM should designate the route for public use and identify whether it would be more appropriate for the designation to only last until reclamation occurs for the oil and gas project, at which time the route would be closed and reclaimed, or if the route should serve a longer term public need.
 - Travel on existing energy and mineral development access roads should not be restricted to authorized use when such travel allows trail loops to be created and accessed.
 - In areas where there is existing oil and gas road development, use of existing roads to access areas with mountain bike, river access and hiking trail development potential characteristics should not be discouraged.
- *Should the BLM permit geophysical (seismic) surveys to use vehicles such as drill buggies and vibrate trucks in areas closed or limited to off-highway travel?*

4.1.10 Realty

- *How will the BLM permit access to maintain rights-of-way (ROW)?*
 - Access is crucial for the utility companies’ ability to maintain reliable service. Many power lines are radial feeds, which mean there are no alternate or looped electrical feeds to back-up these lines in the event of an outage. Therefore, in the event of an outage, it is critical that line crews are able to safely and quickly access these facilities to repair the damage and restore power to customers. Down-line access within ROWs is often not feasible given terrain and sensitive resource constraints. Access requirements (size and dimensions) are dictated by the size and capability of maintenance equipment that is needed to safely access and set up within ROWs. The closure of certain roads and access points would significantly impede this process and may affect the ability to restore power and address safety concerns. Using existing access roads not only allows us to “get the lights back on” but will also limit potential resource damage that would ensue

from constructing new temporary access road that has not been properly sited or engineered to reach the affected line. In these cases, disturbance to BLM land could be significant as well as the required reclamation to restore the areas disturbed during the emergency event.

- Many of our older power lines and facilities may or may not have “authorized” access incorporated into our ROW grants, though the BLM has acknowledged and permitted our existing roads for years to maintain our infrastructure. For newer applications for ROW grants, we request and delineate our chosen ingress/egress points for our lines. To update all of our numerous permits would be a daunting and arduous task given our limited resources. We would request that access roads proposed for closure to the public that are currently used to maintain power lines be left open specifically for the utility companies’ administrative access.
- We understand the importance of managing, and in some cases limiting, access to public lands to protect crucial natural and cultural resources. We are open to working with the BLM to close roads currently utilized for transmission maintenance and vegetation management activities to the general public, but maintaining access for administrative use only. This generally can be accomplished through closure devices or appropriate signage.
- The Federal Energy Regulatory Commission mandates that electric utilities must not only patrol all power lines on a regular basis, but we must also maintain our ROWs by clearing incompatible vegetation that may grow-in, fall-in, or blown into our lines which may result in outages or risk of wildfire. Vegetation management is another reason electric utilities require permanent access to our electrical facilities on BLM lands.
- *Should right-of-way exclusion areas also be managed as closed areas? What types of uses are appropriate (e.g., motorized, mechanized, horseback) within right-of-way avoidance and exclusion areas?*
 - Right-of-way exclusions should be managed as closed only allowing access as needed.
 - Areas that are exclusion or avoidance areas for land use authorizations under the 2015 Oil and Gas Development RMPA should similarly have travel and transportation restrictions put in place to protect their resource values.
 - Areas that BLM is managing as exclusion areas for land use authorizations in the 2015 Oil and Gas Development Amendment are:
 - Wilderness Study Areas;
 - South Cathedral Bluffs, Raven Ridge, Coal Draw, and Black’s Gulch ACECs;
 - Moosehead Mountain;
 - Tier 1 lands with wilderness characteristics that will be managed to protect wilderness characteristics as a priority over other multiple uses; and

- Within 330 feet of occupied habitat for federally listed and proposed plants.
- Areas that BLM is managing as avoidance areas for land use authorizations in the 2015 Oil and Gas Development RMPA are:
 - All areas included in NSO or CSU stipulations;
 - Areas within 330-660 feet of occupied habitat or within 660 feet of suitable habitat, or within critical habitat for federally listed, proposed or candidate plant species;
 - Harpers Corner Road; and
 - Canyon Pintado National Historic District.

4.1.11 “Existing” Routes in the 2014-2016 Route Inventories

- *Should the BLM provide interim management that areas limited to designated routes will be limited to existing routes (as depicted in the 2014-2016 route inventories) until implementation (route-by-route) travel management plans are completed? Should the BLM identify a process for considering any “existing” routes that were inadvertently omitted from the 2014-2016 route inventories?*
 - No additional routes created after the start of this EA should be considered as “existing.”
 - The BLM’s route inventory should reflect that the agency has recently determined that none of the routes in the lands with wilderness characteristics units meet the definition of a road. Any and all motorized/mechanized trails in lands with wilderness characteristics units must be classified as primitive routes per BLM Manual 1626.
 - User-created routes should be distinguished from legitimate roads on travel planning maps, and, where they were created illegally, should be excluded from the baseline inventory.

4.1.12 Soil Resources

- *Should travel routes transecting large areas of sensitive soils (saline > 16 mhos or slopes > 35 percent), be seasonally or permanently closed?*
- *Should travel route density be managed to limit soil compaction in watersheds susceptible to high intensity monsoonal rains and destructive flash floods?*
- *Should the BLM consider seasonal closures to reduce erosion, rutting of routes, and widening of routes (to avoid rutted areas) during periods when roads and soils are saturated?*

4.1.13 Springs and Riparian Areas

- *Should the BLM consider seasonally or permanently closing roads that are negatively influencing spring and riparian areas? Specifically, should the BLM close travel routes that:*

- *transect groundwater expressions (springs);*
 - *parallel intermittent or perennial channels and are directly impacting natural stream migration;*
 - *are located primarily within a mapped floodplain;*
 - *are deeply incised or bermed (due to poor design or years of improper maintenance) and promote sediment laden stormwater runoff; or*
 - *transect hillslopes with observed instability (mass wasting, creep, deeply incised surface erosion)?*
- *Should travel routes to springs be seasonally or permanently closed to promote the restoration or maintenance of springs that support diverse riparian habitats critical for special status plants, wildlife, or livestock?*
 - *Should modification of springs or wetlands be permitted for:*
 - *the maintenance or upgrade of existing routes; or*
 - *the construction of new routes?*
 - *Should storm damage risk reduction treatments (i.e., armoring, slope stabilization, or road maintenance) be permitted to prevent the natural meandering of a stream from cutting away the bank and encroaching on an existing travel route? Or should travel routes in close proximity to intermittent or perennial streams be permanently closed?*

4.1.14 Special Status Plant Species

- *Should the BLM manage occupied habitat for plant species listed under the Endangered Species Act as closed to motorized travel?*
- *Should the BLM manage occupied habitat for BLM sensitive species as limited or closed to motorized travel?*
- *Should the BLM allow any new routes within 100 meters of occupied habitat for special status plants?*

4.1.15 Forestry and Woodlands

- *Should the BLM allow any new routes in close proximity to old-growth forests or woodlands?*

4.1.16 Visual Resources

- *Should the BLM consider any open areas within Visual Resource Management II areas?*
 - *The objective Visual Resources Management Class II areas is to retain the existing character of the landscape, where the level of change should be low, and management activities may be seen, but should not attract the attention of the casual observer and any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.*

4.1.17 Administrative and Permitted Use

- *Should administrative use be required to follow the same vehicle size limitations as the public?*
 - *Establishing different vehicle size limitations for the public and administrative users on the same route can lead to confusion about who needs to follow which limitation and can undermine the BLM's rationale for the need for a vehicle size limitation for the public. It also creates an added layer of complexity for enforcement of the rules for that route in regards to investigations of potential violations of vehicle size limitations.*
- *Should Special Recreation Permit holders (such as outfitters) be allowed to use existing travel routes that they have access to through private property but the public does not have access to in order to conduct their business operations?*
- *Should the BLM provide exceptions to allow for off-road (cross-country) travel using motorized vehicles for activities such as:*
 - *wildlife capture work conducted by Colorado Parks and Wildlife;*
 - *weed treatments;*
 - *monitoring and repairing range improvements; and*
 - *checking or gathering livestock?*
- *How should the BLM provide access to maintain range improvements and check on livestock in closed areas or areas with seasonal closures?*
- *Are there areas that lack access in regards to management of wild horses? Will the BLM negotiate access on private lands for wild horse management?*

4.1.18 Public Health and Safety

- *Should the BLM restrict public access to areas currently or historically used for illegal dump sites?*
- *Should the BLM restrict public access to areas where known public health and safety issues exist (such as areas with potential exposure to hydrogen sulfide gas)?*
- *Is there a need for the BLM to increase or decrease its current transportation network to ensure public safety (such as for search and rescue operations or fire fighting)?*

4.1.19 Helicopters

- *How can the BLM provide for helicopter use necessary for activities such as:*
 - *wild horse gathers;*
 - *wildlife capture work conducted by Colorado Parks and Wildlife;*
 - *wildland fire operations and prescribed burns; and*
 - *geophysical (seismic) surveys (including heli-portable drilling and moving equipment and personnel)?*

- *How will the BLM manage landing zones for helicopters (especially in regards to fuel truck access)?*

4.2 Analysis Issues

The Council on Environmental Quality’s regulations state that NEPA documents “must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail” (40 CFR 1500.1(b)). While many issues may arise during scoping, not all of the issues raised warrant analysis in an environmental assessment (EA). Issues would be analyzed if: 1) an analysis of the issue is necessary to make a reasoned choice between alternatives, or 2) if the issue is associated with a significant direct, indirect, or cumulative impact, or where analysis is necessary to determine the significance of the impacts.

Analysis issues are used to focus the impacts analysis in the EA. The following analysis issues were submitted by the public in scoping comments. The BLM’s interdisciplinary team will consider these public comments as they determine which issues need to be evaluated in the impacts analysis in the EA.

4.2.1 Non-Motorized Recreation

- Establishing baseline conditions on existing conditions, location, and use of travel routes is a necessary step for making area designations through the Travel Management RMPA. This data collection process, however, should not be limited to motorized use. It is important that the WRFO create a complete picture of travel and transportation on our public lands by collecting data on non-motorized use. In doing so, the BLM can make more informed decisions through this planning process. Recreation data has proven to be useful and important in making decisions for travel elsewhere. In the Colorado River Valley RMP, for example, the field office collaborated to conduct surveys on the prevalence of recreation users. Survey results determined that hiking, mountain biking, and hunting were the most popular activities throughout the planning area. The BLM should undertake monitoring and data collection efforts for recreation throughout the WRFO during the travel management planning process. Data and analysis should be made available to public prior to the release of the draft EA, and should be used to inform travel management alternatives and decisions.
- As the BLM considers any motorized use allocations and/or motorized trail designations, it should consider how those decisions might foreclose or limit an opportunity to designate the same or a nearby trail as non-motorized. Motorized trails can have far reaching impacts throughout the region. Designating an area as open to motorized use may preclude the BLM’s ability to effectively manage an adjacent or nearby area for quiet recreation. As such, the BLM should give strong consideration to potential user-conflict generated from travel designations, in accordance with the minimization criteria.

4.2.2 Wildlife

- There is an abundance of scientific literature documenting the impacts of roads on wildlife which the BLM must use in the environmental analysis for the Travel

Management RMPA and in ultimately adopting management decisions that minimize and/or mitigate those impacts.

4.2.2.1 Big Game

- The precipitous decline of mule deer herds in the region and the presence of the greater sage-grouse warrant careful attention to wildlife impacts.
- We recommend BLM conduct three landscape fragmentation analysis methods to plan ecologically viable transportation networks. The methods include: 1) density analysis of existing and proposed transportation network features; 2) buffer analysis to examine the effect zone of the transportation network; and 3) core area analysis to identify habitat that remains unaffected by the transportation network.

4.2.2.2 Sage-Grouse

- Key sage-grouse habitats include nesting habitats, concentrated within 5.3 miles of sage-grouse leks (Holloran and Anderson 2005), early and late brood-rearing habitats, and winter concentration areas. Walker et al. (2007) recommends a buffer distance of at least 4.0 miles containing extensive stands of sagebrush habitat for breeding populations to persist. These habitats should be spatially delineated and mapped as part of the BLM's effort to address NEPA's baseline information requirements, and current existing vehicle routes should be mapped against these key habitats to determine which habitats are characterized by excessive road densities and/or improved roads sited too close to key habitats (such as leks) to prevent significant impacts.

4.2.3 Socioeconomics Analysis

- The BLM must analyze the economic benefits of protecting lands with wilderness characteristics for each alternative, and use that analysis to inform the management decisions ultimately adopted in the Travel Management RMPA.
- The BLM should consider nonmarket environmental values. IM 2013-131 directs the BLM to "utilize estimates of nonmarket environmental values in NEPA analysis supporting planning and other decision-making." Nonmarket values are described as values that "reflect the benefits individuals attribute to experiences of the environment, uses of natural resources, or the existence of particular ecological conditions that do not involve market transactions and therefore lack prices," such as "the perceived benefit of hiking in wilderness."

4.2.4 Rapid Ecoregional Assessments

- The BLM should use landscape-level data, including the Colorado Plateau Rapid Ecoregional Assessment, to inform the range of alternatives considered in the Travel Management RMPA, as well as mitigation needs and strategies.

4.2.5 Climate Change and Air Quality

- The BLM should assess the impacts of motorized use on public lands, which can exacerbate the effects of climate change by increasing greenhouse gas and fugitive dust emissions which can harm regional snowpack and air quality.
- The BLM should analyze the contribution to climate change from management decisions made in the Travel Management RMPA. This analysis should lead to the development of thoughtful management prescriptions and alternatives that will address how BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change.
- The BLM should model the impacts of travel management decisions on air quality in the planning area. The BLM must ensure that the alternatives under consideration would not violate any air quality standards, including the National Ambient Air Quality Standards (NAAQS), and must demonstrate compliance in the EA. The BLM must analyze contributions to particulate matter pollution and ozone precursors (NO_x and VOCs) from motorized use authorized in the Travel Management RMPA through emission inventories and modeling. The EA must quantify all of the surface-disturbing use that it is approving and estimate the rate at which it will generate fugitive dust as well as the generation of fugitive dust from areas disturbed by motor vehicles.

4.2.6 Cumulative Impacts

- To adequately address habitat fragmentation, the BLM must analyze the baseline conditions (the existing route network) and authorized activities (such as expected new roads authorized by the 2015 Oil and Gas Development RMPA), in addition to impacts from each alternative. The BLM must consider alternatives to minimize and mitigate impacts to habitat fragmentation, such as closing areas to motorized use, setting route density limits, and designating wildlife corridors, conservation rights-of-way or other mitigating land use allocations.

4.2.7 Human Health and Safety

- We are seeing more visitors to our forests not familiar with being in a backcountry environment making the job of search and rescue even more critical. It is much easier to find and extract people using motorized transportation. This should be considered when you look at road decommissioning. Search and Rescue can be allowed to use motorized transportation when necessary in areas where motorized travel is not usually allowed. It is important that routes remain passable in case it becomes necessary to use motorized transportation.
- As the BLM closes routes, it should evaluate the decrease in safety that is caused by concentrating more users in a smaller area. It is not without safety concerns. It would also decrease the solitude that motorized users are allowed to enjoy.

4.2.8 Soundscapes

- The BLM should acknowledge the sound resource on public lands and address the soundscape as a separate resource which must be analyzed. As part of the Travel Management RMPA, the BLM should complete sound modeling to the extent practicable to:
 - assess noise impacts of management alternatives on recreation and wildlife;
 - adopt management decisions based on sound modeling data or other information generated from soundscape analysis that minimize or mitigate noise impacts on recreation and wildlife; and
 - identify areas of the public lands where protection of the natural soundscape is prioritized.

4.2.9 Designation Criteria

- To satisfy its substantive duty to minimize impacts, the BLM must apply a transparent and common-sense methodology for meaningful application of the minimization criteria to each area being considered for designation. That methodology must include several key elements:
 - First, proper application of the minimization criteria is not solely an office exercise. As the courts have repeatedly made clear, use of cryptic spreadsheets or matrices that favor OHV use and do not facilitate implementation of the substantive duty to minimize impacts is inadequate. Rather, the BLM must get out on the ground, gather site- and resource-specific information, ground-truth desk-top analyses, and then utilize that data to actually apply the criteria to minimize resource damage and use conflicts associated with each designated area and route. This necessarily will require the agency to incorporate monitoring data and other information identifying resource or recreational use conflicts compiled by the agency or submitted by the public.
 - Second, application of the minimization criteria should be informed by the best available scientific information and associated strategies and methodologies for minimizing impacts to particular resources. In 2012, the Journal of Conservation Planning published a literature review and best management practices (BMPs) for off-road vehicles on national forest lands. The BMPs provide guidelines, based on peer-reviewed science, for off-road vehicle designation decisions, implementation actions, and monitoring activities that are intended to minimize impacts to soils, water quality, vegetation, and wildlife, and conflicts with other recreational uses. Although they were formulated for national forest lands, the BMPs are applicable to OHV designation decisions on BLM lands as well. Travel management planning processes should reference and incorporate these BMPs.
 - Third, proper application of the minimization criteria must address both site-specific and larger scale impacts. For example, the BLM must assess and minimize landscape-scale impacts such as habitat fragmentation, cumulative noise and air and water quality impacts, and degradation of wilderness characteristics and associated opportunities for primitive forms of recreation. The agency also

must assess and minimize site-specific impacts to soils, vegetation, water, and other public lands resources, sensitive wildlife habitat, and important areas for non-motorized recreation.

- Fourth, application of the minimization criteria must take into account available resources for monitoring and enforcement of the designated system. The BLM is obligated under Executive Orders 11644 and 11989 and its travel management regulations to monitor the effects of OHV use on designated areas and routes and make adjustments to the designated system as necessary. To ease enforcement obligations and ensure user compliance in the first place, OHV area designations and identification of Travel Management Areas should establish clear boundaries and simple, consistent restrictions designed to minimize resource damage and user conflicts.
- Finally, attempts to mitigate impacts associated with an existing OHV system are insufficient to fully satisfy the duty to minimize impacts, as specified in the executive orders. Application of the minimization criteria should be approached in two steps: first, the agency locates areas and routes to minimize impacts, and second, the agency establishes site-specific management actions to further reduce impacts. The best available science confirms this tiered approach. As described above, this approach is consistent with DOI's Landscape Mitigation Policy that prioritizes project design and siting to avoid adverse impacts in the first instance, followed by other minimization and mitigation measures.

4.3 Issues That Will Not Be Addressed in the RMPA

4.3.1 Outside of the Scope of the BLM's Jurisdiction

- The 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. As affirmed 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.
- Lands with wilderness character should be protected as Wilderness.

4.3.2 Outside the Scope of Travel Management

4.3.2.1 Special Recreation Management Areas

- The BLM should consider creating new area designations such as Special Recreation Management Areas (SRMAs), which can be a powerful tool in landscape level management for travel.
- Given the interdependence of travel and transportation planning and recreation planning, the BLM should include recreation designations and management guidance in the Travel Management RMPA. The BLM should designate Extensive Recreation Management Areas (ERMAs) for non-motorized recreation that overlap with other specially managed areas such as lands with wilderness characteristics. The BLM must put in place robust

management prescriptions for SRMAs and ERMAs to protect and promote the recreation opportunities they are designated for.

- The benefits of establishing and maintaining areas for use by single user groups should be considered as a means of leveraging support for other designations likely to be contentious. Special recreational areas should be oriented close to Rangely and Meeker for example, providing access for families as they orient and train on new equipment. Special recreational areas can more readily be maintained in close proximity to the town and provide for needed services for visitors and residents.

4.3.2.2 Developed Recreation Sites

- Ensure the ability to further develop the White River corridor for non-motorized boating and camping. Specifically:
 - Nicer boat launch with restrooms below the Kenney Reservoir dam;
 - Walking trail along the river in Rangely with nicer boat launches at the camper park and the green bridge;
 - River features for inner tubing between camper park and green bridge;
 - Bathrooms at green bridge;
 - River campsites and restrooms at Trujillo boat launch; and
 - Other river campsites dispersed along the river below Trujillo and to the Utah border.
- Development of drinking water sources, trail heads and access points, restrooms and camping facilities along the river corridor is integral to river access and travel, and we urge you to consider and include these items that are not traditional travel management issues in this effort.
- Allow for development of a campground in the Dragon Road area, which would be vehicle accessible and not too far from town, connected to mountain biking and hiking trails. It would be a BLM campground with vault toilets and campsites and would have fees.

4.3.2.3 Damage to Trails from Non-Recreation Projects

- The impacts from non-recreation projects often include obliteration of the trail or removal of water control structures such as rolling dips and catch basins. Those soil erosion measures can often cost \$15,000 to \$20,000/mile to install (or replace). We recommend that "trail mitigation" guidelines be added to relevant non-recreation projects.

4.3.2.4 Increased Fire Danger Due to Drought or Vegetation Management

- The BLM should look to a future of likely droughts and show how/where, with precision in siting/seasoning travel planning must account for necessary likely travel "closed areas", likely losses of total acreage open to "limited" or "open" travel use because of fire danger, necessary post-fire regrowth, erosion, movement or loss of water drainage routes, remaining potable waters to be protected.
- Special consideration should be given to utility facilities for vegetation management because of their critical role in public health and safety, and the Wildland Urban Interface and fire hazard potential. Care must be taken to protect the electrical infrastructure and

reliability as well as the protection of public and private lands from fires resulting from preventable vegetation contact with transmission lines.

4.3.3 Travel Management Plans (Implementation Plans)

4.3.3.1 Hiking Trails

- Specific non-motorized trails should be established where appropriate.
- Allow for development of hiking trails with designated parking at trail heads. Some trailheads should be close to the town of Rangely to allow residents and their dogs to get easy vigorous exercise while gossiping/socializing with friends. We have one specific location in mind for one of these trails, just immediately south of town off of Highway 139 (County Road 138).

4.3.3.2 Mountain Biking

- Leave open the possibility of a network of mountain biking trails around Rangely. The terrain affords a great opportunity for a spectacular cliff top circle around Rangely, with a network of trails in between and also centered on the town, with designated, associated parking etc. Provide a means (bridge) to cross the river either on, at or below Kenney Reservoir, to allow for a connection between the town's existing bike path to the reservoir with the BLM road on the Mesa on the north side of the reservoir that goes to the lake. This would make for a great loop bike ride - but we need a way to cross the river at the reservoir for both this and the cliff top loop around town.

4.3.3.3 Dirt Bike Trails

- A strategy should be developed to replace the lost single-track experience. Retention or enhancement of high quality single-track dirt bike trails is no different than keeping or enhancing "quiet" single-track hiking, equestrian, and mountain-bike trails.
 - Roads to Trails: Reclassify roads to primitive roads and motorized trails. Reclassify primitive road to motorized trails or manage appropriate roads as "roads managed as trails." Manage appropriate roads as "motorized trails."
 - Primitive Roads to Trails: Convert "roads-to-single track trails" or "roads-to-motorized trails less than 50 inches in width" and "roads managed as motorized trails greater than 50 inches in width" as a tool to help the agency achieve its budget objectives while still providing a substantive and high quality recreational route network.
 - Single Track Trails: The Travel Management Rule planning efforts in the Western States resulted in the loss of many, if not most, of our historic single-track motorcycle trails. Historic and legal motorized single-track opportunities such as enduro trails, old pack-mule/mining or pioneer trails were eliminated from consideration due to inadequate determination and analysis.

4.3.3.4 Vehicle Size or Type Limitations

- Consider abolishing the 50 inch rule as a road should be open or closed to all vehicles instead of creating areas for specific vehicles.
- Keep in mind that there have been many equipment changes and changes in user demographics. More people are purchasing UTVs vs. ATVs. The BLM should designate routes for motorized vehicles 50 inches wide or less to allow for travel with ATVs and the smaller UTVs. When considering road closures you should consider leaving the routes open to UTVs. The larger tire surface/weight ratio causes less impact on roads and trails than standard motorized vehicles.

4.3.3.5 Motorized Trails (Including Snowmobiles)

- Keep as many routes as possible open for full sized vehicles and for ATVs, UTVs and motorcycles. Loop routes are of very high value. Consider making them one way if width and safety are a concern.
- Consider posted snowmobile routes around town (Rangely).

4.3.3.6 Monitoring, Education, & Enforcement

- All new regulations and laws won't mean anything if they are not strictly enforced and areas monitored for negative impact.
 - The management plan must include funding to allow proper enforcement. Not just for a few years then cut from the budget as often happens.
 - Currently there is one officer to cover the entire WRFO. Hiring seasonal help or incorporating local law enforcement would be important.
 - Would drones serve as a method to patrol and enforce?
 - Consider trail cameras, surveillance cameras, remote sensing, etc. Then violators need to face federal charges with full force of federal government.
 - Create awareness among these paths via signs with a number to call for people to report damages.
 - How would the BLM enforce restrictions on over-the-snow travel?
- The BLM will need to inform the public about its travel management decisions.
 - Better signage needs to be in place and maintained.
 - The BLM will need to update maps with current and correct information for public education.
 - Kiosks will need to be placed in specific areas to inform the public of what the rules are with a map that shows what area the rules apply to.
 - Keep the WRFO website up to date with current and correct information.

- The BLM will need to clearly communicate interim management (e.g., before Travel Management Plans are completed to designate individual routes or before Supplemental Rules are published).
- New oil and gas roads that are in fact to be closed to public access must also be gated and locked. Gating and locking those roads would be necessary to ensure they aren't traveled illegally and would help facilitate restoration if and when that occurs.

4.3.3.7 New Route Construction or Upgrading Existing Routes

- Future travel management planning should acknowledge existing rights-of-way and the right to upgrade those facilities, including associated access, if and when the need arises. Rebuilding and using existing rights-of-way is preferred whenever possible to reduce new disturbance on the landscape.
- New roads should not be built if a location can be reached almost entirely from an old road.
- No new roads without offsetting closures.
- The BLM should carefully consider costs, habitat loss, disturbance levels, balance of route types to allow abundant opportunities for the widest possible range of uses and other factors before designating individual routes or creating any new routes.
- We want to build new hiking and mountain biking trails in the future and want to ensure that the implementation process does not preclude these efforts, and even encourages such development as long as it is complementary to the other stated goals.

4.3.3.8 Maintenance

- If we are going to have designated routes, then we need to come up with a plan to keep the trails/routes maintained for public use. This can be accomplished by working with user groups for certain types of maintenance.
- I am literally run off small forest roads when I hike in Pike National Forest. The forest tranquility is destroyed when the area is over-run by motorized vehicles. And who is going to pay for fixing the erosion the vehicles are causing? I don't see any effort to repair erosion areas. Don't let this happen in White River. Keep roads out of nature.

4.3.3.9 Private Property

- We request private property rights be taken in consideration, while still providing fair access to public lands.
 - Identify potential for trespass onto private land via public land.
 - Evaluate and develop alternatives in situations where trespass via public lands onto private land is a reoccurring issue for the landowner.
 - Improve identification of private land boundaries on all BLM maps.

4.3.3.10 Public Health and Safety

- How can you address, during this process, travel safety through grazing lease areas on public lands that allow open range, such as along the Highway 139 corridor?

5 ANTICIPATED DECISIONS TO BE MADE

5.1 Guidance to Be Provided in the Travel Management RMPA

1. The BLM would define the long term management goals for the transportation system.
2. All public lands within the planning area would be designated as open, limited, or closed to off-road vehicle use, mechanized use, and/or non-motorized use.
3. The BLM would determine if there are any areas where non-motorized access (including mechanized and non-mechanized use) should be limited to designated routes or be subject to some other limitation on use.
4. In addition to the designation criteria identified in 43 CFR 8342.1, additional criteria would be developed to:
 - a. select or reject specific roads, primitive roads, and trails in the final travel management network;
 - b. add or construct new roads, primitive roads, or trails to the travel management network; and
 - c. specify limitations.
5. The BLM would determine under what circumstances exceptions could be granted for specific roads, primitive roads, or trails within closed or limited areas.
6. The BLM would provide guidance on emergency closures and temporary closures needed to protect public health and safety or to prevent undue and unnecessary resource degradation due to unforeseen circumstances.
7. The BLM would define interim management objectives and identify the process of moving from an interim designation of “limited to existing roads, primitive roads, and trails” to a designation of “limited to designated roads primitive roads and trails” upon completion of TMPs.
8. The BLM would identify any easements or rights-of-way needed to maintain the existing road and trail network.
9. The BLM would outline the overall strategy for completing Travel Management Plans (including additional data needs and a general schedule).
10. A process would be identified to evaluate “existing routes” not included in the inventory (and thus not considered in this plan).

5.2 Guidance to Be Provided During Subsequent Implementation Planning

1. The BLM would identify, evaluate, and select specific routes available for motorized and non-motorized uses within the areas designated as “limited”. Route specific objectives would be identified and the BLM would specify limitations or restrictions on type, duration, season of uses, or modes of transportation allowed.
2. Once a system of designated roads, primitive roads, and trails has been identified, a map would be produced to communicate to travel network users which routes are available for motorized use and any conditions on that use. The map should also identify non-motorized trail opportunities and associated access points such as trailheads and parking areas.
3. To communicate the travel management plan to travel network users, the BLM would develop a sign plan, an education plan, and a monitoring plan.
4. In coordination with BLM law enforcement staff, and to the extent practicable, with state and local law enforcement agencies, the BLM would develop an enforcement plan.
5. The BLM would issue needed easements and rights-of-way (ROWs) to the BLM or others, to maintain the existing road, primitive road, and trail network providing public land access.
6. The BLM would also establish maintenance intensities for all roads, primitive roads, and trails.
7. Any transportation linear features that are not identified as part of the designated travel network would be included in a rehabilitation plan for decommissioning and rehabilitating closed or unauthorized routes.
8. Adaptive management language would be included to address how routes may be modified within the transportation network in the future.

6 VALID EXISTING MANAGEMENT

The Travel Management RMPA will establish new land use planning decisions to address issues identified through scoping and, where appropriate, may incorporate decisions from the 1997 White River RMP and subsequent amendments. Determining which existing management decisions to carry forward is part of the planning process. The BLM will review the existing management situation to determine which decisions to carry forward and will identify where new management guidance should be developed.

7 DATA SUMMARY/DATA GAPS

The BLM has inventoried available information and identified the following data needs:

- Completion of the route inventory for the northwest corner of the field office; and
- Cultural resource inventories.

The BLM plans to complete the route inventory for the northwest corner of the field office during the summer of 2016. The BLM is also working with the Colorado State Historic Preservation Officer to develop a Programmatic Agreement that outlines the requirements for cultural resource inventories. The BLM may identify additional data needs as the planning process progresses.

8 FUTURE STEPS IN THE PLANNING PROCESS

The planning process for the Travel Management RMPA includes the following future steps:

1. Formulate preliminary alternatives.
2. Public review of preliminary alternatives.
3. Analyze impacts of the alternatives and prepare a Draft RMPA/EA.
4. Provide for public review and comment on the Draft RMPA/EA.
5. Respond to comments and prepare the Proposed RMPA/Final EA.
6. Provide for a 30-day protest period for the Proposed RMPA.
7. Provide for a 60-day Governor's Consistency Review of the Proposed RMPA.
8. Prepare a Decision Record and Approved RMPA.

Public Comment

The BLM will provide the public an opportunity to review the preliminary alternatives prior to conducting the impacts analysis. The public will also have a minimum of 30-days to review and provide comment on the Draft RMPA/EA and unsigned Finding of No Significant Impact (FONSI).

Mailing List

To request further information, have names added to or removed from the mailing list, or update contact information, members of the public may email a request to BLM_CO_WRFO_TMP@blm.gov, or contact: Heather Sauls, Planning & Environmental Coordinator, BLM WRFO, 220 East Market St, Meeker, CO 81641; telephone (970) 878-3855.

9 SUPPORTING INFORMATION

9.1 Glossary

Access: The opportunity to approach, enter, or make use of public lands.

Accessible: A term used to describe a site, building, facility, or trail that complies with the Architectural Barrier Act Accessibility Standards (ABAAS) and can be approached, entered, and used by people with disabilities.

Animal-powered/Assisted Travel: Travel using horses, livestock, dogs, or other animals to travel to and across BLM-managed public lands.

Four-Wheel Drive Vehicle (4x4, 4WD): A passenger vehicle or light truck having power available to all wheels generally capable of off-highway travel.

Game Retrieval: Generally refers to retrieval of a downed big game animal by an individual who has legally taken that animal. (Note: Colorado Parks and Wildlife does not have a definition of game retrieval in their regulations nor does Title 33 of the Colorado Statutes.)

Game retrieval cart: A wheeled device for the purpose of retrieving a large game animal with a valid carcass tag. The cart is pushed or pulled by human power (for example, wheelbarrow). A game retrieval cart may not be powered by mechanized devices such as gears (for example, bicycle), or any gas or electric motor.

Implementation Plan: A site-specific plan written to implement decisions made in a LUP. An implementation plan usually selects and applies best management practices to meet land use plan objectives. Implementation plans are synonymous with “activity” plans. Examples of implementation plans include interdisciplinary management plans, travel management plans, habitat management plans, recreation area management plans, and allotment management plans.

Mechanized Use/Travel: Moving by means of mechanical devices such as a bicycle; not powered or assisted by a motor (including electric motors of any size).

Mode: A particular form of travel, such as walking, bicycling, motor vehicle, horse, etc.

Motorized Travel: Moving by means of vehicles that are propelled by motors such as cars, trucks, OHVs, motorcycles, boats and aircraft.

Motorized Vehicle: Synonymous with off-highway vehicle (OHV). Examples of this type of vehicle include all-terrain vehicles (ATV), Utility Type Vehicle (UTV), Sport Utility Vehicle (SUV), motorcycle, and snowmobiles.

All-Terrain Vehicle (ATV): A wheeled vehicle other than a snowmobile, which are defined as having a wheelbase and chassis of fifty (50) inches in width or less, steered with handlebars, generally having a dry weight of 800 pounds or less, travels on three or more low-pressure tires, and with a seat designed to be straddled by the operator.

Motorcycle: Motorized vehicles with two tires and with a seat designed to be straddled by the operator.

Off-Highway Vehicle (OHV): OHV is synonymous with Off-Road Vehicles (ORV). ORV is defined in 43 CFR 8340.0-5 (a): Off-road vehicle means 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 in times of national defense emergencies. OHVs generally include dirt

motorcycles, dune buggies, jeeps, 4-wheel drive vehicles, SUVs, over-the-snow vehicles, UTVs and ATVs.

Over-the-Snow Vehicle: An over-snow vehicle is defined as a motor vehicle that is designed for use over snow that runs on a track or tracks and/or a ski or skis, while in use over snow. An over-snow vehicle does not include machinery used strictly for the grooming of non-motorized trails.

Sport Utility Vehicle (SUV): A street legal, high clearance vehicle used primarily on-highway but designed to be capable of off-highway travel.

Utility Type (or Terrain) Vehicle (UTV): Any recreational motor vehicle other than an ATV, motorbike or snowmobile designed for and capable of travel over designated unpaved roads, traveling on four (4) or more low-pressure tires, maximum width less than seventy-four (74) inches, usually a maximum weight less than two thousand (2,000) pounds, or having a wheelbase of ninety-four (94) inches or less. Utility type vehicle does not include vehicles specially designed to carry a person with disabilities.

Non-motorized Travel: Moving by foot, stock or pack animal (or other animal-powered travel), boat, or mechanized vehicle such as a bicycle.

Official Use: Use by an employee, agent, or designated representative of the Federal Government or one of its contractors, in the course of his employment, agency, or representation.

OHV Area Designations: Used by Federal agencies in the management of OHVs on public lands. Refers to land use plan decisions (allocations) that permit, establish conditions, or prohibit OHV activities on specific areas of public lands. All public lands are required to have OHV designations (43 CFR 8342.1). The CFR requires all BLM-managed public lands to be designated as open, limited, or closed to off-road vehicles and provides guidelines for designation. The definitions of open, limited, and closed are provided in 43 CFR 8340.0-5 (f), (g), and (h), respectively.

Open: Motorized vehicle travel is permitted year-long anywhere within an area designated as “open” to OHV use. Open designations are used for intensive OHV use areas where there are no special restrictions or where there are no compelling resource protection needs, user conflicts, or public safety issues to warrant limiting cross-country travel (*see* 43 CFR 8340.05).

Limited: Motorized vehicle travel within specified areas and/or on designated routes, roads, vehicle ways, or trails is subject to restrictions. The limited designation is used where OHV use must be restricted to meet specific resource management objectives. Examples of limitations include: number or type of vehicles; time or season of use; permitted or licensed use only; use limited to designated roads and trails; or other limitations if restrictions are necessary to meet resource management objectives, including certain competitive or intensive use areas that have special limitations (*see* 43 CFR 8340.05).

Closed: Motorized vehicle travel is prohibited in the area. Access by means other than motorized vehicle is permitted. Areas are designated closed if closure to all vehicular use

is necessary to protect resources, promote visitor safety, or reduce use conflicts (*see* 43 CFR 8340.05).

Preliminary Network: If a final road and trails network is not identified in the RMP process, the plan should include a preliminary network that will be identified for use until a final network is selected through a subsequent implementation plan.

Primitive Road: A linear route managed for use by four-wheel drive or high-clearance vehicles. These routes do not customarily meet any BLM road design standards.

Primitive Route: Any transportation linear feature located within a WSA or lands with wilderness characteristics designated for protection by a land use plan and not meeting the wilderness inventory road definition.

Road: A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use.

Routes: Multiple roads, trails, and primitive roads; a group or set of roads, trails, and primitive roads that represents less than 100 percent of the BLM transportation system. Generically, components of the transportation system are described as “routes.”

RS 2477: Revised Statute 2477; Section 8 of the Mining Act of 1866 provided: “and be it further enacted, that the right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted.” The statute was self-enacting; rights being established by “construction” of a “highway” on unreserved public lands, without any form of acknowledgement or action by the Federal government. This section of the statute was later re-codified as Revised Statute 2477. R.S. 2477 was repealed by FLPMA on October 21, 1976, with a savings provision for rights established prior.

Supplemental Rules: See 43 CFR 8365.1-6

Temporary Route: Temporary routes are defined as short-term overland roads, primitive roads or trails; authorized or acquired for the development, construction or staging of a project or event that has a finite lifespan.

Trail: Linear routes managed for human-powered, stock, or off-road vehicle forms of transportation, or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.

Transportation Linear Disturbances: Linear disturbances identify human-made linear features that are not part of the BLM’s transportation system. Linear disturbances may include engineered (planned) as well as unplanned single- and two-track linear features that are not part of the BLM’s transportation system.

Transportation Linear Features: Linear features represent the broadest category of physical disturbance (planned and unplanned) on the BLM land. Transportation-related linear features include engineered roads and trails, as well as user-defined, non-engineered roads and trails created as a result of the public use of the BLM land. Linear features may include roads,

primitive roads, and trails identified for closure or removal as well as those that make up the BLM's defined transportation system.

Transportation Network: The network of roads, primitive roads, and trails (motorized and non-motorized) that are selected (recognized, designated, or authorized) for use through the comprehensive travel and transportation planning process.

Transportation System: The roads, primitive roads, and trails designated as facility assets and maintained by the BLM.

Travel Management Area (TMA): TMAs are polygons or delineated areas where travel management (either motorized or non-motorized) requires particular focus. These areas may be designated as open, closed, or limited to motorized use and will typically have an identified or designated network of roads, trails, ways, and other routes that provide for public access and travel across the planning area. All designated travel routes within TMAs should have a clearly identified need and purpose, as well as clearly defined activity types, modes of travel, and seasons or times for allowable access or other limitations.

Travel Management Plan (TMP): The document that describes the process and decisions related to the selection and management of the Transportation Network. This plan can be integrated in an RMP or as a stand-alone implementation plan after development of the RMP.

Travel and Transportation Management (TTM): The on-the-ground management and administration of travel and transportation networks (both motorized and non-motorized) to ensure that public and administrative access are met, resources are protected, and regulatory needs are considered. It consists of implementation, education, enforcement, monitoring, easement acquisition, mapping and signing, and other measures necessary for providing access to public lands for a wide variety of uses (including uses for administrative, recreational, traditional, authorized, commercial, educational, and other purposes) as well as all forms of motorized and non-motorized access or use, such as foot, equestrian, mountain bike, off-highway vehicle, and other forms of transportation.

9.2 Acronyms

ATV	All-terrain vehicle
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DR	Decision Record
EA	Environmental Assessment
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act of 1976
FRN	Federal Register Notice
FS	U.S. Forest Service
FWS	U.S. Fish and Wildlife Service
GIS	Geographic Information System
IDT	Interdisciplinary Team
LUP	Land Use Plan
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
OHV	Off-highway vehicle
ORV	Off-road vehicle
PHMA	Priority Habitat Management Area (for Greater Sage-Grouse)
RMP	Resource Management Plan
RMPA	Resource Management Plan Amendment
ROW	Right-of-way
TMA	Travel Management Area
TMP	Travel Management Plan (Route-by-route implementation plan)
TTM	Travel and Transportation Management
WSA	Wilderness Study Area

APPENDIX A. MAP

Figure 1. White River Field Office Planning Area

