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**APPENDIX V**  
**DRAFT ENVIRONMENTAL IMPACT STATEMENT:**  
**PUBLIC COMMENTS AND BLM RESPONSES**

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# APPENDIX V

## PART 1: RESPONSE TO COMMENTS

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This appendix contains public comments on the *Draft Resource Management Plan/Draft Environmental Impact Statement for the Colorado River Valley Field Office*, along with responses to those comments. All identified comments were distributed by comment category to the appropriate resource specialists in the Colorado River Valley Field Office (CRVFO) or the Bureau of Land Management (BLM) Colorado State Office for review. Over 5,000 distinct comments were coded according to comment categories. The categories included each resource, resource use, and special designation discussed in the Draft RMP/Draft EIS, as well as National Environmental Policy Act (NEPA) and RMP procedural issues.

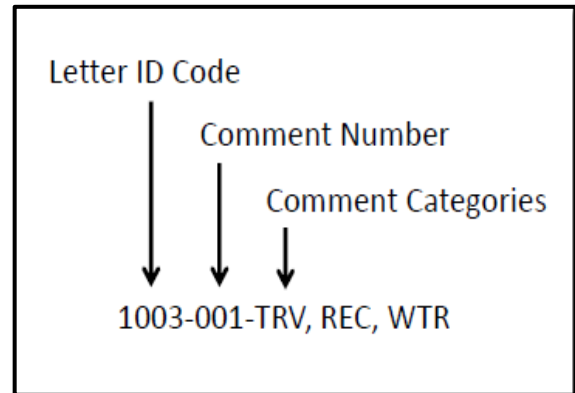
The BLM considered every comment, whether it came repeatedly from many people with the same message(s) or from a single person raising a technical or personal point. In analyzing comments, the BLM emphasized the content of the comment rather than the number of times a comment was received. While each person's viewpoint was diligently considered, the comment analysis involved determining whether a comment was substantive or non-substantive in nature. According to NEPA, the BLM is required to identify and formally respond to all substantive public comments. On the basis of the Council on Environmental Quality's (CEQ) regulations, a substantive comment does one or more of the following:

- Questions, with a reasonable basis, the accuracy of the information and/or analysis in the EIS.
- Questions, with a reasonable basis, the adequacy of the information and/or analysis in the EIS.
- Presents reasonable alternatives other than those presented in the Draft EIS that meet the purpose and need of the proposed action and addresses significant issues.
- Questions, with a reasonable basis, the merits of an alternative or alternatives.
- Causes changes in or revisions to the proposed action.
- Questions, with a reasonable basis, the adequacy of the planning process itself.

Non-substantive comments simply state a position in favor of, or against, an alternative or a management action proposed in an alternative; merely agree or disagree with BLM policy; provide information not directly related to issues or impact analyses, or otherwise express an unsupported personal preference or opinion.

The BLM has reviewed and considered all non-substantive comments, but has not provided formal responses to such comments. Although non-substantive comments, including personal preferences and opinions, may be may be considered by the decisionmaker as he or she chooses the agency's Proposed RMP, they generally will not affect the analysis.

A single comment that addressed multiple issues was coded for several specialists to review. For example, a comment that related to trail access issues (TRV), recreation (REC), and water resources (WTR), was coded for review by a trails and travel management specialist, an outdoor recreation planner, and a hydrologist. Sometimes it was necessary to do an interdisciplinary comment review and response involving all the specialists. Since many distinct comments were coded to multiple comment categories, the total comment response workload was actually much greater than the number of individual comments.



During the review of the comments, it was noted that many of the substantive comments concerned identical or very similar issues. In these cases, a collective response was developed for a similar group of comments. These responses are presented in Part 1 of this appendix. Table V-1 presents the number of distinct comments for each of the categories and the section number where the summarized responses may be found. Part 2 of this appendix presents a listing of commenters on the Draft RMP/Draft EIS and their comment categorization.

Several nongovernmental organizations or groups submitted comments in the form of standardized campaign letters from their constituents. Ten campaigns were submitted on the Draft RMP/Draft EIS, with more than 26,000 constituents represented. These organizations or groups held campaigns regarding the alternatives evaluated and the issues discussed in the Draft RMP/Draft EIS through which their constituents and other members of the public were able to submit standardized letters. Some campaign letters were submitted as a single form letter, with multiple signatures attached to indicate support for the campaign. For other campaigns, individuals modified a standard letter provided by the organization. Part 3 of this appendix presents the campaign letters.

The description of the public comment process is detailed in Section 1.9.

**Table V-1**  
**Number of Comments per Category**

<b>Section Number</b>	<b>Comment Category</b>	<b>Number of Comments</b>	<b>Percentage of Total</b>	<b>Comment Category Code</b>
1	Air Quality	413	3.3%	AIR
2	Climate Change	18	0.1%	CLC
3	Soils	44	0.4%	SOI
4	Water Resources	398	3.2%	WTR
5	Vegetation	154	1.2%	VEG
6	Fish and Wildlife	659	5.3%	FWL
7	Special Status Species	200	1.6%	SSS
8	Cultural Resources	20	0.2%	CUL
9	Paleontological Resources	4	0.0%	PAL
10	Visual Resources	60	0.5%	VIS
11	Wildland Fire Management	10	0.1%	WFM
12	Lands Proposed for the Protection of Wilderness Characteristics	120	1.0%	LWC
13	Cave and Karst Resources	17	0.1%	CAV
14	Forestry	13	0.1%	FOR
15	Livestock Grazing	99	0.8%	GRZ
16	Recreation and Visitor Services	1622	13.0%	REC
17	Comprehensive Trails and Travel Management	921	7.4%	TRV
18	Lands and Realty	129	1.0%	RLT
19	Minerals	526	4.2%	MIN
19	Oil and Gas Leasing	1435	11.5%	OIL
20	Renewable Energy	64	0.5%	RNW
21	Areas of Critical Environmental Concern	156	1.3%	ACC
22	Wilderness and Wilderness Study Areas	96	0.8%	WSA
23	Wild and Scenic Rivers	102	0.8%	WSR
24	National Trails and Scenic Byways	1	0.0%	NTS
25	Transportation Facilities	505	4.0%	TRN
26	Public Health and Safety	272	2.2%	PHS
27	Social and Economic Concerns	882	7.1%	SOC
28	Alternatives	1469	11.8%	ALT
29	RMP/NEPA Process	1252	10.0%	PRC
30	Consultation and Coordination	363	2.9%	CON
31A	Cumulative Impacts	72	0.6%	CUM
31B	Scope of EIS	376	3.0%	SOC
31C	Environmental Justice	0	0.0%	ENJ

Acronyms and Abbreviations:

EIS	environmental impact statement
NEPA	National Environmental Policy Act of 1969, as amended
RMP	resource management plan

## RESPONSE TO COMMENTS

Part 2 – Table V-2 lists the agencies that provided comments on the Draft RMP/Draft EIS. Table V-3 lists all other commenters including members of organizations, as well as organizations themselves. Each letter was coded with: a “Letter ID Code,” a “Comment Number,” and the “Comment Categories” the comment discussed. A commenter can locate his/her letter by name and then see the assigned coding.

If a comment discussed travel management, recreation and water resources, it would have Comment Categories “TRV, REC, WTR” coded to it. A commenter then can read the corresponding “Summarized Comment Responses by Category” below to see how the comments for each category were summarized and addressed. For example, a summary of responses for travel management (TRV) comments can be found in Section 17.0; a summary of responses for recreation and visitor services (REC) can be found in Section 16.0; and a summary of responses for water resources (WTR) can be found in Section 4.0.

### SUMMARIZED COMMENT RESPONSES BY CATEGORY

#### 1.0 AIR QUALITY

There were approximately 400 comments concerning air quality.

#### 1.1 THE AIR QUALITY ANALYSES AND TECHNICAL DOCUMENTS

**Comment Summary:** The air quality analyses presented in the Draft RMP/Draft EIS and the accompanying air technical documents are deficient.

**Response:** The air quality analysis conducted for the Draft RMP/Draft EIS and reported in the Air Quality Analyses and Technical Document (ARTSD) was based on EPA modeling guidance, and used generally accepted practices for air quality modeling analysis and the current ambient air quality data available at the time of the modeling effort.

The analysis protocol was reviewed by an air quality stakeholder group including cooperating agencies, the BLM, and EPA. The general consensus reached by this group is reflected in the protocol and the methodologies presented in the ARTSD and Section 4.2 of the Draft RMP/Draft EIS. Based on the analysis, no potentially significant adverse impacts were identified from direct project sources under any of the alternatives. Thus, the proposed project is projected to comply with applicable federal and state air quality laws and standards.

#### 1.2 COMPLIANCE WITH FEDERAL AND STATE AIR QUALITY STANDARDS.

**Comment Summary:** The alternatives fall short of establishing mitigation and monitoring measures that will help ensure compliance with federal and state air quality standards.

**Response:** An adaptive management plan has been added to the Proposed RMP/Final EIS to establish criteria and commitments for ensuring compliance with air quality regulations and annual review of air resource impacts associated with BLM activities. The BLM has identified air monitoring as a critical part of implementing an air quality management strategy, and the goal of cooperating with multiple agencies in identifying monitoring needs, implementing monitoring plans, and operating monitoring equipment has been included in the Proposed RMP/Final EIS.

In addition, certain situations for specific projects on BLM lands in proximity to sensitive receptors may require site-specific air quality monitoring. Individual air quality monitoring locations are developed when

site-specific implementation-level decisions are made at the time of permitting. These site-specific requirements are outside the scope of the RMP planning process.

### **1.3 REGULATORY AUTHORITY OF THE BLM**

**Comment Summary:** Commenters question BLM’s regulatory authority to require specific air quality mitigation measures for oil and gas development.

**Response:** The BLM manages public lands in the best interest of the public in accordance with its organic act, the Federal Land Policy and Management Act (FLPMA). In addition to providing direction on developing resources for the public, the act contains direction on the protection of resources. Section 102(8) of the act states in part that “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values.” Section 302(b) of the act states “in managing the public lands the Secretary shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands.”

Under NEPA, the BLM is required “to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment...” and to “use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment...” (40 CFR 1500.2) NEPA also requires analysis of potential mitigation measures and implementation and monitoring of selected mitigation measures. In addition, the BLM must ensure that projects on public lands meet or comply with all local, state, federal, and tribal plans, standards, and regulations.

By constructing air analyses to determine air impacts from specific federal actions and then developing emission control strategies and mitigation measures to address those impacts, the BLM is not writing new regulations nor is it establishing itself as a regulatory agency. Rather, the BLM is responding to estimated impacts from a specific action and complying with direction under NEPA, FLPMA, and the Clean Air Act (CAA).

During the scoping process for the Draft RMP/Draft EIS, a range of oil and gas development scenarios (number of wells, surface disturbance, and related factors) and currently available air mitigation technologies were chosen as assumptions for the air quality model (ARTSD). Some of the measures were derived specifically from requirements for technologies currently applied or planned to be applied in the future by EPA and the Colorado Department of Public Health and Environment (CDPHE). In fact, EPA’s response to the Draft RMP/Draft EIS supports the air quality mitigation measures in the preferred alternative, and recommends including the measures in the Record of Decision (ROD) and requiring the controls when applications for permit to drill (APDs) are approved.

The levels of emissions from the range of number of wells, area of disturbed land, and air quality mitigations formed the basis for the inputs to the air quality model. Among the assumptions were a range of mitigation measures that could be applied to reduce various emissions, including particulates, hazardous air pollutants, major industrial “criteria” pollutants, greenhouse gases, and precursors of ozone and photochemical smog. The mitigation measures presented under the Air Resources section of Table 2-2 include the assumed control measures to be applied by the BLM under each alternative. The air quality impacts of the range of inputs were analyzed with the modeling effort and reported in the ARTSD. The assumptions from the model then formed the basis for air quality mitigations and associated environmental impacts in the range of alternatives

in the Draft RMP/Draft EIS. The project level and cumulative air quality results of the model were then compared with federal and state air quality regulations.

Air quality regulations promulgated by EPA and CDPHE, as well as regulations, plans, and policies established by other agencies such as Colorado Oil and Gas Conservation Commission (COGCC), US Department of Agriculture, Forest Service, and local counties, serve as the threshold values to evaluate the impacts of the alternatives and guide the BLM's decision process for the proposed project. The results of the model and subsequent analysis indicated no significant impacts from the project to air quality when the emission control measures included in the modeling assumptions are implemented. However, BLM does recognize that cumulative air quality impacts of all activities in the area are predicted to occur in the future. These impacts highlight the need to incorporate a level of mitigations that provide a balance between preservation and use.

#### **1.4 CONVERSION OF ENGINES**

**Comment Summary:** BLM received many comments on the drill rig emission controls specified as air quality management actions. Many comments questioned the need for use of specific rig engine technology to address air quality concerns.

**Response:** BLM recognizes that EPA, CDPHE, and COGCC have established regulations and emissions standards that apply to many of the oil and gas sources evaluated in the air analysis for the Draft RMP/Draft EIS. It is not BLM's intent to supersede these agencies' authority or to create redundant or inconsistent additional requirements.

However, BLM differs from these agencies in that it is required to address impacts from multiple emission-generating sources and activities that comprise BLM oil and gas development projects, some of which may not be regulated by these agencies, as well as to evaluate impacts from the project as a whole. In its planning efforts, BLM evaluates impacts from its authorizations within an entire region. In addition, BLM is required to evaluate the cumulative effect of its actions. While most air quality regulations focus on controlling emissions from a single stationary point source or source category, BLM must evaluate and in some cases develop emission control strategies to mitigate impacts from a broader scope of emission sources and activities. For a specific analysis, this effort may involve developing strategies that include reducing emissions from unregulated sources, expanding the applicability of existing emission control regulations, or incorporating emission control strategies that have been demonstrated to be technically feasible. By constructing air analyses to evaluate air impacts from specific federal actions and then developing emission control strategies and mitigation measures to address those impacts, BLM is not writing new regulations, nor is it establishing itself as a regulatory agency. Rather, BLM is responding to predicted impacts from a specific action and complying with direction under NEPA, FLPMA, and CAA.

For this RMP, BLM evaluated impacts of air pollutant emissions from a level of oil and gas development equivalent to up to 4,198 producing "BLM" wells and up to 15,664 total wells within the planning area with a cumulative total of more than 44,000 wells within the region over the next 20 years. At this level of potential development and associated estimated emissions, BLM had to consider not only air quality regulations promulgated by EPA and CDPHE, but a range of additional emission control strategies, including improved engine technology. During the scoping process for the Draft RMP/Draft EIS, a range of oil and gas development scenarios (number of wells, surface disturbance, and related factors) and currently available air mitigation technologies were chosen as assumptions for the air quality model (ARTSD). The measures were derived specifically from requirements for technologies currently applied or planned to be applied in the



future by the EPA and the CDPHE. In fact, EPA's response to the Draft RMP/Draft EIS supports the air quality mitigation measures, including mitigations for drill rig engines, in the preferred alternative, recommends including the measures in the ROD, and recommends requiring the controls when approving APDs.

In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments and issues regarding availability and economic and technical feasibility of air mitigation measures. BLM has balanced these comments with the results of the air quality model. Results of the air quality model will be used in an adaptive management approach to guide implementation of air quality mitigation measures. Specifically, BLM will initially require all drilling and completion engines used on BLM lands or used to access federal minerals to meet or exceed Tier 2 non-road diesel engine emission standards (40 CFR Part 89) within 1 year after the ROD is issued. Subsequently, based on an annual review specified in the AQMP, the actual rate of well development, and improvements in emission reductions undertaken voluntarily by operators, the BLM will establish requirements for phasing in the use of improved drilling and completion engines that meet or exceed Tier IV non-road diesel emission standards (40 CFR 1039). The conversion to engines that meet or exceed Tier IV non-road diesel emission standards will be completed when 2,664 wells, or the equivalent emissions modeled in Alternative A of the ARTSD, have been reached. Other emissions reducing approaches, such as electric compressors, may be considered in future projects as those technologies become available and economically and technically feasible.

### **1.5 ELECTRIC COMPRESSORS**

**Comment Summary:** Comments by industry and the public advised the BLM that powering compressors with electricity is not feasible.

**Response:** A range of currently available technologies which reduce air emissions were chosen to be evaluated with the air quality modeling effort presented in the ARTSD and results incorporated in the Draft RMP/Draft EIS. In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments and issues regarding technical feasibility of air mitigation measures. The Proposed RMP/Final EIS does not require any measures which are technically infeasible or unavailable. The BLM recognizes that the electric transmission lines in the project area do not carry enough voltage to power large compressor stations and running transmission lines to well pads is infeasible at this time. However, electric compression may be evaluated as a potential control strategy when conducting analyses for future proposed projects.

### **1.6 BROADEN AIR ANALYSIS**

**Comment Summary:** Commenters requested that the BLM broaden the air quality analysis to a larger range of oil and gas development and more quantitative analysis of other authorized activities.

**Response:** The purpose of the air modeling conducted for this Draft RMP/Draft EIS was to identify potential increases in concentrations of criteria air pollutants attributable to emission generating activities that are authorized by the BLM. Air modeling results were then used to inform decisions to be made by BLM within the scope of the RMP/EIS. The scope of the air modeling was not intended to provide a comprehensive analysis of impacts to air quality from potential emissions of all air pollutants at all potential air emission sources. An extensive analysis of the current and future state of air quality conditions falls under the purview of the regulatory agency with delegated authority to control air emissions (CDPHE).

Oil and gas development was identified as the activity authorized by BLM within this planning area that had the highest potential to result in increased air emissions under all alternatives and potentially result in impacts to air quality. Therefore, BLM included in the modeling not only the actions that it authorizes (drilling and other surface-disturbing activities) but other connected actions (emission generating activities) associated with oil and gas development as well, such as gas treatment and storage, compression, and traffic.

Other activities authorized by BLM within this planning area were identified as having the potential to generate air emissions, such as off-highway vehicle (OHV) use and grazing. Emissions from these activities were not quantified because of the transient and varying nature and short-term duration of these types of activities, because emissions data are not reliable, and because impacts from these activities could not be well simulated in the model. In addition, the potential magnitude of emissions generated by these types of activities was considered to be so much less than the magnitude of emissions from oil and gas activities that increases in modeled impacts would be virtually undetectable. Therefore, impacts to air quality from these activities could not reasonably or reliably be quantified.

The cumulative air modeling included increases in emissions from more than 120 sources within the modeling domain, including coal mines, gas plants, utility stations, and other industrial facilities. Emissions from these facilities and the resulting modeled impacts were included in the cumulative analysis.

In response to comments that the BLM's air analysis did not take into account development between 2006 and when the RMP will be implemented, the following is provided. The air analysis considered a range of development scenarios over the 20-year planning period for all four alternatives. It was determined that the maximum emissions would occur in year 20 for all alternatives. The 20-year horizon is a typical timeframe for RMPs and was the interval used in the reasonable foreseeable development (RFD) that was used to derive the development scenarios. This maximum-emissions year was labeled 2028 in the ARTSD but could be any calendar year when the corresponding level of development occurs. For example, the maximum level of development assumed and analyzed for Alternative D was for 10 drill rigs operating, 513 wells drilled, 15,664 wells producing, nine compressor stations, and a gas production rate of 1,556 million standard cubic feet per day. It is this assumed level of development that produces the magnitude of emissions leading to the impacts that were analyzed. This level was assumed to occur in year 2028 based on the 20-year planning horizon. The pertinent point is that it is the estimated increase in emissions based on the assumed maximum-emissions year that result in impacts, regardless of the actual year or the actual number of wells where those emissions occur. The air analysis considered and analyzed a range of increases in emissions. These increases could actually come from any increase in development (including between 2006 and signing of the ROD) up to the maximum emission rate analyzed. For example, under Alternative D, an increase in nitrogen oxides (NO<sub>x</sub>) emissions of 2,037 tons per year was analyzed. The 15,664 wells as of year 2028 associated with this increase in NO<sub>x</sub> emissions are based on assumptions about emission rates associated with future oil and gas development and a range of future development scenarios. These assumptions are not meant to forecast exact future development timing and intensity.

## **1.7 EMISSION CONTROLS**

**Comment Summary:** BLM received many comments on the feasibility and need for emission controls specified in the air quality management actions

**Response:** The emission control measures that become part of the management actions in the selected alternative will be included in the ROD for this RMP. Implementation of those measures will be through Conditions of Approvals on APDs, authorizations for Master Development Plans or proponent proposals,

and through leasing stipulations. The public will have additional opportunity to comment on the emissions control measures through the NEPA process for each of these actions.

For this Draft RMP/Draft EIS, BLM evaluated impacts of air pollutant emissions from a level of oil and gas development equivalent to up to an assumed 4,198 producing “BLM” wells and up to 15,664 total wells within the planning area and a cumulative total of more than 44,000 wells within the region over the next twenty years. At this level of potential development and associated estimated emissions, BLM had to consider not only air quality regulations promulgated by EPA and CDPHE, but additional emission control strategies such as consolidation of gas treatment facilities, liquids gathering systems, maximum fugitive dust control, and improved engine technology.

BLM also considered the capture and control of volatile organic compound (VOC) emissions from all glycol dehydrators at a control/destruction efficiency of 90 percent. BLM is aware that both CDPHE and COGCC have established VOC emission control requirements for dehydrators. In addition, EPA recently revised its regulations to include hazardous air pollutant control requirements for glycol dehydrators located at major sources. All of these regulations have thresholds for applicability. BLM considered in its analysis that with the applicability thresholds in existing regulations (consolidation of gas processing facilities, the aggregation of VOC sources, and distance to occupied facilities) that almost all dehydrators would become subject to the requirements of these regulations. BLM’s air analysis showed that this level of control on all dehydrators combined with other measures to reduce VOC emissions would allow for maximum proposed development within the planning area.

BLM also considered the consolidation of liquids gathering and gas treatment facilities. These control strategies reduce emissions of several air pollutants from several activities. The main benefit of consolidated facilities is the reduction in emissions of fugitive dust and vehicle exhaust from decreased haul truck and crew trips to each well pad for fluids pick up or delivery and maintenance. Reduced vehicle traffic results in reduced NO<sub>x</sub>, VOC, carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), hazardous air pollutants, and greenhouse gas emissions from the combustion of fuel, primarily diesel. In addition, liquids gathering systems result in fewer fugitive emissions because of the reduced loading and offloading events and because tanks are efficiently sized and emissions more effectively captured and controlled. Consolidation of gas treatment and processing operations typically results in reduced emissions of NO<sub>x</sub> and VOC and reduced ozone formation as dehydrators, separators, amine units, and the associated heaters can be sized more efficiently and emissions from the multiple vents and stacks can be captured and controlled more effectively. The same benefits are realized for hazardous air pollutants and greenhouse gases. BLM is aware that these strategies can result in increased short-term impacts to air quality and other resources from the construction of necessary infrastructure. The purpose of the management action is to provide BLM with direction on how to achieve its air quality goals and objectives. Operators will be required to submit plans of development that coincide with BLM’s stated actions, objectives, and goals of reducing emissions by consolidating facilities or installing liquids gathering systems. Project proposals and potential impacts will be analyzed in the context of meeting the goals and objectives.

## **1.8 CUMULATIVE AIR EMISSIONS**

**Comment Summary:** Commenters questioned whether a cumulative air emission analysis was conducted.

**Response:** The following statement from page 4-29 of the Draft RMP/Draft EIS...*“However, cumulative impacts (described below) differ between Alternative B and Alternative C due to changes in cumulative emissions within the White River FO (WRFO)...”* refers to the emissions assumptions used to calculate cumulative emissions under

each alternative. RFD emissions for three additional BLM Field Offices (White River, Vernal, and Little Snake) were estimated and included in the cumulative air analysis for this RMP, as well as more than 120 industrial sources of emissions and biogenic emissions. The RFD emissions for the Vernal and Little Snake offices were estimated for only one scenario (maximum development). RFD emissions for the White River Field Office (WRFO) were estimated for four different alternatives.

The cumulative emissions calculated for the CRVFO analysis included emissions from corresponding scenarios for the three other field offices. Alternative A cumulative emissions included Alternative A CRVFO emissions, plus Alternative A emissions from WRFO, plus maximum development emissions from Little Snake Field Office, plus maximum development emissions from Vernal Field Office, plus all other reasonably foreseeable future actions (RFFA) sources. Alternative B (Preferred Alternative) cumulative emissions included CRVFO Alternative B emissions (Preferred Alternative), plus WRFO Alternative B emissions, plus all other RFD and RFFA sources. The cumulative emissions for Alternative C included CRVFO Alternative C (or Alternative B emissions because they are identical), plus WRFO Alternative C emissions, plus all other RFD and RFFA sources. Therefore, the only difference in the cumulative emissions between Alternatives B (Preferred Alternative) and C is the difference between the WRFO Alternative B and C emissions (see page 4-14 of the Air Resources Technical Support Document).

## **1.9 VISIBILITY IMPACTS**

**Comment Summary:** Comment letters stated that good visibility is important and requested BLM to take more action to mitigate future visibility impacts. Also, the writers questioned the process and implementation of the prevention of significant deterioration (PSD) program.

**Response:** BLM recognizes that visibility is an important characteristic to residents and visitors to Colorado and recognizes its role in protection of atmospheric values. The management actions proposed under each alternative include strategies to reduce emissions from oil and gas activities that contribute toward visibility impairment. With those strategies in place, impacts to visibility from potential BLM authorized oil and gas activities within the planning area are predicted to be zero or negligible.

The cumulative visibility impacts estimated in the modeling analysis for the Draft RMP/Draft EIS are useful for comparing potential impacts between alternatives however, their use as a definitive prediction of actual impacts is limited for several reasons. The methodologies used to calculate visibility impairment from modeling results are designed to estimate impacts from a single stationary source, and their use for estimating impacts from total multiple regional sources may result in over-predictions. Based on the complex nature of visibility impairment chemistry, the modeling tends to over-predict visibility pollutant concentrations and, although these over-predictions may not be significant for the project analysis, they can be significant for the cumulative analysis. The predictions of future cumulative impacts may not fully take into account the reductions in visibility impairing pollutants that will be achieved through additional regulation of emission sources and control of visibility impairing pollutants in the future (as seen in actual visibility monitoring data, which shows stagnant or improved visibility at most western locations over the last several years).

Actual visibility impacts are caused by a variety of industrial sources, mobile sources, biogenic sources, smoke, and meteorological conditions. The management of cumulative visibility impacts at Colorado's Class I areas and Scenic Views is best achieved through a collaborative effort among agencies that authorize and permit industrial development, agencies that manage air resources and regulate air emission sources, agencies that manage lands where visibility has been identified as an important characteristic for protection, industry, and the public. The BLM, under this RMP, cannot mitigate all of the impacts from all the source categories that

contribute to visibility degradation. The appropriate mechanism for doing so is through the state's Regional Haze State Implementation Plan.

The PSD program and subsequent analyses required for sources obtaining PSD permits apply to a specific list of major station source categories. CDPHE has been delegated authority for issuing permits under this program. CDPHE is also responsible for determining baseline and conducting increment consumption analyses. BLM is not responsible for conducting a PSD increment consumption analysis for this planning-level document.

The modeling conducted for this analysis predicted potential impacts for Alternative A above the PSD 24-hour PM<sub>10</sub> increment for “project” sources. This prediction demonstrates that impacts to air quality may be beginning to occur for the level of development and the emission controls specified under Alternative A. Higher levels of development with additional controls were modeled in other alternatives, and no impacts were predicted. This additional modeling demonstrates the purpose of modeling a range of alternatives: to determine at what level of development and what control effectiveness impacts do and do not occur.

### **1.10 OIL AND GAS ANALYSIS**

**Comment Summary:** Some commenters stated that the analyses of the oil and gas development projections in the Draft RMP/Draft EIS, in coordination with the air quality review, indicate that the RMP would be in violation of federal air quality standards

**Response:** The air analysis shows that impacts to air quality from the proposed “project” levels of development for Alternatives B, C, and D are estimated to be below National Ambient Air Quality Standards (NAAQS), Colorado Ambient Air Quality Standards (CAAQS), PSD increments, and visibility and deposition thresholds. Ozone episodic modeling results predict a maximum incremental increase in ozone concentrations caused by project sources of 2.5 ppb and average incremental increases less than 1 ppb. Results for Alternative A show potential impacts above the particulate matter of 10 micrometers or less (inhalable) (PM<sub>10</sub>) 24-hour PSD increment at a single receptor outside of any Class I or sensitive Class II area and potential impacts to visibility at Flat Tops Wilderness Area and Roan Cliffs Scenic View. The higher predicted concentrations of particulate matter and nitrogen oxides for Alternative A over the other alternatives is most likely the result of the lower fugitive dust control, higher truck traffic, no electrification of compression, and other differences in control strategies between the alternatives. The results demonstrate that at the “project” emission rates modeled under Alternative A, some impacts to air quality begin to be observed, while the “project” emission rates associated with the other alternatives do not predict any significant or adverse impacts to air quality.

The cumulative analysis predicts potential impacts to air quality from cumulative sources for the following: 1-hour nitrogen dioxide (NO<sub>2</sub>), 24-hour and annual PM<sub>10</sub> and particulate matter of 2.5 micrometers or less (fine) (PM<sub>2.5</sub>), and visibility. This analysis includes impacts from emissions from CRVFO RFD wells plus more than 32,600 additional wells from a 2006 baseline located within the modeling domain on private, state, Forest Service, and BLM surface. In addition, impacts from emissions from more than 120 industrial sources within Colorado and 10 major industrial sources within Utah are included in the cumulative analysis. Control of the emissions from these sources and mitigation of potential impacts from those emissions require a collaborative effort among several agencies with responsibility for authorization of oil and gas and other industrial development and agencies with responsibility for managing and controlling air emissions. The BLM has proposed significant mitigation in the form of air emission controls and reduction strategies for those actions which it authorizes within each alternative of this RMP.

### 1.11 OZONE

**Comment Summary:** A few comments questioned the assumptions in the ozone model and the ozone mitigations.

**Response:** The Air Resources Technical Support Document includes a thorough description of the ozone modeling completed for both project and cumulative impacts and gives a detailed explanation of how to assess impacts from this regional pollutant. Ozone is formed through a complex series of atmospheric reactions that depend on sunlight and the presence of photochemical reactants. The formation of ozone is influenced by emissions of these reactants from local industrial, mobile, and natural sources, regional transport of ozone from upwind areas, and intrusion of naturally occurring ozone from the upper atmosphere. Cumulative sources of ozone precursor emissions include industrial, mobile, and biogenic sources as well as ozone transport from other regions. Based on future design values, the model did not show readings that exceed the ozone standard at any rural monitors west of the Continental Divide. The modeled impacts from project sources were predicted to be between 0.7 to 2.5 ppb (average daily maximum).

Because of the longer hours of sunlight, warmer temperatures, and increased albedo effect during the summer months, ozone formation was previously perceived to be only a summertime phenomenon. Recent observations and research have discovered that snow cover in the winter time can mimic the albedo effects of summertime and that snow cover combined with other meteorological characteristics and the presence of high NO<sub>x</sub> and VOC concentrations can result in elevated concentrations of ozone. BLM recognizes that wintertime ozone formation has occurred in other basins with significant oil and gas development and may be occurring within the planning area. Therefore, management actions for tracking and controlling ozone precursor emissions, air monitoring, and air modeling have been included in the AQMP to address this potential concern. Winter ozone formation was not included in the modeling for the air analysis for this RMP because computer model algorithms that simulate winter ozone formation are not currently available.

## 2.0 CLIMATE CHANGE

There were 18 comments concerning climate change.

### 2.1 GREENHOUSE GAS EMISSIONS

**Comment Summary:** Commenters stated that reduction of greenhouse gasses and climate change are important to them and questioned whether a greenhouse gas or climate change model was completed.

**Response:** Greenhouse gas emissions were calculated using best available data at the time of the analysis. Impacts were evaluated using program guidance available at the time of the analysis. There are no reliable models currently available to analyze impacts to global climate. Appendix L – Comprehensive Air Resource Protection Protocol, along with Appendix G – Best Management Practices and Conservation Measures, offer adaptive management techniques and best management practices (BMPs) for reducing greenhouse gas emissions.

## 3.0 SOILS

There were 44 comments with issues coded for soils.

### 3.1 FRAGILE AND SALINE SOILS

**Comment Summary:** Several comments stated that the RMP needs to consider protections for fragile and saline soils.

**Response:** The Proposed RMP/Final EIS considers protections for fragile and saline soils, in addition to the steep slopes protections, to reduce soil disturbances (see Chapter 2 – Table 2-2).

### **3.2 IMPACTS OF TRAVEL MANAGEMENT ON SOILS**

**Comment Summary:** Comments on the Draft RMP/Draft EIS emphasized the need to limit travel and access to protect soils.

**Response:** A reduction in user-created travel routes can help protect soils. The Proposed RMP/Final EIS travel designations reduce redundant and damaging routes field office-wide. Special designations such as ACECs, and other identifications, such as managing lands to protect wilderness characteristics, often include a reduction or limitation on travel routes that also help to protect soils. Proposed stipulations for surface-disturbing activities, use, and occupancy would provide direct protections to soils if new routes are proposed.

### **3.3 SOIL PROTECTION**

**Comment Summary:** Generally comments were in support of soil protection and minimizing erosion.

**Response:** Proposed stipulations for surface-disturbing activities, use, and occupancy would provide direct protections to fragile/saline soils and steep slopes.

## **4.0 WATER RESOURCES**

There were 398 comments with issues coded for water resources.

### **4.1 STREAMSIDE MANAGEMENT ZONE STIPULATION**

**Comment Summary:** Several letters expressed concern that the streamside management zone stipulation in Alternatives B and C is unnecessarily restrictive.

**Response:** Ephemeral and intermittent water bodies are defined by the United States Geological Survey (USGS) in the National Hydrography Dataset and field verified. The no surface occupancy (NSO) stipulation is an effort to limit soil transport and to maintain the watershed drainage network. The range of alternatives in the Draft RMP/Draft EIS as well as in the Proposed RMP/Final EIS incorporates management alternatives with and without stipulations for hydrological features.

### **4.2 WATER RIGHTS**

**Comment Summary:** Commenters noted that the RMP must recognize both decreed absolute and conditional water rights.

**Response:** The proposed alternatives in the Draft RMP/Draft EIS recognize all valid and existing rights, including conditional water rights. However, pending changes not yet adjudicated by the time the ROD is signed for the RMP cannot be considered valid existing rights. The proposed alternatives in the Draft RMP/Draft EIS also recognize the necessary rights-of-way (ROWs) or pre-FLPMA ROWs associated with water facilities and putting water to beneficial use.

### **4.3 SALINITY IN THE COLORADO RIVER**

**Comment Summary:** Comment letters expressed concern about the assumption regarding vehicle use on soils contributing to salinity in the Colorado River.

**Response:** A reduction in user-created travel routes can help protect water resources. The Proposed RMP/Final EIS travel designations reduce redundant and damaging routes field office-wide. Special designations (e.g., Areas of Critical Environmental Concern [ACECs]) and other identifications, such as managing lands to protect wilderness characteristics, often include a reduction or limitation on travel routes that also help to protect water resources. Proposed stipulations for surface-disturbing activities, use, and occupancy would provide direct protections to water resources if new routes are proposed.

#### **4.4 PROTECTION OF WATER RESOURCES IN THE THOMPSON DIVIDE AREA**

**Comment Summary:** Comments expressed support for protection of water resources in the Thompson Divide Area and anti-energy development in the Thompson watershed.

**Response:** The Draft RMP/Draft EIS and the Proposed RMP/Final EIS evaluated a range of future oil and gas leasing scenarios for currently unleased portions of BLM lands within the Thompson Divide area, ranging from closing all unleased areas to making those lands available for leasing. The Draft RMP/Draft EIS contained NSO and controlled surface use (CSU) stipulations to protect water resources field office-wide from all surface-disturbing activities, use and occupancy. Stipulations in the Proposed RMP/Final EIS were updated to be more comprehensive to protect water resources, specifically drinking water resources, and associated riparian habitat.

#### **4.5 IMPACTS TO SURFACE AND GROUND WATER FROM FLUID MINERAL DEVELOPMENT**

**Comment Summary:** Comment letters felt that the Draft RMP/Draft EIS analysis failed to consider recent science on the risks of oil and gas development to water resources and strategies to mitigate such risks. Other letters felt the Draft RMP/Draft EIS failed to adequately analyze potential water impacts from hydraulic fracturing.

**Response:** Additional analysis for water quality and quantity issues as they relate to fluid minerals have been incorporated into the Proposed RMP/Final EIS water resources and fisheries sections. A BMP appendix (Appendix G) was added to the Proposed RMP/Final EIS and it includes implementation-level actions to protect water resources. A monitoring appendix (Appendix S) was included in the Proposed RMP/Final EIS that displays water resources monitoring being performed by the CRVFO. In addition BLM cooperates with COGCC in the protection of water resources including water sampling and monitoring protocols for ground and surface water sampling and public water system protection.

#### **4.6 WATER USAGE**

**Comment Summary:** A few comments questioned BLM's estimates about water usage from oil and gas development. They appeared low.

**Response:** Water depletion estimates were defined and agreed upon through a programmatic biological assessment with the USFWS (BLM 2008). Projections are based on the RFD scenarios of fluid mineral activity across western Colorado for the next 15 – 20 years. The assumptions used to arrive at the RFD's for each field office were based on current development trends, downspacing of drilling units, maturing oil & gas fields, predicted energy needs for the future, and the overall professional opinion of field office and State Office Geologists and Petroleum Engineers, as well as private industry professionals. In the CRVFO, fresh water (0.77af) is primarily used for drilling, dust abatement, and hydrostatic testing. The majority of other water uses come from recycled/reused water sources.



#### **4.7 PROTECTION OF DRINKING WATER SUPPLIES (MUNICIPAL WATERSHEDS AND PUBLIC WATER SUPPLIES)**

**Comment Summary:** Comments suggested the Draft RMP/Draft EIS list of municipal watersheds was incomplete and not well defined.

**Response:** The Final RMP was updated to include more comprehensive definitions and protections to municipal watersheds and public water supplies. Options for NSO and/or CSU lease stipulations in municipal watersheds were considered across alternatives. The list of public water supplies was expanded to include all recognized COGCC 317B water sources, as well as some smaller drinking water providers, such as Home Owners Associations or rural unincorporated communities, that are participating in Colorado's Source Water Assessment and Protection (SWAP) program.

#### **4.8 INCOMPLETE LIST OF IMPAIRED WATER QUALITY SEGMENTS**

**Comment Summary:** Comments suggested the Draft RMP/Draft EIS list of impaired water quality (303d) and Monitoring & Evaluation list was incomplete.

**Response:** The Final RMP was updated to include the most recent version of the State of Colorado's Section 303(d) list of impaired waters and Monitoring and Evaluation list (WQCC, 2010).

#### **4.9 WILD AND SCENIC RIVERS**

**Comment Summary:** Comments included concerns over possible designation of Wild and Scenic Rivers (WSR) segments and implications on future water right development. Many comments were in support of the stakeholder's Alternative (B2), which defers WSR designation along the main stem of the Colorado River.

**Response:** The Final RMP was updated to clarify impacts from potential designation of WSR segments. In addition, the Final RMP recognizes all valid and existing rights - including conditional water rights in the decisionmaking process. Also see responses under the WSR section.

#### **5.0 VEGETATION**

There were 154 comments with issues coded for vegetation.

##### **5.1 MONITORING WEEDS**

**Comment Summary:** Comment letters stated that the BLM needs to increase weed monitoring and treatment.

**Response:** Monitoring for the presence of noxious weeds and evaluating effectiveness are shared responsibilities. BLM staff periodically monitor ROWs, oil and gas facilities, and other disturbances for the presence of weeds; however, the BLM does not have the manpower to visit all disturbed areas in a timely fashion, so the project proponents are given responsibility for monitoring their projects. In addition, BLM encourages cooperative weed management with private landowners and would like to be informed of weed occurrences on BLM lands adjacent to private lands.

##### **5.2 PROTECT INTACT NATIVE VEGETATION COMMUNITIES.**

**Comment Summary:** Some of the comments received expressed that the disturbance of intact native vegetation and sensitive natural habitats should be minimized to prevent fragmentation of intact ecosystems, provide quality wildlife habitat, and prevent the introduction and proliferation of weeds.

**Response:** The alternatives in the Proposed RMP/Final EIS include objectives, stipulations, and actions that give priority to protecting areas of relict or remnant vegetation with minimal evidence of human disturbance or invasive species as significant natural plant communities (SNPC) for their scientific and ecological values. The alternatives also include stipulations and management actions to protect and restore sagebrush ecosystems that provide habitat for big game, sage-grouse, and other sagebrush-dependent species.

### **5.3 PROTECT VEGETATION THROUGH TRAVEL MANAGEMENT**

**Comment Summary:** A few commenters felt BLM should reduce travel routes in order to protect vegetation and limit the spread of weeds.

**Response:** A reduction in motorized travel routes can help protect vegetation and limit the spread of weeds. The Proposed RMP/Final EIS travel designations reduce redundant and damaging routes field office-wide. Special designations such as ACECs and other identifications, such as managing lands to protect wilderness characteristics, often include a reduction or limitation on travel routes that also help to protect vegetation and reduce the spread of weeds. Proposed stipulations for surface disturbing activities, use, and occupancy would provide direct protections to vegetation if new routes are proposed.

## **6.0 FISH AND WILDLIFE**

There were 659 comments with issues relating to fish and wildlife.

### **6A AQUATIC WILDLIFE**

#### **6A.1 MANAGEMENT DESIGNATIONS FOR FISH**

**Comment Summary:** Commenters wanted BLM to develop management designations for fish and wildlife.

**Response:** Section 202(c) of FLPMA (43 USC 1712) requires that in developing land use plans, the BLM use and observe the principles of multiple use and sustained yield. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These land use plan decisions establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives (management actions and allowable uses).

Land use plan decisions for fish and wildlife involve designation of priority species and habitats recognized as significant for at least one factor, such as density, diversity, size, public interest, remnant character, or age. The CRVFO has considered special designations, stipulations, management actions and best management practices for the protection of aquatic species and their habitat.

#### **6A.2 STIPULATIONS FOR FISH**

**Comment Summary:** Some of the comments received suggested that the BLM does not need additional stipulations for the protection of fish and wildlife and their habitat.

**Response:** NSO stipulations address habitat protection issues as opposed to timing limitations (TLs), which address disturbance issues. TLs are a common mitigation found in RMPs to protect natural resource values. The CRVFO currently and successfully applies TLs on land use activities. Colorado Parks and Wildlife's (CPW's) Actions to Minimize Adverse Impacts to Wildlife Resources recommends stipulations such as TLs to avoid, minimize, and mitigate the adverse impacts of land use activities on wildlife.

### **6A.3 TRAVEL MANAGEMENT IMPACTS ON FISH**

**Comment Summary:** Comments regarding the closure of some routes to protect some fish populations. Focus on Abrams Creek and cutthroat trout.

**Response:** As opposed to open area travel designations, limited travel areas with designated route systems protect aquatic habitat by eliminating unwanted cross-country travel that results in increased erosion, sedimentation, and turbidity. The Draft RMP/Draft EIS offers four alternatives for future management and analysis of those alternatives on aquatic wildlife.

### **6A.4 FISHERIES DATA**

**Comment Summary:** Commenters suggested the BLM used outdated or incorrect fisheries data.

**Response:** The CRVFO utilizes aquatic wildlife data from a variety of sources. CPW is a principal source for aquatic species data. No CPW aquatic GIS data are currently available for use. It is still being created and completed. In the absence of this data, BLM uses survey information from CPW, BLM and in some cases USFS to identify those waters known or suspected to contain fish. The CRVFO will use the most current aquatic wildlife data when available. It could be that perceived data omissions could be due to streams not located on or within the influence zone of BLM management which are not shown or addressed in the planning effort.

### **6A.5 AQUATIC SPECIES ANALYSIS**

**Comment Summary:** Concerns were expressed that the aquatic species analysis did not support the need for proposed or additional stipulations.

**Response:** CEQ regulations for implementing NEPA Section 1502.21 allow for incorporation by reference. It states that agencies will incorporate material into an EIS by reference when the effect will be to cut down on bulk without impeding agency and public review of the action. The incorporated material will be cited in the statement and its content briefly described.

The aquatic wildlife analysis provided upfront an issues, assumptions, and methods section that framed impact analysis that included narratives on sediment and turbidity, habitat alteration, loss or reduction of streamside vegetation cover, water quality alteration, water depletions, introduction or spread of aquatic nuisance species or disease vectors, etc. Subsequently, these topics were not explained in detail each time within the relevant sections of the analysis.

### **6A.6 COMPLIANCE WITH THE COLORADO BLM OIL AND GAS LEASING REFORM IMPLEMENTATION STRATEGY**

**Comment Summary:** Concerns were expressed that the CRVFO is not complying with the Colorado BLM Oil and Gas Leasing Reform Implementation Strategy.

**Response:** The BLM Colorado State Office is currently working on how to implement lease stipulation consistency as per the Colorado BLM Oil and Gas Leasing Reform Implementation Strategy.

### **6A.7 AQUATIC WILDLIFE MAPS AND MAPPING**

**Comment Summary:** A few commenters felt the BLM did not present sufficient maps showing the location and extent of some aquatic wildlife stipulations.

**Response:** BLM has little mapped information on some species (e.g., amphibians). In other cases known populations and occurrences are small and difficult to show on maps at the scales presented in the RMP. In areas of known or suspected habitat of special status species, or habitat of other species of interest, a biological inventory is required before use or operations would be approved. The inventory would be used to determine the application of stipulations and prepare mitigating measures to reduce the impacts of surface disturbance on the affected species or their habitats.

#### **6A.8 STREAM BUFFERS**

**Comment Summaries:** While some commenters expressed that buffers were either too large or not needed along streams, other commenters suggested that identified buffers were too small to effectively protect fish, most notably, cutthroat trout.

**Response:** Stream buffers when coupled with several other complementary stipulations for other resource values (e.g. steep slope soil stipulations) effectively extend the buffer along the majority of streams. Concerns about accidental spills as the rationale to increase buffers would be largely impossible as the areas of primary concern (high potential oil & gas areas), have already been leased and the vast majority are in production. New NSOs would be difficult if impossible to impose retroactively given existing valid rights. Many of the access roads which facilitate oil and gas vehicular traffic adjacent to streams are county roads for which BLM has no authorization. In addition, CSU stipulations extend protections along streams which help to further minimize impacts.

#### **6A.9 INADEQUATE ANALYSIS OF EFFECTS OF ACCIDENTAL SPILLS/CONTAMINANTS ON FISH**

**Comment Summaries:** It was suggested but the public comments that additional analysis of the effects of spills on fish and cutthroat trout in particular should be done and that larger stream buffers would help protect from these.

**Response:** Some additional analysis of the effects of spills on fish was conducted. BLM does not make RMP decisions regarding spills but recognized the potential for such given select programs that increase the risk. Select stipulation should help to reduce potential effects and BMPs and Conditions of Approval (COAs) are identified to reduce the risk of spills associated with select program activities.

#### **6A.10 PRIORITY HABITATS FOR AQUATIC SPECIES**

**Comment Summaries:** Commenters were concerned about the broad identification of priority habitats for aquatic species.

**Response:** The *Land Use Planning Handbook* requires the identification of priority habitats. All lands within a watershed contribute to the health of stream and riparian habitats. These aquatic features are components of a hydrologic system that may influence habitat where fish can and do exist. In addition, fish were not the only aquatic species considered when identifying priority habitats as amphibians were also considered and are more tied to some of these priority habitat types.

#### **6A.11 PROTECTIONS FOR STATE FISH HATCHERIES**

**Comment Summaries:** Colorado Parks and Wildlife addressed the protection of fish hatcheries including the spring recharge zone. Commenters concerns involved the mapping of stipulations, the extent of the protections and closing the area to leasing.

**Response:** BLM corrected the map error on CRV-NSO-17 found in the Draft RMP/Draft EIS. The larger buffer for the spring recharge zone is beyond the scope of this RMP as the majority of the land is administered by the USFS. Leasing of USFS surface land is at the discretion of the USFS and not the BLM. BLM surface lands and federal mineral estate upstream to the USFS boundary are protected by NSO as are subsurface down to 1,500 feet in Alternative B – Proposed RMP.

#### **6A.12 RESTRICTIONS ON OIL & GAS ACTIVITIES TO PROTECT STREAMS AND RIVERS**

**Comment Summaries:** Some of the comments received areas closed to leasing, or greater NSO than exists or is proposed.

**Response:** As related to oil and gas development, 88% of the area mapped as high potential for gas resources is already leased, it is too late to close to leasing in the area identified as high potential as it has already been leased. The majority of these leased lands are also already in production which limits opportunities to add stipulations (as is possible to expiring leases). At this point, in addition to whatever stipulations are on a given lease, the BLM can apply site specific BMPs and COAs to reduce potential impacts.

### **6B TERRESTRIAL WILDLIFE**

#### **6B.1 MANAGEMENT DESIGNATIONS FOR TERRESTRIAL WILDLIFE**

**Comment Summary:** Some of the comments received wanted BLM to develop management designations for terrestrial wildlife.

**Response:** Section 202(c) of FLPMA (43 USC 1712) requires that in developing land use plans, the BLM use and observe the principles of multiple use and sustained yield. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These land use plan decisions establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives (management actions and allowable uses).

Land use plan decisions for terrestrial wildlife involve designation of priority species and habitats recognized as significant for at least one factor, such as density, diversity, size, public interest, remnant character, or age. The CRVFO has considered special designations, stipulations, management actions and best management practices for the protection of wildlife and wildlife habitat.

#### **6B.2 ROUTE DENSITY STANDARDS**

**Comment Summary:** Commenters stated that the RMP should set route density standards to protect important wildlife habitat.

**Response:** A travel management system's road density itself is not an exclusive or conclusive factor in determining habitat effectiveness for wildlife. The species of concern, travel designations, the location of routes, the types of use, season of use and the level of use; are also important factors that affect: habitat security, habitat avoidance, habitat fragmentation, and disturbance from human activities. No general, prescriptive field office-wide route standard (miles of routes/square mile of habitat) for wildlife was considered in the Draft RMP/Draft EIS because of the multiple-use management emphasis and the emphasis to manage wildlife habitat for a multiple of species. However, stipulations (e.g., NSO, CSUs, and TLs) and management actions (e.g., area route designations and winter travel closures) are being considered to protect wildlife and important wildlife habitats on a geographic or temporal basis.

### **6B.3 WINTER CLOSURES TO ALL HUMAN USE**

**Comment Summary:** A few comments stated that BLM should close core wildlife areas in the winter to all human use.

**Response:** No alternative is proposing to annually close big game winter ranges to all human use. Studies show recreation activities can disturb wildlife; however, BLM has no data that the current level of winter recreation use in the CRVFO is causing substantial reductions in habitat effectiveness or big game population declines.

Decisions about human closures are complex because they affect a multitude of public land resources, and not just wildlife. BLM must weigh all resources and uses when making decisions about closures. Factors such as staffing, funding, and effectiveness must also be considered in the planning process. The fragmented public-private landscape with so much wildland urban interface (WUI) along with the anticipated reduction in funding and projected staffing levels for enforcement, makes closing big game winter ranges to human use unrealistic to effectively implement.

The CRVFO's objective is to minimize big game stress and disturbance from surface occupancy and surface-disturbing activities on winter ranges, winter concentration areas, severe winter ranges, migration corridors, and birthing areas.

To achieve this objective, all action alternatives propose an increase the number of big game winter ranges closed seasonally to public motorized and mechanized travel. Among the other management actions being considered is a flexible management action that can be applied when and where it is most needed. At the request of CPW, with concurrence by the BLM authorized officer, BLM would close specific areas to human activity and dogs during severe winter weather conditions as defined by a combination of factors including snow depth, snow crusting, daily mean temperatures (long periods of cold temperatures), and concentrations of animals.

### **6B.4 STIPULATIONS FOR THE PROTECTION TERRESTRIAL WILDLIFE AND THEIR HABITAT**

**Comment Summary:** Comments were received stating the BLM does not need additional stipulations for the protection terrestrial wildlife and their habitat.

**Response:** NSO and CSU stipulations address habitat protection issues as opposed to TL stipulations, which address disturbance issues. Stipulations are a common mitigation found in RMPs to protect natural resource values. The CRVFO currently and successfully applies stipulations on land use activities. CPW's Actions to Minimize Adverse Impacts to Wildlife Resources recommends stipulations to avoid, minimize, and mitigate the adverse impacts of land use activities on wildlife.

### **6B.5 TRAVEL MANAGEMENT IMPACTS ON TERRESTRIAL WILDLIFE**

**Comment Summary:** Some comments expressed support for a field office-wide prescriptive standard (miles of routes/square miles) or threshold in order to reduce impacts on terrestrial wildlife especially big game.

**Response:** As opposed to open area travel designations, limited travel areas with designated route systems protect wildlife habitat by eliminating unwanted cross-country travel. The Draft RMP/Draft EIS offers four alternatives for future management and analysis of those alternatives on terrestrial wildlife.

The terrestrial wildlife analysis in the Draft RMP/Draft EIS and Proposed RMP/Final EIS specifically states that no prescriptive standard (miles of routes/square miles) is being proposed by BLM. The analysis discusses route density for areas covered by the priority (core) wildlife area stipulation by alternative. In lieu of closing routes year-round the CRVFO is proposing about 56,000 acres of seasonal limitations in Alternative B – Proposed RMP. The CRVFO would close 131,600 acres to motorized and mechanized travel from December 1 to April 15 to protect terrestrial wildlife during the critical winter period. In addition the CRVFO would close specific areas to human activity and dogs during severe winter weather conditions as defined by a combination of factors including snow depth, snow crusting, daily mean temperatures (long periods of cold temperatures), and concentrations of animals.

#### **6B.6 TERRESTRIAL WILDLIFE DATA**

**Comment Summary:** A few commenters felt that the BLM used outdated or incorrect terrestrial wildlife data.

**Response:** The CRVFO utilizes terrestrial wildlife data from a variety of sources. CPW is a principal source for fish and wildlife data. CPW data are regularly updated and GIS shapefiles are supplied to the BLM. For example, along with BLM fisheries data, the CRVFO used CPW data and some USFS data to identify those waters known or suspected to contain fish. The CRVFO will use the most current fish and wildlife data available and will revise the Proposed RMP/Final EIS accordingly.

#### **6B.7 TERRESTRIAL WILDLIFE ANALYSIS**

**Comment Summary:** Many comments expressed that the terrestrial wildlife analysis did not support the need for proposed or additional stipulations.

**Response:** CEQ regulations for implementing NEPA Sec. 1502.21 allow for incorporation by reference. It states that agencies will incorporate material into an EIS by reference when the effect will be to cut down on bulk without impeding agency and public review of the action. The incorporated material will be cited in the statement and its content briefly described.

The terrestrial wildlife analysis provided upfront an assumptions and methods section that included narratives on disturbance, direct habitat loss, habitat modification, habitat fragmentation, reduced habitat effectiveness, direct mortality, habitat avoidance, interference with movement patterns and impact estimation. Subsequently, these topics were not explained in detail each time within the relevant sections of the analysis.

#### **6B.8 COMPLIANCE WITH THE COLORADO BLM OIL AND GAS LEASING REFORM IMPLEMENTATION STRATEGY**

**Comment Summary:** Compliance with the Colorado BLM Oil and Gas Leasing Reform Implementation Strategy was a concern for many commenters.

**Response:** The BLM Colorado State Office is currently working on how to implement lease stipulation consistency as per the Colorado BLM Oil and Gas Leasing Reform Implementation Strategy.

#### **6B.9 MAPS OF TERRESTRIAL WILDLIFE STIPULATIONS**

**Comment Summary:** Comments were received stating the BLM did not present maps showing the location and extent of some terrestrial wildlife stipulations.

**Response:** BLM has little mapped information on some species (e.g., amphibians). Other species use of local habitats is highly variable (e.g., birds of conservation concern). In areas of known or suspected habitat of special status species, or habitat of other species of interest (e.g., raptor nest nesting habitat, elk calving areas, or significant natural plant communities), a biological inventory is required before use or operations would be approved. The inventory would be used to determine the application of stipulations and prepare mitigating measures to reduce the impacts of surface disturbance on the affected species or their habitats.

#### **6B.10 RECREATION IMPACTS ON TERRESTRIAL WILDLIFE**

**Comment Summary:** A couple of comment letters stated that Extensive Recreation Management Area (ERMA) and Special Recreation Management Area (SRMA) designations place too much emphasis on recreation at the expense of natural resources and wildlife.

**Response:** SRMA and ERMA designations do not indicate that high-quality natural resources would not be maintained. In fact, proposed recreation designations, such as the King Mountain SRMA, require that high-quality natural values are maintained to support the targeted wildlife-related recreational activities.

#### **6B.11 CARRYING CAPACITY ANALYSIS FOR SPECIFIC AREAS**

**Comment Summary:** It was suggested by Pitkin County and a few others that BLM should develop a carrying capacity analysis for specific areas (i.e., Crown, Light Hill and Arbaney/Kittle) to use as a basis for determining to what extent limitations are necessary to maintain natural resources.

**Response:** A major difficulty with developing multi-resource carrying capacity models is in finding effective, measurable, and reciprocal monitoring metrics that are within BLM's management authority and that are capable of identifying which factors, and to what relative degree, influence the resources. A number of environmental factors other than seasonal livestock grazing and seasonal recreation use affect wildlife abundance and use, many of which vary through space and time in ways that cannot be predicted or controlled. For example, forage production is often used as an indicator of carrying capacity for big game ungulates (hoofed grazers) and livestock, but is mostly unaffected by recreation use and profoundly affected by fluctuations in the amount and seasonal distribution of precipitation.

Developing a multi-resource carrying capacity model for small areas such as The Crown (9,000 acres) is also problematic because it represents a small portion of the total home range of some or all of the large animals using it, whether migratory or nomadic native ungulates such as deer, and seasonal-use livestock such as cattle. Consequently, wildlife abundance and habitat use in a small area may be more strongly affected by factors occurring outside that area, many of which may be attributable to human activities and resource uses on lands beyond BLM's management authority, and potentially outside the planning area boundaries. For example, CPW's mule deer Data Analysis Unit (DAU) Plan D-13 (CPW 2011x), encompasses more than 1,000 square miles versus 14 square miles for The Crown. The DAU Plan lists a variety of factors affecting mule deer numbers and seasonal use. These factors include limited winter range; unfavorable range conditions caused by livestock use, weed infestation, and drought; low and decreasing fawn ratios (lower reproductive rate); competition with elk; and impacts from recreation use and land developments. Even these factors are not isolated but interact in various ways. For example, much of the winter range is on private land along the Colorado Highway 82 corridor, where much of the land development and ever-increasing recreation use are concentrated. CPW (2011) alludes to this issue indirectly by noting that nearly half (45 percent) of the winter range in DAU D-13 is on private land without conservation easements to protect wildlife habitat and use.



For these reasons, BLM has concluded that developing a multi-resource carrying capacity model for The Crown in connection with the RMP is infeasible and unrealistic. Instead, BLM believes livestock grazing and recreation are best balanced with the needs of wildlife by applying sound management practices designed to maintain and improve range condition and providing for types, locations, and periods of recreation unlikely to have significant adverse impacts on seasonally important patterns of wildlife movements and habitat use. Because future conditions in The Crown may deviate from current expectations through influences arising either within The Crown or the larger area, BLM will periodically assess whether goals are being met and, if not, apply adaptive management to modify one or more aspects of resource use and protection to restore an appropriate balance.

## **7.0 SPECIAL STATUS SPECIES**

There were 200 comments with issues coded for special status species. Some comments pertaining to special status plants dealt with the designation and management of ACECs for their protection and are addressed in the ACEC section of this appendix. Some comments were generic to wildlife and may also be discussed in the aquatic or terrestrial wildlife sections above.

### **7A SPECIAL STATUS SPECIES – PLANTS**

#### **7A.1 PARACHUTE PENSTEMON AND DEBEQUE PHACELIA**

**Comment Summary:** Some comments expressed the Proposed RMP/Final EIS should expand the Mount Logan Foothills ACEC to include designated critical habitat for Parachute penstemon or provide NSO stipulations to protect suitable habitat within the Mount Callahan Critical Habitat unit.

**Response:** The listing of Parachute penstemon and DeBeque phacelia as threatened species and the Designated Critical Habitat maps are new information since the Draft RMP/Draft EIS was initiated. The Mount Logan Foothills ACEC boundary was modified slightly to include more occupied habitat for Parachute penstemon. An NSO stipulation was applied to the entire ACEC to protect suitable habitat for listed and sensitive plants within the ACEC. The ACEC was not expanded to incorporate all of the Mount Callahan Critical Habitat Unit because most of the critical habitat unit has already been leased and the unleased portions do not contain suitable habitat for Parachute penstemon.

Additional inventory and monitoring will be conducted as personnel and funding allow. Surveys are conducted for all surface-disturbing activities in potential habitat for special status species. Results of surveys and USFWS Section 7 consultation will be used to develop mitigation measures to avoid or minimize impacts to these plants.

#### **7A.2 HARRINGTON'S PENSTEMON STATUS AS BLM SENSITIVE SPECIES**

**Comment Summary:** One commenter indicated that *Penstemon harringtonii* should not be listed as a BLM sensitive species.

**Response:** Sensitive plant species designation is under the jurisdiction of the BLM State Director, in cooperation with the Colorado Natural Heritage Program (BLM Manual 6840 2001). Decisions regarding the sensitive species status of *Penstemon harringtonii* are therefore beyond the scope of this RMP and outside the jurisdiction of the CRVFO.

Sensitive species designation is based on four aspects: (1) geographic range, (2) habitat specificity, (3) local abundance, and (4) identified threats to the species or its habitat (Carol Dawson, State Botanist, personal

communication; Rabinowitz 1981). It is possible for a rare plant species to be locally abundant within a restricted geographic range (Rabinowitz 1981). Although *P. barringtonii* is locally abundant, it is an endemic species restricted to a narrow geographic range, with numerous documented losses and identified risks to its habitat, which results in its sensitive species status.

## **7B SPECIAL STATUS SPECIES – AQUATIC WILDLIFE**

### **7B.1 BOREAL TOADS**

**Comment Summary:** A comment letter noted that stipulation CRV-NSO-34 was particularly important for boreal toads and also suggested BLM adopt management prescriptions found in select USFS forest management plans.

**Response:** There are currently no known populations of boreal toad on BLM lands or within the influence zone of BLM management, within the planning area. There is also limited suitable habitat. Populations within the larger CRVFO administrative boundary are located on private or USFS lands outside of the influence zone of BLM management. Proposed water, wetland, and aquatic stipulations; special designations, and BMPs offer protections should a population of boreal toads be discovered on BLM lands.

### **7B.2 ANALYSIS OF IMPACTS ON CUTTHROAT TROUT**

**Comment Summary:** Comments requested more detailed analysis of effects to cutthroat trout from climate change, chemical spills, water impacts, wildfire, flooding etc.

**Response:** The CRVFO has improved the Proposed RMP/Final EIS impact analysis regarding potential impacts from: climate change, wildland fire, hybridization, and fluid mineral development (e.g., contamination and spills) on cutthroat trout. Discussion of some of these topics is limited.

### **7B.3 PROPOSED MANAGEMENT ACTIONS TO PROTECT SPECIAL STATUS FISH AND AQUATIC SPECIES**

**Comment Summary:** Proposed management action and allowable use decisions to protect special status fish and aquatic species were a concern for many commenters.

**Response:** The alternatives in the Draft RMP/Draft EIS and Proposed RMP/Final EIS include a variety of protective stipulations (e.g., NSO, CSU, and TL) that either directly benefit special status aquatic species and priority aquatic habitats. Those stipulations, along with stipulations and special designations for other natural and cultural resources, work together to limit ground-disturbing activities, use, and occupancy. Conservation measures and BMPs can also be added to effectively mitigate potential site-specific impacts at the time of project identification and planning.

### **7B.4 STREAM BUFFERS FOR CUTTHROAT TROUT**

**Comment Summaries:** Comments included the desire to have larger stream buffers of ¼ to ½ mile along cutthroat trout streams. Many comments relate to potential effects from oil and gas development. Cite other plans that have these sized of buffers.

**Response:** Stream buffers when coupled with several other complementary stipulations for other resource values (e.g. steep slope soil stipulations) effectively extend the buffer along the majority of occupied cutthroat streams. Concerns about accidental spills as the rationale to increase buffers would be largely impossible as the areas of primary concern (high potential oil & gas areas), have already been leased and the vast majority

are in production. New NSOs would be difficult if impossible to impose retroactively given existing valid rights. Furthermore, many of the access roads which facilitate oil and gas vehicular traffic adjacent to streams are county roads for which BLM has no authorization. In addition, CSU stipulations extend further along streams which further help to minimize impacts.

## **7C SPECIAL STATUS SPECIES – TERRESTRIAL WILDLIFE**

### **7C.1 IMPACT OF PROPOSED GREATER SAGE-GROUSE DECISIONS ON FLUID MINERAL DEVELOPMENT**

**Comment Summary:** Many commenters supported Alternative A for sage-grouse management because the other alternatives would impact the ability to develop gas resources.

**Response:** A large extent of general and priority greater sage grouse habitat in the RMP planning area is in the northeast part of the CRVFO. The areas mapped as high-potential gas resources and the existing fluid mineral leases are in the western third of the RMP planning area. A small overlap of greater sage grouse habitat and high potential gas resources occurs in Parachute Creek. Stipulations or designations from this planning process would not necessary apply to existing fluid mineral leases.

### **7C.2 CONSERVATION MEASURES FOR GREATER SAGE GROUSE**

**Comment Summary:** Conservation measures such as the greater sage-grouse ACEC were supported by CPW and opposed by parties concerned with the development of oil and gas leases.

**Response:** The BLM is writing a separate EIS to analyze incorporating new greater sage-grouse conservation measures into the RMPs for the five field offices within the BLM Colorado Northwest District, including the CRVFO in Silt, the Grand Junction Field Office, the Kremmling Field Office (KFO), the Little Snake Field Office in Craig, and the WRFO in Meeker.

The greater sage grouse ACEC is in the northeast part of the CRVFO. The areas mapped as high-potential gas resources and the existing fluid mineral leases are in the western third of the RMP planning area. Therefore there is no overlap.

### **7C.3 CANADA LYNX**

**Comment Summary:** A Commenter felt the BLM should consider including NSO stipulations and timing limitations to protect lynx denning and winter habitat, as well as NSO and CSU stipulations to maintain effectiveness and minimize fragmentation of lynx linkage areas.

**Response:** The CRVFO planning area contains both some habitat (approximately 5,300 acres) and linkage areas (approximately 77,000 acres). Linkage areas are not “corridors” in the limited sense of travel routes, but are broad areas of habitat where animals can find food, shelter, and security (USFS 2008a). The corridors link larger forested landscapes located on adjacent White River and Routt National Forest lands. Portions of each linkage offer the components necessary to support and possibly sustain lynx and their prey; however, the majority of vegetation within these linkages is not lynx habitat. Linkage areas can be degraded or severed by developments such as highways or subdivisions.

The USFWS is a formal cooperating agency in the planning process and CRVFO will complete Endangered Species Act Section 7 consultation with the USFWS on proposed actions affecting Canada lynx. BLM will

incorporate necessary actions and mitigation developed through that consultation into the Proposed RMP/Final EIS.

#### **7C.4. SPECIAL STATUS SPECIES - TERRESTRIAL WILDLIFE DATA**

**Comment Summary:** A few commenters felt that the BLM used outdated or incorrect terrestrial wildlife data.

**Response:** The CRVFO utilizes special status species terrestrial wildlife data from a variety of sources. CPW is a principal source for fish and wildlife data. CPW data are regularly updated and GIS shapefiles are supplied to the BLM. For example, along with BLM fisheries data, the CRVFO used CPW data and some USFS data to identify those waters known or suspected to contain fish. The CRVFO will use the most current fish and wildlife data available and will revise the Proposed RMP/Final EIS accordingly.

### **8.0 CULTURAL RESOURCES**

There were 20 comments with issues coded for cultural resources.

#### **8.1 QUALIFICATIONS FOR CULTURAL RESOURCES**

**Comment Summary:** Some comments recommended motorized roads and trails should be cultural resources.

**Response:** Qualifications of cultural resources are defined and protected by federal laws which are outlined in Chapter 3 Affected Environment - Cultural Resources.

#### **8.2 CONSULTATION PROCEDURES**

**Comment Summary:** A commenter felt cultural resource consultation procedures should be provided to the public to understand the proposed management.

**Response:** Cultural resource consultation procedures are outlined under Section 106 of the National Historic Preservation Act and are carried out in conjunction with Bureau programmatic agreements and protocols.

#### **8.3 DATA RECOVERY**

**Comment Summary:** One commenter referenced a presentation by Rand A. Greubel, which states that cultural resources (specifically wickiup sites) are rarely subject to data recovery or scientific review. Commenter states that because scientists do not review these sites they should be placed lower in priority than other resource uses in the area.

**Responses:** All sites discovered and recorded are reviewed scientifically by qualified archaeologists and researchers. The statement quoted is referring to “data recovery” which is specifically in reference to planned excavation in archaeological research. Planned excavation does not always occur on every site based on a variety of factors including but not limited to potential for subsurface cultural remains, anticipated disturbance, or Native American consultation. If a site does not undergo official data recovery, it is still fully documented and its significance is determined for the National Register of Historic Places.

#### **8.4 CULTURAL RESOURCE SURVEY**

**Comment Summary:** A commenter stated the RMP should identify areas to prioritize survey and establish a timeline for completing these inventories. ACECs and dense travel areas should be first priority.

**Response:** Identification of areas to survey is done on a continual basis and occurs within our Section 106 and Section 110 work.

## **8.5 CULTURAL RESOURCE MITIGATION**

**Comment Summary:** There is ongoing damage to cultural sites but we fail to put management prescriptions to mitigate damages.

**Response:** Cultural resources throughout the CRVFO are continually being monitored for adverse effects as part of not only the Section 106 process but also the Section 110 process. Management prescriptions for the mitigation of adverse effects are done on a case-by-case basis to ensure that the resource is protected in the best way possible.

## **8.6 CULTURAL RESOURCE SURVEY**

**Comment Summary:** Recommend designating additional areas to protect cultural sites, establish a priority for completing Class III, and make timeline for 100% survey of entire field office.

**Response:** Class III survey is determined through land use planning (Section 106) as well as probability of occurrence of cultural resources and proactive cultural resource inventory projects (Section 110). These two processes are ongoing and continually increase the survey coverage for cultural resources.

## **8.7 OIL AND GAS DEVELOPMENT HAS INCREASED OUR KNOWLEDGE OF CULTURAL RESOURCES**

**Comment Summary:** One commenter stated the BLM should recognize that oil and gas (O&G) development has increased our knowledge of cultural resources by more inventory and discovery but also that we conduct cultural surveys before construction.

**Response:** Paragraph 2 on page 3-106 does state that "...areas slated for ground disturbance associated with oil and gas development are inventoried for cultural resources, and effects to significant sites are mitigated prior to project implementation..." This being said, some editing will be done to better clarify that if cultural resources are going to be impacted or are inadvertently discovered during any project implementation, "modifications to the undertaking that could avoid, minimize or mitigate adverse effects on historic properties" (36 CFR Part 800.6a) will and does occur.

## **8.8 CULTURAL RESOURCE PROTECTIONS**

**Comment Summary:** One commenter wanted site protections changed from NSO stipulations to CSU stipulations.

**Response:** A proposed CSU stipulation for the protection of cultural resources has been analyzed in the Draft RMP/Draft EIS. Our alternatives vary from 100 meter buffer with no stipulation to 200 meter buffer with NSO stipulation and cover everything in between.

## **8.9 LANDSCAPE PROTECTION**

**Comment Summary:** Another commenter wanted clarification on criteria for determining landscape protection or associated landscape of cultural resources.

**Response:** The criteria for identifying landscape protection are determined by the significance of the landscape to the site, as best described under the "Seven Aspects of Integrity" in the National Register Bulletin.

## **8.10 AREAS OF CRITICAL ENVIRONMENTAL CONCERN TO PROTECT CULTURAL RESOURCES**

**Comment Summary:** One commenter liked using ACECs to protect cultural resources. The comment letter stated the BLM should designate the Grand Hogback for cultural resource protection and identify additional ACECs to protect cultural resources.

**Response:** The Grand Hogback ACEC is proposed under Alternatives B-Proposed RMP and Alternative C to protect cultural resources. Additionally, the designation of any ACEC will add protection to cultural resources through limiting activities that could impact cultural resources.

## **8.11 WICKIUPS**

**Comment Summary:** One comment stated wickiups are not designated state historic sites and should not use an ACEC designation to protect them.

**Response:** Many sites (including those with wickiup structures) are determined to be eligible or potentially eligible (needs data) to the National Register of Historic Places (NRHP). The criteria for evaluation of sites to the NRHP are done on a case-by-case basis when cultural resources are documented and the significance is determined. Once a site is evaluated as eligible or potentially eligible for the NRHP it is protected by the National Historic Preservation Act under Section 106. Therefore, as long as cultural resources are eligible or potentially eligible for listing on the National or State Register of Historic Places they are protected.

## **9.0 PALEONTOLOGICAL RESOURCES**

There were four comments with issues coded for paleontological resources.

### **9.1 FOSSIL SIGNIFICANCE**

**Comment Summary:** The one and only comment concerning paleontological resources pertained to designating a larger area in the McCoy Fan Delta in order to protect an important paleontological discovery site.

**Response:** Fossil significance is generally determined in cooperation with the State Office and depends on the rarity of the specimen. Generally, this classification includes vertebrates, index fossils, and localized occurrences of rare samples.

## **10.0 VISUAL RESOURCES**

There were 60 comments with issues coded for visual resources.

### **10.1 VISUAL RESOURCE MANAGEMENT CLASS I AND II**

**Comment Summary:** Commenters questioned the identification and changes in acres of Visual Resource Management (VRM) Class I and Class II designations.

**Response:** BLM Instruction Memorandum No. 2000-096 provides clarification on the appropriate VRM class designation for wilderness study areas (WSAs). Recognizing case-by-case exceptions for valid existing rights and grandfathered uses, BLM Instruction Memorandum No. 2000-096 directs that all WSAs be classified as Class I when preparing RMPs that contain WSAs. The new VRM Class I areas are for WSAs. WSAs are not open to fluid mineral leasing, so there would be no impact on fluid mineral development from revising the VRM designations.

VRM Class II areas support management decisions for lands managed for the protection of wilderness characteristics, ACEC, SRMAs and other areas managed to protect resource values. All areas that are proposed as Class II are in the range of alternatives.

## **10.2 MANAGE LANDS FOR THE PROTECTION OF WILDERNESS CHARACTERISTICS AS VISUAL RESOURCE MANAGEMENT CLASS I**

**Comment Summary:** A few commenters wrote that lands with wilderness characteristics should be managed as VRM I because the objective of managing lands for the protection of wilderness characteristics is to protect the wilderness qualities of these areas, of which scenic values are a key component.

**Response:** BLM Instruction Memorandum No. 2000-096 directs that all WSAs be classified as Class I when preparing RMPs that contain WSAs. BLM Instruction Memorandum No. 2000-096 does not apply to lands managed for wilderness characteristics. All lands managed for the protection of wilderness characteristics are managed as VRM Class II unless overlapping designations or resource values require the VRM Class I designation. CRVFO analysis shows that wilderness characteristics are offered the necessary protections with the VRM Class II designations in addition to the proposed management prescriptions (Appendix F) and the other overlapping protections. CRVFO analysis shows that wilderness characteristics are offered the necessary protections with the VRM Class II designations in addition to the other overlapping protections.

## **10.3 MANAGE AREAS OF CRITICAL ENVIRONMENTAL CONCERN AS VISUAL RESOURCE MANAGEMENT CLASS I**

**Comment Summary:** A few commenters felt ACECs designated for the protection of scenic, geologic, or cultural resources should be managed as VRM Class I.

**Response:** All ACECS were evaluated for scenic quality and as appropriate were brought forward as requiring VRM Class I designation.

## **10.4 MANAGE SPECIAL RECREATION MANAGEMENT AREAS AS VISUAL RESOURCE MANAGEMENT CLASS I**

**Comment Summary:** Several commenters requested that SRMAs be managed as Class I

**Comment Response:** CRVFO analysis shows that recreation characteristics and objectives are offered the necessary protections with the VRM Class II designations in addition to the other overlapping protections. Managing SRMAs as Class I is outside the range of Alternatives.

## **10.5 MANAGE VISUAL RESOURCE MANAGEMENT CLASS II AREAS AS RIGHT OF WAY AVOIDANCE AREAS AND CLOSED TO RENEWABLE ENERGY DEVELOPMENT.**

**Comment Summary:** A few letters suggested VRM Class II areas should be ROW avoidance areas and closed to renewable energy development.

**Response:** ROW avoidance/exclusion areas, just like travel designations and VRM designations, are based on resource values being protected and land use plan designations.

The CRVFO, in general, has low wind energy potential, but very good potential for solar energy development. The potential for locating solar facilities on BLM land within the CRVFO and authorizing ROWs for solar resources is affected by site specific criteria including topography, existing transmission lines, existing transportation corridors, a minimum direct solar resource, and land use compatibility. Most VRM

Class II designations are in highly visible locations near urban areas or are located in steeper terrain that would not be conducive to solar energy development.

#### **10.6 MANAGE RIDGELINES AS VISUAL RESOURCE MANAGEMENT CLASS I OR VISUAL RESOURCE MANAGEMENT CLASS II TO PROTECT VIEWSHEDS**

**Comment Summary:** Several comment letters focused on ridgeline protections. The letters suggested that ridgelines should be protected due to the importance expressed by residents regarding viewshed protection.

**Response:** The majority of the Interstate 70 corridor and critical viewsheds in close proximity to urban areas are designated as VRM Class II.

#### **10.7 EXISTING LEASES**

**Comment Summary:** Many comments discussed the application of proposed VRM class designations to existing oil and gas leases.

**Response:** The Draft RMP/Draft EIS evaluated a range of future oil and gas leasing scenarios and resource protections for currently unleased portions of BLM lands. Most of the high-potential area is leased and proposed VRM class designations will be applied to currently unleased portions of BLM. The proposed VRM class designations would not be applied to existing leases because BLM will honor valid and existing rights. While new VRM class designations will not be applied to existing leases, the CRVFO may apply COAs within BLM's regulatory authority where appropriate, feasible, and consistent with valid existing rights.

#### **10.8 NEW SURFACE DISTURBANCE WITHIN VISUAL RESOURCE MANAGEMENT CLASS II AREAS**

**Comment Summary:** A limited number of comments recommended that new surface disturbance should be within existing ROWs or within 200 meters of existing disturbance.

**Response:** The VRM Class II designation does not preclude land use activities, but the level of change allowed to the landscape would be low and the VRM Class II objective would still need to be met with appropriate mitigation. Stipulations applied to the VRM classes do constrain surface-disturbing activities and implementation of BMPs, such as co-locating facilities within existing ROWs would also reduce new surface disturbance.

#### **10.9 VISUAL RESOURCE INVENTORY MAPS**

**Comment Summary:** Commenters did not like that maps showing the visual resource inventory were not included in the Draft RMP/Draft EIS.

**Response:** Visual Resource Inventory Maps are included in the Proposed RMP/Final EIS Appendix A – Base Resource Information including Scenic Quality, Sensitivity Level, Distance Zones, and VRI Classes.

#### **10.10 IMPACTS OF AIR QUALITY ON VISUAL RESOURCES**

**Comment Summary:** Commenters advocated that the RMP should establish a management framework for ensuring that degradation of air quality due to industrial development does not lead to non-conformance with VRM class designations.

**Response:** The Clean Air Act sets limits on the allowable degradation of visibility within the adjacent Class I airsheds. Actual visibility impacts are caused by a variety of industrial sources, mobile sources, biogenic sources, smoke, and meteorological conditions. The management of cumulative visibility impacts at



Colorado's Class I areas and Scenic Views is best achieved through a collaborative effort among agencies that authorize and permit industrial development, agencies that manage air resources and regulate air emission sources, agencies that manage lands where visibility has been identified as an important characteristic for protection, industry, and the public. The BLM, under this RMP, cannot mitigate all of the impacts from all the source categories that contribute to visibility degradation. The appropriate mechanism for doing so is through the state's Regional Haze State Implementation Plan.

#### **10.11 MAPPED VISUAL RESOURCE MANAGEMENT CLASS I DESIGNATED AREAS SHOULD INCLUDE VIEWSHEDS**

**Comment Summary:** Commenters wanted the BLM to include the complete viewshed of the VRM Class I area to be protected rather than limit VRM Class I designation protection to an area boundary.

**Response:** Managing buffers around VRM Class I designated areas is outside the range of alternatives. In a multiple resource management setting VRM objectives are established through special designations and management objectives. Applying VRM class I objectives outside of a special designations could lead to management conflicts.

#### **10.12 OFFSITE IMPACTS TO VISUAL RESOURCES**

**Comment Summary:** A few comment letters suggested that activities off of BLM land can reduce the quality of scenic landscapes.

**Response:** VRM objectives do not apply to non-BLM lands, but visual concerns may be addressed on split estate where federal minerals occur or if it is a connected action. VRM classes shown for non-public lands are an indication of the visual values for those lands, and those values are only protected by landowner discretion.

### **11.0 WILDLAND FIRE MANAGEMENT**

There were 10 comments with issues coded for wildland fire management.

#### **11.1 IMPACTS OF ENERGY AND MINERALS DEVELOPMENT ON WILDLAND FIRE MANAGEMENT**

**Comment Summary:** A couple of commenters discussed the implications of increasing oil and gas development on fire prevention, suppression and firefighting budgets. Generally it was felt that more analysis is needed.

**Response** The narrative in Section 4.2.11, Wildland Fire Management, discusses development of energy resources and their impact on wildland fire management. The narrative analyzes such topics as (1) more fire suppression resources may be required when responding to wildfires, (2) new facilities would be constructed that would need protection, and (3) gas development creates additional hazards to firefighters. The analysis has been updated in the Proposed RMP/Final EIS.

#### **11.2 IMPACTS OF CLOSING ROADS ON WILDFIRE SUPPRESSION**

**Comment Summary:** A few comment letters suggested that closing roads will negatively impact BLM's ability to perform wildfire suppression.

**Response:** Closing routes to public use has a minimal effect on emergency personnel response to wildfires because the routes can still be used by emergency personnel during a wildfire. Additionally the use of aviation (smokejumpers, helitack) resources to deliver firefighters is common practice in the response to wildfires.

### **11.3 MAKE AREAS NEAR THE TOWN OF EAGLE FULL SUPPRESSION**

**Comment Summary:** The letter from the Town of Eagle asked that all fire near the town received full suppression

**Response:** The Draft RMP/Draft EIS did not have a map displaying where fires for resource benefit could and could not be allowed. A map is now included in the Proposed RMP/Final EIS in Appendix A. The map in the Alternative B - Proposed RMP/Final EIS has area adjacent to the Town of Eagle showing full suppression of all wildfires.

### **11.4 FIRES OUTSIDE THE URBAN INTERFACE SHOULD ALL BE ALLOWED TO BURN FOR RESOURCE BENEFIT**

**Comment Summary:** One letter stated that "While we support efforts to control fire close to homes, people, and critical community infrastructure where health and safety are at issue, fire should generally be managed for resource benefits outside the WUI."

**Response:** Much of the BLM land in the CRVFO is not in continuous blocks. The existing checkerboard ownership makes managing fires for resource benefit unfeasible in much of the field office. Additionally other resource concerns (e.g., cultural resources, potential to convert areas to cheat grass, protection of habitat for special status species, and other sensitive resources) often require the need for fire suppression outside the WUI. Maps in Appendix A display where wildland fires are allowed to be managed for resource benefit.

### **11.5 FIRE SUPPRESSION RESOURCES SHOULD PRIORITIZE PROTECTING RESOURCE TO HOMES, PEOPLE, AND CRITICAL COMMUNITY INFRASTRUCTURE AS OPPOSED TO INDUSTRIAL INFRASTRUCTURE IN THE BACKCOUNTRY**

**Comment Summary:** One letter stated that RMP should make homes, people, a community infrastructure a higher priority over industrial infrastructure in the backcountry.

**Response:** First and foremost the BLM fire program protects human life, both of the public and firefighters. When a wildland fire occurs it is vital to determine if there are any risks to human life. Human life threatened during a wildfire could be recreational visitors, homeowners, industry workers, or ranchers. Any human life is treated equally important in priority during a wildfire event. In addition to the Proposed RMP/Final EIS, the BLM develops an implementation-level planning document called the Fire Management Plan (FMP) which is tiered to the RMP. The FMP further defines the prioritization of the fire program and provides the clear goals and strategies for the response to wildfire.

The bulk of BLM lands managed by the CRVFO are within one mile of private lands. Homes and most community infrastructure are located the interspersed private lands. Wildfire response on private lands is the responsibility of the local Fire Protection District/Fire Department and the County Sheriff in the State of Colorado. The BLM often assists in these private land fires as part mutual aid agreements. Protecting homes is not the jurisdictional responsibility of the CRVFO fire program but we often provide resources to the county and fire protection districts to assist with their fires.

### **12.0 LANDS MANAGED FOR THE PROTECTION OF WILDERNESS CHARACTERISTICS**

There were 120 comments with issues coded for LWCs.

## **12.1 DESIGNATION OF WILDERNESS AREAS OR WILDERNESS STUDY AREAS**

**Comment Summary:** Comment letters suggested that the BLM either designate, or not designate, wilderness or WSA areas. Some of the comments were in response to the rescinded wildlands designation controversy which was confused with wilderness or WSA designations.

**Response:** BLM does not have authority to designate wilderness areas. However, BLM can decide to protect wilderness characteristics outside of WSAs through the land use planning process.

## **12.2 MANAGING THE LANDS WITH WILDERNESS CHARACTERISTICS RESOURCE**

**Comment Summary:** Many commenters did not understand BLM's authority and obligation to conduct wilderness characteristics inventories and analyze wilderness characteristics in LUPs. In addition, the recently rescinded wildlands designation controversy led to many commenters' confusion about BLM's authority to make decisions to manage to protect wilderness character.

**Response:** Section 201 of FLPMA identifies policy that the BLM will conduct wilderness characteristics inventories as part of managing the wilderness resource under the BLM's multiple use mission. The BLM Land Use Planning Handbook (H-1601-1) identifies that wilderness characteristics must be analyzed in the land use planning process. BLM lands may be identified as having wilderness characteristics and decisions may be made to protect or preserve wilderness characteristics. The alternatives range from not managing for wilderness characteristics on any BLM lands to protecting all BLM lands assessed to have wilderness characteristics. "LWCs" are not a designation, but rather a resource where BLM can decide to take management actions to protect and preserve wilderness characteristics.

The environmental consequences section (Chapter 4) analyzes the impacts of protecting wilderness characteristics outside of WSAs. The analysis considers both the resources that would be foregone or adversely affected, and the resources that would benefit under each alternative.

## **12.3 WILDERNESS CHARACTERISTICS ASSESSMENT AND INVENTORY**

**Comment Summary:** Several comments asked the BLM to update the inventory and assessment before final decisions were made.

**Response:** The BLM has finalized the lands with wilderness characteristics assessment (Appendix D) in the Proposed RMP/Final EIS after reviewing public comments on the draft assessment in the Draft RMP/Draft EIS. In addition, the BLM has updated the field office-wide inventory which will be available through contacting the field office. Through the RMP planning process, the CRVFO is determining which portions of BLM lands assessed to have wilderness characteristics would be protected with management and setting prescriptions (Appendix F).

## **12.4 LANDS WITH WILDERNESS CHARACTERISTICS SHOULD BE DESIGNATED AS RIGHT OF WAY EXCLUSION AREAS**

**Comment Summary:** A few comments suggested that the BLM designate lands managed to protect wilderness characteristics as ROW exclusion areas instead of ROW avoidance areas.

**Response:** Lands managed to protect wilderness characteristics are designated as ROW avoidance areas and are covered by an NSO stipulation for surface-disturbing activities, which would offer comparable protections as ROW exclusion areas.

**12.5 BUYBACK EXISTING LEASES WITHIN LANDS WITH WILDERNESS CHARACTERISTICS.**

**Comment Summary:** A few comments suggested that BLM buy back existing leases within lands managed to protect wilderness characteristics.

**Response:** Buying back leases is outside the authority of the CRVFO and BLM's land use planning process.

**12.6 AGENCY GUIDANCE REGARDING OUTSTANDING OPPORTUNITIES.**

**Comment Summary:** BLM does not properly interpret agency guidance regarding "outstanding opportunities."

**Response:** Wording will be changed in the Appendix D to clarify that the wilderness characteristics assessment is for outstanding opportunities for solitude or primitive and unconfined types of recreation.

**12.7 SUPPORT OR OPPOSITION FOR SPECIFIC LANDS WITH WILDERNESS CHARACTERISTICS AREAS**

**Comment Summary:** Several commentators wrote in to support managing to protect certain areas for wilderness characteristics, or in opposition to managing to protect certain areas for lands with wilderness characteristics. In their comments, specific concerns about certain areas were raised.

**Response:** Concerns were addressed or discussed through the range of alternatives in Chapter 2 or through Appendix F, Management and Setting Prescriptions for Lands Managed for the Protection of Wilderness Characteristics.

**12.8 TRAVEL MANAGEMENT DESIGNATIONS WITHIN PROPOSED LANDS WITH WILDERNESS CHARACTERISTICS AREAS**

**Comment Summary:** Several comments were focused on the effects of travel management within proposed lands managed to protect wilderness characteristics. Some commenters did not want to see new roads/trails developed in these areas. Other commenters wanted all or specific motorized and mechanized routes closed in these areas. Still others wanted unnecessary routes closed. On the other side, some commenters wanted routes to remain open to motorized use in lands managed for the protection of wilderness characteristics.

**Response:** Alternative C applies an NSO which prohibits surface occupancy and surface-disturbing activities on these lands to protect their wilderness character. The travel management in Alternative C shows most routes as closed to motorized and mechanized travel in lands managed to protect wilderness characteristics. There are exceptions, specifically in Pisgah Mountain, for allowing motorized use on routes to get to campsites and recreation locations. CRVFO can still manage the area to its current character with the route designated as open.

Additional facts:

- (1) Closed 7 months a year.
- (2) Currently no driving off the road is known to be occurring.
- (3) Difficult to close due to the open, low sagebrush country.
- (4) Needed for range management.
- (5) Some routes are included in Jared Polis's Wilderness Bill as designated routes.

Alternative C states that OHV travel in lands managed to protect wilderness characteristics would be designated as either closed or limited to designated routes, because wilderness characteristics would be adversely affected by permitted or inappropriate cross-country travel.

## **12.9 LANDS WITH WILDERNESS CHARACTERISTICS ONLY IN ALTERNATIVE C**

**Comment Summary:** Several comments asked why the BLM only included managing for lands with wilderness characteristics in Alternative C, and not selected some lands managed to protect wilderness characteristics to be under the Alternative B - Proposed RMP/Final EIS.

**Response:** Chapter 2, section 2.6 discusses the rationale for the identification of the preferred alternative and details that the decision to not incorporate a subset of the lands managed to protect wilderness characteristics within the CRVFO into the preferred alternative (Alternative B) reflects a lack of consensus among members of the Resource Advisory Council (RAC) and cooperating agencies regarding which lands managed to protect wilderness characteristics to include. In addition, it states that the analysis in the alternatives regarding lands with wilderness characteristics could support modifications to the preferred alternative that provide for protective management for lands managed for the protection of wilderness characteristics. The BLM will consider public comments on the Draft RMP/EIS and continuing participation by the RAC and cooperating agencies in determining whether to protect wilderness characteristics in the Proposed RMP/Final EIS, and, if so, whether to apply the protections to all or only some of the identified lands managed to protect wilderness characteristics.

## **12.10 LEASING TO FLUID MINERALS WITHIN LANDS WITH WILDERNESS CHARACTERISTICS AREAS**

**Comment Summary:** Several commentators did not want fluid mineral leasing within lands managed to protect wilderness characteristics. However, some commenters did not want an NSO or other special management of lands that would protect wilderness characteristics.

**Response:** Alternative C analyzed closing lands managed for the protection of wilderness characteristics to leasing for fluid minerals. The Draft Lands with Wilderness Characteristics Assessment and Inventory for the Colorado River Valley Field Office does analyze the degree to which other resources or uses are present in lands managed to protect wilderness characteristics, development potential, resource availability, and compatibility with protection. This document also considers manageability, which includes valid existing rights in the area, ongoing uses and resources. The final planning decision will consider both the resources that would be forgone or adversely affected, and the resources that would benefit under each alternative. The decision will document the reasons for the determinations.

## **13.0 CAVE AND KARST RESOURCES**

There were 17 comments with issues coded for cave and karst resources.

### **13.1 MINERAL WITHDRAWAL FOR CAVE RESOURCES**

**Comment Summary:** A couple comments were made recommending that the BLM withdraw known caves from mineral entry.

**Response:** The stipulation CRVFO-NSO-24 prohibits surface occupancy and surface-disturbing activities to the extent (at a minimum this stipulation extends to 5,000 feet below the surface) of known cave and karst resources unless determined not significant. The NSO area encompasses cave openings and portions of the subsurface features and watersheds immediately above the caves. This stipulation on surface-disturbing

activities, use, and occupancy offers the comparable level of protections for cave resources as a withdrawal from mineral entry.

### **13.2 DETERMINING SIGNIFICANCE AND COMPLETING CAVE INVENTORIES**

**Comment Summary:** A couple of commenters suggested that the BLM complete the baseline inventory before final decisions are made to make sure that cave resources are protected.

**Response:** A significant cave on federal lands shall possess one or more of the following features, characteristics, or values: biota; cultural; geologic, mineralogic, or paleontologic; hydrologic; recreational; and educational or scientific.

Nineteen caves are known to exist within the CRVFO planning area. The estimated acres and unexplored passages are unknown at this time. New caves are continuously being reported to CRVFO. The BLM is currently working with CPW and the CCS to inventory cave resources. This information will assist in making cave significance determinations and applying the appropriate protections in the future. The schedule depends on budgetary and workload constraints and is not a Land Use Planning decision level, but an implementation-level decision.

### **13.3 AUTHORITY TO CLOSE CAVES TO HUMAN USE**

**Comment Summary:** A few comments were made suggesting that the BLM retain authority and the ability to close caves to human entry if white-nose syndrome does progress to Colorado.

**Response:** The BLM has the authority for implementing management actions to protect cave and karst resources. BLM may implement a permit program or even close caves to human use if threats warrant. An implementation action for cave and karst resources proposes to implement a permit program as needed to meet management objectives and setting prescriptions.

### **13.4 TRAVEL MANAGEMENT IMPACTS ON CAVE MANAGEMENT**

**Comment Summary:** Several comments were concerned that cave management would negatively impact travel management motorized users.

**Response:** Cave and Karst Resources impact from Travel Management alternatives were analyzed in Chapter 4. Additionally, Travel Management impacts from Cave and Karst Resources alternatives were also analyzed in Chapter 4.

## **14.0 FORESTRY**

There were 13 comments regarding forestry.

### **14.1 SPECIFIC HARVEST PRESCRIPTIONS AND STAND HEALTH**

**Comment Summary:** Several responses focused on the development of specific harvest prescriptions. Additional comments expressed concern about the relationship between stand health and forest management.

**Response:** RMP language concerning the relationship between stand health and forest management prescriptions was clarified in response to several comments. The forestry prescriptions described in several other responses are within the range of the alternatives' goals, objectives, and actions. Specific harvest prescriptions for stands are developed at the implementation level. At that point, they are developed with consideration for the specific management goals of the harvest area. These implementation-level decisions are

analyzed through NEPA at that time. The project-level NEPA analysis ensures other considerations, such as temporary road reclamation and broader ecological goals, are addressed.

## **15.0 LIVESTOCK GRAZING**

There were 99 comments with issues for grazing.

### **15.1 AREAS AVAILABLE FOR LIVESTOCK GRAZING**

**Comment Summary:** A few comment letters discussed livestock grazing impacts.

**Response:** If an evaluation of land health standards identifies an allotment where land health standards cannot be achieved under any level or management of livestock use, then decisions identifying those areas as available for livestock grazing are revisited. Additional allotment-specific information about land health assessments can be made available on request.

### **15.2 VACANT ALLOTMENTS**

**Comment Summary:** Garfield County commented to keep currently vacant allotments open to grazing use.

**Response:** Vacant allotments are primarily vacant because of factors such as lack of forage, have little or no water, lack of access, steep topography, or lack of fencing to control livestock. Based on these circumstances, the allotments are likely not economical to graze.

### **15.3 LIVESTOCK GRAZING IN AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

**Comment Summary:** A comment suggested implementation-level decisions for livestock grazing in ACECs if not meeting land health standards.

**Response:** If grazing is found to be a contributing factor for not achieving the relevant and important values for the ACEC then implementation-level decisions would be analyzed further in subsequent site specific level NEPA.

### **15.4 AREAS AVAILABLE FOR LIVESTOCK GRAZING**

**Comment Summary:** The grazing permittees of the County Line allotment were against closing it and identified potential benefits from grazing and suggested other management such as fencing threatened or endangered plants.

**Response:** The amount of forage produced on an annual basis on the County Line allotment is not sufficient to support an economically beneficial grazing program while maintaining or moving toward achieving land health standards. The presence of threatened and endangered plants is not the only rationale for closing the allotment. It was not meeting land health standards due to the lack of native perennial cool season grasses and the overabundance of cheatgrass.

### **15.5 LIVESTOCK GRAZING CARRYING CAPACITIES**

**Comment Summary:** A comment suggested developing carrying capacities for several resource uses including livestock grazing.

**Response:** Livestock carrying capacities are developed as part of the land use planning process. Future adjustments may be made based on monitoring and land health assessments.

## **15.6 IMPACTS OF OTHER RESOURCE USES ON LIVESTOCK GRAZING**

**Comment Summary:** A few commenters felt the Draft RMP/Draft EIS needed to determine and quantify actual economic losses to livestock operations from oil and gas development.

**Response:** The Draft RMP/Draft EIS and Proposed RMP/Final EIS address potential negative and beneficial impacts of oil and gas development on grazing in Chapter 4. Negative impacts most often are mitigated on a site-specific scale and analyzed in an environmental assessment.

## **15.7 IMPACTS OF RECREATION ON LIVESTOCK GRAZING**

**Comment Summary:** A few comments from ranchers said that recreation use was causing conflicts with livestock grazing management.

**Response:** The travel management portion of the EIS identifies the system of routes and their designation by vehicle type. Areas managed as RMAs are managed for a particular recreational activity(s). No changes in livestock numbers or dates are proposed in the EIS due to achieving recreation objectives. At the implementation-level recreation goals and objectives in RMAs may impact the placement and design of range improvements such as ponds or fences lines.

## **16.0 RECREATION AND VISITOR SERVICES**

There were 1,622 comments with issues coded for recreation and visitor services.

### **16.1 USE OF THE TERM “RECREATION MANAGEMENT AREA”**

**Comment Summary:** Several commenters needed clarification of the term “Recreation Management Area (RMA).”

**Response:** Before 2011, SRMAs were identified where BLM lands were experiencing heavy recreation use or where BLM planned large investments in staff, funding, facilities, or time. All remaining BLM lands were identified as part of a large nonspecific ERMA called the Glenwood Springs ERMA, which was custodially managed. Alternative A in both the Draft RMP/Draft EIS and Proposed RMP/Final EIS propose to continue current (or existing) management. Current management can be found in the Glenwood Springs Resource Management Plan (Revised 1988) and subsequent amendments. The RMP amendments include:

- Oil and Gas Leasing and Development - Final Supplemental EIS (1996)
- Colorado Standards and Guidelines (1997)
- Castle Peak Travel Management Plan (1999)
- Oil and Gas Leasing & Development Final Supplemental EIS (1999)
- Red Hill RMP Amendment (2000)
- Fire Management Plan (2007)
- Roan Plateau Resource Management Plan Amendment (2009)
- Designation of Areas of Critical Environmental Concern for the Roan Plateau (2009)

Five SRMAs (Bull Gulch, Deep Creek, Hack Lake, Thompson Creek, and the Upper Colorado River) were identified in the original Glenwood Springs RMP. The Castle Peak Travel Management Plan amendment added the Bocco Mountain SRMA and the Gypsum Hills SRMA. The Red Hill RMP amendment added the



Red Hill SRMA (near Carbondale). Thus, eight SRMAs are carried forward into Alternative A. All remaining BLM lands not delineated as SRMAs are identified as part of the Glenwood Springs ERMA.

It is important to note that the 1999 Oil & Gas Leasing & Development amendment also used the term “recreation management areas” to describe areas where an NSO stipulation would be applied to protect the nonmotorized recreation opportunities. The stipulation was applied in the following areas: King Mountain, Siloam Springs, Castle Peak, Bull Gulch (the portion of the Bull Gulch WSA not within the Bull Gulch SRMA), Sunlight Peak, Fisher Creek, and the Pisgah Mountain. The stipulation protected the physical recreation setting (naturalness and remoteness) by restricting surface-disturbing and inconsistent activities. The stipulation for these areas did not amend the RMP and establish the lands as SRMAs. However, areas covered by the stipulation are discussed because the recognition of the recreation values is relevant to understanding recreation and other program proposals and analysis.

In 2011, Instruction Memorandum No. 2011-004 revised the 2005 recreation and visitors services planning decision guidance in Appendix C of the BLM’s H-1601-1 *Land Use Planning Handbook*. The guidance was revised to more accurately describe the planning and implementation decisions required during the land use planning process. Instruction Memorandum No. 2011-004 redefined both SRMAs and ERMAs, including their definition, management focus, and requirements.

## **16.2 RMP PLANNING DECISIONS FOR RECREATION AND VISITOR SERVICES**

**Comment Summary:** Several commenters needed clarification of land use planning decisions made in resource management plans.

**Response:** The designation of RMAs is part of the land use planning process. Decisions in land use plans guide future land management actions and subsequent site-specific implementation decisions. These land use plan decisions establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives (management actions and allowable uses).

Land use plan decisions for recreation and visitor services (R&VS) include the following:

- Designation of RMAs (Extensive or Special)
- Establishment of R&VS objectives for each RMA
- Identification of land use plan-level supporting management actions and allowable uses for each RMA.
- Appendix K of the Proposed RMP/Final EIS provides a complete management framework for all proposed RMAs.

## **16.3 GYPSUM HILLS SPECIAL RECREATION MANAGEMENT AREA**

**Comment Summary:** Several comments from the motorized user groups questioned why the Gypsum Hills SRMA was not carried forward in the action alternatives.

**Response:** The Gypsum Hills SRMA was identified as a SRMA in the 1997 Castle Peak Travel Management Plan. The Gypsum Hills SRMA is included in Alternative A, so it is part of the range of alternatives being considered. It was not brought forward into the action alternatives because it has received minimal public interest. In fact, the area has received so little interest that the CRVFO staff never was able to generate enough public involvement to complete a recreation area management plan (implementation plan).

Neither wildlife issues nor WSA designations had anything to do with decision not to carry forward the SRMA designation into Alternatives B, C, and D in the Draft RMP/Draft EIS. Based on the above-mentioned factors and competing resource uses, the CRVFO concluded that it did not meet the 2011 revised rational for designation of SRMA. SRMAs are now defined as administrative units where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance, or distinctiveness, especially as compared with other areas used for recreation.

The area is being considered to be designated as an ERMA in the Final EIS in the Proposed RMP. ERMA's are administrative units that require specific management consideration to address recreation use, demand, or recreation program investments. The Gypsum Hills ERMA's would be managed to support and sustain the principal motorized recreation activities and maintain the associated qualities and conditions of the ERMA. Management of the Gypsum Hills ERMA areas would be commensurate with management of other resources and resource uses.

#### **16.4 MITIGATION OF RECREATION IMPACTS ON FISH AND WILDLIFE**

**Comment Summary:** A handful of commenters stated concerns about the impacts from recreation to fish and wildlife.

**Response:** The impacts of proposed recreation decisions on fish and wildlife can be found in Chapter 4 of both the Draft RMP/Draft EIS and Proposed RMP/Final EIS. Recreation use is managed and directed through decisions made in the RMP revision. R&VS management is emphasized at specific locations through designation of ERMA's and SRMA's. Recreation use is constrained through the application of management action and allowable use decisions to protect other resources, including wildlife. Examples of management action and allowable use decisions being considered to constrain recreation use to protect wildlife and wildlife habitat include travel management area and route designations; winter range closures to motorized and mechanized vehicles; stipulations on surface-disturbing activities, occupancy, and use; and closing areas to human activity and dogs on an area-specific basis during severe winter weather conditions.

#### **16.5 IMPLEMENTATION-LEVEL RECREATION AND VISITOR SERVICES DECISIONS**

**Comment Summary:** Several commenters wanted additional implementation-level decisions included in the RMP.

**Response:** Implementation decisions allow site-specific actions to achieve land use plan decisions. Implementation-level decisions included in this RMP are listed in Appendix K for SRMA's and ERMA's. Subsequent implementation-level decisions that support land use planning objectives can also be made in recreation area management plans or other area specific plans. Implementation decisions for R&VS include these four categories:

- (1) Management. Recreation management actions include commitment of resources, services to be offered to visitors, and the development and provision of facilities (e.g. developed recreation sites, roads and trails, and concessions).
- (2) Administration. Regulatory actions include the implementation of allocation systems, permits, fees, use restrictions, partnership agreements, as well as business plans or fiscal accountability systems, and data management protocols.

(3) Information and Education. Information and education actions include maps or brochures, web sites, outreach efforts, events, interpretation, environmental education, signing, and other visitor information delivery services.

(4) Monitoring. Monitoring of recreation resources and human use includes visitor use and use patterns; recreation-caused resource effects or impacts; visitor satisfaction; and effectiveness or attainment of outcome-focused management objectives, recreation setting characteristics, standards, and indicators.

## **16.6 NONMOTORIZED – NON-MECHANIZED RECREATION ACTIVITY OPPORTUNITIES**

**Comment Summary:** Several commenters wanted more RMA that supported nonmotorized and non-mechanized recreation.

**Response:** Nonmotorized and non-mechanized recreation activity opportunities can be found in other identifications and designations outside the designation of RMAs. WSAs, lands managed to protect wilderness characteristics, and ACECs are areas where nonmotorized and non-mechanized recreation activity opportunities can be consistent with the management objectives for the area. Other types of recreation activities can be prohibited or restricted because they may not be consistent with the non-impairment standard for WSAs, preserving wilderness characteristics, or conflict with ACEC objectives.

## **16.7 OVERLAPPING OTHER DESIGNATIONS WITH RECREATION AND VISITOR SERVICES DESIGNATIONS**

**Comment Summary:** Several commenters wanted additional overlapping designations to further support other special designations.

**Response:** From a management standpoint or a visitor use perspective, it is usually not useful to overlap RMA designations with other program designations (e.g., ACECs and WSAs). Conflicting program objectives and user expectation can create implementation conflicts. For example, ACEC designations highlight significant natural, historic, cultural, or scenic resources or hazards where special management measures are needed to prevent irreparable damage. Recreation user expectations or management needs can be inconsistent with ACEC management prescriptions to protect unique and significant resource values.

In addition, duplicative planning and management guidance does not improve implementation or better protect resources. For example, in WSAs, sufficient guidance to manage the area including recreation use is provided by BLM Manual 6330—*Management of BLM Wilderness Study Areas*. By policy, an RMA designation would support the management and protection of WSAs so as not to impair the suitability of these areas for preservation as wilderness. The result would be a recreation area management plan (implementation plan) that would replicate guidance in BLM Manual 6330.

## **16.8 COOPERATION WITH USER GROUPS**

**Comment Summary:** Comment letters suggested the CRVFO needs to work cooperatively with OHV organizations.

**Response:** The CRVFO works with multiple OHV organizations, including High Country Four Wheelers, White River Trail Runners, and Rocky Mountain Sport Riders, on issues related to OHV use. Motorized recreation representatives participated on the BLM Northwest Colorado Resource Advisory Council Subgroup that provided local knowledge and information to the CRVFO throughout the RMP planning process.

## **16.9 AREAS CLOSED TO MOTORIZED AND MECHANIZED USE**

**Comment Summary:** Several commenters stated closing areas to motorized use discriminates against people with disabilities.

**Response:** Restrictions on motorized and mechanized vehicle use that are applied consistently to everyone are not discriminatory. Vehicle access in closed areas for individuals with mobility impairments is authorized on a case-by-case basis. In compliance with the 1990 Americans with Disabilities Act (ADA), wheelchairs are permitted in areas closed to motorized and mechanized use. The BLM is not required to provide any form of special treatment or accommodation or to construct any facilities or modify any conditions of lands to facilitate such use. The ADA defines a wheelchair as a device designed solely for use by a mobility-impaired person for locomotion that is suitable for use in an indoor pedestrian area.

## **16.10 IMPACT OF BIG GAME WINTER CLOSURES ON LATE SEASON BIG GAME HUNTING**

**Comment Summary:** Several comment letters were concerned that seasonal winter closures will negatively impact late season hunting.

**Response:** Big game winter range closures apply to motorized (Alternative A) and mechanized travel (Alternatives B, C, and D), and not foot and horse travel, except on a case-by-case basis if requested by CPW during severe winters. Hunting on foot and by horse is permitted within areas closed to motorized and mechanized travel.

## **16.11 RECREATION AREA MANAGEMENT PLANS**

**Comment Summary:** Pitkin county and a few others suggested that until such time as a management plan is developed BLM should include an interim management approach to manage specific parcels (i.e., Crown, Light Hill).

**Response:** Recreation management areas with complex implementation issues may require a subsequent plan that addresses implementation-level management, administration, information, and monitoring actions. The plans are referred to as Recreation Area Management Plans (RAMPs).

## **16.12 RECREATION DESIGNATIONS CONFLICT WITH FLUID MINERAL LEASES AND DEVELOPMENT**

**Comment Summary:** Many comments letters were concerned that recreation designations conflict with fluid mineral leases and development.

**Response:** Only the Silt Mesa ERMA overlaps existing fluid mineral leases. The ERMA designation recognizes existing rights of the lease holder. The management of ERMAs is commensurate with management of other resources and resource uses.

## **16.13 CARRYING CAPACITY ANALYSIS FOR SPECIFIC AREAS**

**Comment Summary:** Pitkin County and a few others recommended BLM develop a carrying capacity analysis for specific areas (i.e., Crown, Light Hill and Arbaney/Kittle) to use as a basis for determining to what extent limitations are necessary to maintain a positive user experience.

**Response:** The 2011 revised Appendix C – Recreation and Visitor Services guidance for BLM’s H-1601 – *Land Use Planning Handbook*, does not require BLM to make social carrying capacity decisions in the RMP. Allocation systems, permits, fees, use restrictions, partnership agreements, as well as business plans or fiscal

accountability systems and data management protocols, are identified as implementation-level administrative and regulatory actions.

In a summary of visitor survey results, the Final Report of the Glenwood Springs Planning Area Visitor Study (ASU 2008a) found that visitor survey respondents indicated a slight level of crowding during their visit to their most satisfying recreation zone. This finding, the difficulty of implementing an allocation system, BLM planning guidance, and the very limited public support for recreation allocation system, lead the CRVFO to apply an adaptive management framework to address all recreation setting characteristics.

The Recreation and Visitor Services Management Framework for Special and Extensive Recreation Management Areas (Appendix K) outlines the desired RSCs for the physical, social, and operational recreation setting characters (RSCs). The CRVFO will monitor recreation outcome attainment and preferences through customer assessments (e.g., focus group interviews or visitor studies) on 5-year intervals or as funding allows. The CRVFO will also monitor activity participation and RSCs annually during the primary season of use. If future monitoring indicates that social RSCs are not being achieved, resource damage is occurring, or user conflicts need to be addressed, the CRVFO will have area-specific data to create an allocation system or apply group size limits for private and commercial recreation use tied to a specific RMA.

## **17.0 COMPREHENSIVE TRAILS AND TRAIL MANAGEMENT**

There were 921 comments with issues coded for comprehensive trails and trail management.

### **17.1 DESIGNATION OF OFF-HIGHWAY VEHICLE MANAGEMENT AREAS**

**Comment Summary:** Commenters questioned open, limited or closed OHV designations.

**Response:** All public lands are required to have OHV area designations (see 43 CFR Section 8342.1). Areas must be designated as open, limited, or closed to motorized travel activities. Open, limited, and closed areas are defined in 43 CFR Section 8340.0-5, (f), (g), and (h). Criteria for open, limited, and closed area designations are established in 43 CFR Section 8342.1 (a-d).

**Open Areas.** Existing laws, proclamations, regulations, or Executive Orders may limit the use of the open area designation or impose additional requirements relating to travel and transportation planning and management in specific circumstances. Technological advances in OHVs and the volume of motorized recreation on public lands have required a shift in policy, where the designation or retention of large areas open to unregulated cross-country travel is no longer a viable management strategy.

Open areas will be limited to a size that can be effectively managed and geographically identifiable to offer a quality OHV opportunity for participants. Expansive open areas allowing cross-country travel, without a corresponding and identified user need or demand, will not be designated in RMP revisions or new travel management plans.

**Limited Areas.** At a minimum, a limited area must have specific road, primitive road, and trail designations (limited to designated routes). Consideration must be given to a range of alternatives pursuant to NEPA and to a range of route-specific limitations. These specific road, primitive road, and trail designations are implementation-level decisions. More than one limitation may apply beyond the specific road, primitive road, and trail designations, including travel routes that will be limited to specific types or modes of travel, such as foot, equestrian, bicycle, and motorized; limited to time or season of use; limited to certain types of vehicles

(street-legal vehicles, motorcycles, all-terrain vehicles, over-snow vehicles, and/or high clearance vehicles); limited to authorized or permitted vehicles or users; limited to BLM administrative use only; or other types of limitations (e.g., hunting access, game retrieval, and pull-out camping). The implementation-level decisions also must provide specific guidance about the process for managing motorized vehicle access for authorized, permitted, or otherwise approved vehicles for those specific categories of motorized vehicle uses that are exempt from a limited designation (see 43 CFR Section 8340.0-5(a)(1-5)).

Closed Areas. Motorized vehicle travel is prohibited in a closed area. Access by means other than motorized vehicle, such as mechanized or nonmotorized use, is permitted. Areas are designated closed if closure to all vehicular use is necessary to protect resources, promote visitor safety, or reduce use conflicts.

## **17.2 ROUTES PROPOSED FOR CLOSURE IN ALTERNATIVES B, C, AND D IN THE DRAFT RMP/DRAFT EIS**

**Comment Summary:** Comment letters also questioned why are so many miles of motorized routes closed?

**Response:** In the CRVFO RMP planning area, there are approximately 300 miles of motorized and mechanized routes identified as open that have no legal public access (Alternative A). These routes are proposed for closure to motorized and mechanized use in Alternatives B, C, and D because the private landowner blocks public access and the designation of the route allows for exclusive vehicle access by adjacent private landowners. Because the private land owner blocks public vehicle access, the routes are accessible only to cross-country public foot and horse travel if legally accessed.

## **17.3 LANDING STRIPS**

**Comment Summary:** The majority of the comment letters suggested the BLM needs to designate landing strips and provide the opportunity for use of landing strips through this planning process.

**Response:** Aviation was considered in this planning process. However, there are no designated landing strips within the CRVFO RMP planning area. The Tepee Creek landing strip, which is displayed on some maps, is on private land that has been converted to an agricultural pasture. The landing strip on the Roan Plateau is outside the planning area and is overgrown with vegetation.

Construction of new landing strips is an implementation-level decision. The proposed action alternatives require all motorized aircraft, including, but not limited, to airplanes, helicopters, and ultralights, to have a use authorization for take-off and landing locations on BLM lands or waterways. Emergency landings are permitted without prior approval.

## **17.4 RATIONALE FOR ROUTE DESIGNATIONS**

**Comment Summary:** A few comment letters wanted the Proposed RMP/Final EIS to include rationale for why route designations were implemented.

**Response:** The BLM considered a range of route systems in the Draft RMP/Draft EIS that matched the decisions in each. Appendix O - Table O-2 was developed for the Proposed RMP/Final EIS to document the rationale for route designations for the numbered routes displayed on the travel map for the Alternative B - Proposed RMP. The route designations considered public comments, proposed designations (e.g., ACECs, SRMAs, and ERMAAs), area management emphasis (e.g., lands managed for the protection of wilderness characteristics), resource issues and concerns, public access, as well as valid and existing rights.

## **17.5 NEW ROUTE CONSTRUCTION**

**Comment Summary:** Some of the commenters BLM consider proposals for new route construction in the RMP revision.

**Response:** New route construction and signing are implementation-level decisions not included in the RMP. Estimates of new trail construction are based on: objectives and desired recreation setting characteristics within RMAs as well as constraints from other resources. The estimates provide a basis to help determine the environmental consequences (Chapter 4) of recreation designations. Any construction of new routes, including reroutes, or route closures would be analyzed in an environmental assessment and include stakeholder involvement.

## **17.6 ADMINISTRATIVE USE OF ROUTES**

**Comment Summary:** A few comment letters were concerned that route designations will limit land use activities.

**Response:** Administrative routes offer motorized access to BLM, military personnel, fire personnel, emergency and law enforcement personnel, tribal members, and authorized users of BLM lands. These routes serve an administrative purpose (e.g., monitoring, operation, or maintenance activities). The BLM authorized officer generally grants administrative use authorizations on a case-by-case basis. Authorizations recognize natural and cultural resource concerns and other public land uses.

## **17.7 USE AND USER CONFLICTS**

**Comment Summary:** Some letters expressed the idea that the travel designations focus too much on conflict.

**Response:** “Use and user conflicts” refers to conflicts among different types of recreation users and between different resources. The BLM manages for a variety of resources, a variety of recreation settings and a variety of recreation activities across the field office. Each part of the field office has distinctive resource concerns, resource conflicts and recreational objectives. As a result, travel designations were developed to address these resource issues and also offer a variety of recreational activities.

## **17.8 USER CREATED TRAILS**

**Comment Summary:** Some commenters felt that user created trails should not be included in the RMP.

**Response:** Currently much of the CRVFO has an open designation, so user created trails occurred legally within areas having an open travel designation. Routes not included on the travel maps or that have no documentation of existence prior to the notice of intent for the RMP were not considered for designation. In the RMP revision, the entire CRVFO is designated as either limited (to designated routes) or closed to OHVs. In addition mechanized travel is limited to designated routes. This travel management strategy allows BLM and partners to distinguish and address user created trails in future management.

## **17.9 SEASONAL CLOSURES**

**Comment Summary:** A few commenters wanted BLM to make big game seasonal winter closures apply to all human entry. However many more comment letters opposed closing big game winter habitat or priority wildlife habitat to all human use.

**Response:** Big game seasonal winter closures only apply to mechanized and motorized travel, not pedestrian or horse use. In Alternatives B, C, and D; BLM is proposing to work with CPW to close specific areas to human activity and dogs during severe winter weather conditions as defined by a combination of factors including snow depth, snow crusting, daily mean temperatures (long periods of cold temperatures), and concentrations of animals.

## **18.0 LANDS AND REALTY**

There were 129 comments with issues coded for lands and realty.

### **18.1 LIMITING THE CONVEYANCE OF BLM LANDS TO OTHER PUBLIC AGENCIES**

**Comment Summary:** Pitkin County expressed a concern about the loss of local and state public benefits resulting from the conveyance of BLM lands to private entities through sale or land exchange.

**Response:** Limiting the conveyance of BLM lands to other public agencies would eliminate BLM's ability to acquire lands through exchange. Conducting conveyances only with the support of the local government with "jurisdiction" would likely not provide for actions that are in the broader public interest and would result in BLM's giving up authority to the local government. The Property Clause of the US Constitution Article IV, Section 3 clause.2, gives Congress plenary authority over federally owned lands, and federal agencies must manage these lands as directed by Congress in statutes such as FLPMA. Consequently, where Congress has enacted legislation directing management of federal public lands, the United States has been found to preempt other types of land use regulation under the Supremacy Clause of the US Constitution, Article VI.

### **18.2 CRITERIA FOR LAND DISPOSAL**

**Comment Summary:** Pitkin County felt land exchanges with private entities should result in no net loss of equal quality acreage in the Roaring Fork watershed, or public access for a geographic region or alternatively, no net loss of cumulative public benefit for the citizens of Pitkin County.

**Response:** Adding requirements such as "no net loss of equal quality acreage, public access for a geographic region, or cumulative public benefit" are subjective terms and would conflict with BLM's policy and guidance on considering land tenure adjustments.

### **18.3 LOCAL ZONING OF BLM LANDS INVOLVED IN LAND EXCHANGES**

**Comment Summary:** Pitkin County raised a concern about local land use regulations regarding mineral exploration and development.

**Response:** As a general rule, federally owned property is exempt from enforcement of local zoning ordinances under principles of federal sovereign immunity. Once lands leave public ownership, they should then be zoned consistent with the surrounding private lands. The appraisal of public lands as part of the disposal process contemplates the value based on its highest and best use, and not based on the county's attempt to prevent future development. This approach allows the BLM to receive the highest economic return for disposal of property, which in turn allows for the possible acquisition of a greater value, or acreage, of private land.

### **18.4 DISPOSAL AND ACQUISITION OF MINERAL ESTATE IN LAND EXCHANGES**

**Comment Summary:** Some of the public commented on how mineral estates are treated in land exchanges.



**Response:** BLM Handbook H-2200-1 addresses mineral estate in Chapter 1.G. 4(a)(b):

4a. The disposal and acquisition of mineral estate in exchanges should serve to maintain and improve consolidated ownership of the surface and the mineral estate of federal land.

FLPMA and the land exchange regulations do not require the reservation of federal mineral interest in land exchange transactions. The mineral report prepared for a proposed land exchange is advisory in nature only and the authorized officer should consider the benefits of including the mineral estate value in the land exchange transaction. The appraisal report determines the contributing value of the mineral estate. Proposals that would either create split estate, including reservation of minerals in the federal land proposed for disposal, or fail to take advantage of consolidation opportunities should be discouraged. The surface estate is subservient to the mineral estate, and unless the mineral rights attached to a property have been subordinated, mineral development will take precedence over surface uses and could cause significant conflicts.

4b. Mineral rights proposed to be conveyed or reserved in exchange proposals must be carefully considered at the early stages of feasibility analysis. The authorized officer must carefully evaluate the need for the non-federal land being considered for acquisition, uses contemplated and potential conflicts or risks when making a determination concerning the mineral estate. This evaluation is especially important in situations where the non-federal lands are subject to a third-party mineral interest.

## **18.5 IDENTIFYING ACCESS NEEDS IN LAND EXCHANGES**

**Comment Summary:** Pitkin County, Town of Basalt and some members of the public suggest the BLM should use land exchanges to leverage public access over private property.

**Response:** The BLM is responsible for completing the feasibility report for proposed land exchanges. The content of feasibility reports illustrates the significant effort needed to effectively evaluate and analyze all aspects of the land exchange process at this preliminary stage. As part of that feasibility report, BLM identifies if access is available to the non-federal property, or if additional acquisition or road construction will be necessary to provide for administrative or public use of the property (BLM Handbook H-2200-1- Section E.4).

## **18.6 REVIEW OF ENERGY-RELATED RIGHT OF WAY PROJECTS**

**Comment Summary:** One letter recommends the BLM should make as little land as possible available to oil and gas activities to limit our dependence on fossil fuels

**Response:** The National Energy Policy and EO 13212, dated May 18, 2001, provides direction to federal agencies to take appropriate actions to expedite the review of energy-related ROW projects, support renewable energy development on federal lands (including wind energy), and improve efficiencies in processing ROW applications. The US Department of Energy and BLM have identified a series of actions to streamline and improve the ROW siting and application process on public lands. These action items include implementing new ROW cost recovery regulations; initiating a coordinated inter-government, inter-agency ROW corridor planning effort in partnership with industry and public interest groups; expanding the existing BLM ROW Project Manager pilot project for processing of major ROW applications; providing direction on

establishing priorities for the processing of energy related ROW applications; and preparing a Wind Energy Programmatic EIS to support processing wind energy ROW applications.

## **18.7 RENEWABLE ENERGY**

**Comment Summary:** One letter recommended the EIS explicitly address appropriate and inappropriate areas for renewable energy development. Some areas should be closed to wind and solar projects but do not necessarily need to be excluded from all ROWs.

**Response:** The Final Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development in Six Southwestern States ROD was signed in October (2012) and amended all RMPs in Colorado. The CRVFO was excluded from utility-scale (20MW or greater) solar development. Any application for solar development under 20 MWs would be processed like any other ROW application, subject to the current RMP and not the Solar PEIS.

The most recent National Renewable Energy Laboratory wind mapping includes 50/80/100 meter wind data. Areas of high wind potential could be identified as a wind development area in the RMP revision and could be tied to the future competitive leasing regulations that are now being drafted, but, the mapping indicates the CRVFO has a low wind development potential.

## **18.8 MINERAL WITHDRAWAL**

**Comment Summary:** A few commenters wanted to see the Proposed RMP/Final EIS recommend areas (e.g., ACECs, WSAs) for withdrawal from location under mining laws.

**Response:** In each alternative the BLM does include areas the CRVFO would petition for withdrawal from locatable exploration or development. Those areas are in Chapter 2 Table 2-2 under the lands and realty section

WSAs were included in the list of areas to be petitioned for withdrawal from locatable exploration or development in the Draft RMP/Draft EIS but removed from the Proposed RMP/Final EIS because of guidance found in BLM Manual 6330 – *Management of BLM Wilderness Study Areas* which addresses lands and realty actions within WSAs. It states “ Unless a WSA or portion of a WSA was “previously withdrawn from appropriation under the mining laws, such lands shall continue to be subject to such appropriation during the period of review unless withdrawn by the Secretary under the procedures of section 204 of...[FLPMA]...for reasons other than preservation of their wilderness character.” Existing withdrawals may be renewed if the withdrawal is still serving its purpose. No new withdrawals may be made except withdrawals that can satisfy the non-impairment criteria.”

## **18.9 RIGHT OF WAY AVOIDANCE AND EXCLUSION AREAS**

**Comment Summary:** Public Lands Advocacy and Western Area Power Administration suggest the BLM needs better justification for ROW avoidance and exclusion areas.

**Response:** Federal Land Policy and Management Act of 1976 (FLPMA), as amended, 43 USC 1701 et seq., provides the authority for the BLM land use planning; Section 201 (Title 43 CFR Part 1610 ACEC). The criteria of relevance and importance must first be met in order to nominate lands for ACEC status. Existing ROWs and other uses will be considered and mitigation can be considered when the public has a significant interest (i.e., power transmission, etc.).

## **19.0 MINERALS INCLUDING FLUID MINERALS LEASING AND MANAGEMENT**

There were 1,961 comments with issues coded for minerals. The majority of those comments were related to fluid and leasable minerals and not locatable or salable minerals.

### **19.1 REASONABLY FORESEEABLE DEVELOPMENT FOR FLUID MINERALS**

**Comment Summary:** Comments concerning the RFD related to issues such as the Draft RMP/Draft EIS fails to take into account the reasonably foreseeable oil and gas development in the CRVFO, the Roan Plateau area, and other adjacent field offices, along with emerging new oil and gas plays, undermine the analysis.

**Response:** The RFD and the planning process of which it is part are not intended to define the specific numbers and locations of wells and pads needed to develop oil and gas resources. Instead, they are intended to allow flexibility during resource development while providing sufficient specificity to support the impact analysis and alternative selection process. The actual level of oil and gas development associated with any specific alternative is likely to differ substantially from the RFD as a result of the alternative-specific measures aimed at protection and management of other uses and resources. Furthermore, the RFD is not intended to be used as a leasable mineral cap, and therefore does not limit or preclude practical future mineral plays; instead, it is an analytical tool used to predict potential energy development. Therefore, the actual number of drill rigs active at any one time, the number of wells and pads constructed during 20 years, the resultant acres of surface disturbance, and the miles of new or upgraded access roads under any of the alternatives may differ from the assumed numbers based on factors subject to change through time, such as natural gas prices, technological advances, or new requirements related to other land uses and resource management goals.

The RFD was prepared in accordance with Instruction Memorandum (IM) No. 2004-089; subject “Policy for Reasonable Foreseeable Development (RFD) Scenario for Oil and Gas,” dated January 16, 2004. Its baseline assumption is that all potentially productive areas are open to development under standard lease terms, except those areas closed to leasing under law, regulation, or executive order. Five Total Petroleum Systems and 20 Assessment Units extend into the Piceance Basin, which were used to determine the areas of greatest potential for oil and gas occurrence. Additionally, unconventional plays were also analyzed and considered as possible candidates for leasing and development, including the Niobrara, Mancos Formation, and the Eagle Basin. The development potential for the CRVFO resource area is determined by analyzing occurrence potential cross-referenced with leasing information.

Additionally, the RFD scenario was developed with information provided by energy companies operating within the CRVFO resource area. Most of the data provided addressed development scenarios based on current mainstream technology. Data related to potential horizontal gas plays within the Niobrara and Mancos formations have been mostly proprietary within the oil and gas community. In addition, the potential development in relation to horizontal gas plays is still in the exploratory stage. In light of the speculative nature of these plays in terms of development intensity, timing, and location, they could not be quantitatively analyzed. Moreover, any development of Mancos or Niobrara wells would be applied against the assumed well numbers in the RMP. To date, operators indicate that these deeper shale plays may reduce the number of future Mesa Verde wells. If and when total well numbers approach those analyzed in the RMP, the CRVFO would evaluate the need for supplemental analysis. The CRVFO processed on average 300 APDs per year over the last 3 years. This number coincides with the energy development predicted within the RFD model. Furthermore, comments from EnCana agree with the adequacy of the RFD, but disagree with the language used within the RMP to describe its use as an analysis tool. EnCana asserts that the current RMP language

suggests the RFD potentially caps energy development. These comments, coupled with actual development data, reinforce the validity of the RFD as acceptable analytical tool.

## **19.2 SUPPORT/OPPOSE DRILLING**

**Comment Summary:** The majority of the comments related to oil and gas development were statements either opposing or supporting development of fluid minerals. Due to the general nature of these comments the following response was applied.

**Response:** The BLM received a large amount of support for both protecting public lands from oil and gas development and allowing production of as much of the underlying federal fluid mineral resources as practicable. Range of alternatives includes current development with 2,206 wells developed with 2,774 acres of surface disturbance to 4,198 wells developed on 5,276 acres. In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments resulting from the public review process as well as the extensive input of public and private stakeholders who participated in the planning process for the RMP revision.

## **19.3 THOMPSON DIVIDE**

**Comment Summary:** The comments addressing the Thompson Divide area were either requests for the BLM to remove the Divide from development, or for the BLM to open more of the area to development.

**Response:** The BLM received a large amount of support for protecting currently leased and unleased portions of the Thompson Divide area from oil and gas development. The BLM also received considerable support for allowing as much production of federal fluid mineral resources underlying those lands as practicable. The Draft RMP/Draft EIS evaluated a range of future oil and gas leasing scenarios for currently unleased portions of BLM lands within the Thompson Divide area, ranging from closing all unleased areas to making those lands available for leasing. In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments resulting from the public review process, as well as the extensive input of public and private stakeholders who participated in the planning process for the RMP revision.

The RMP is used to make land use plan decisions. Specific actions regarding the Thompson Divide area, including use or cancellation of existing leases, and decisions affecting the suspension or expiration of those leases are outside the scope of the RMP. Creating or approving federal units requires a formal analysis on the merits by the BLM Colorado State Office, which is the entity responsible for making such a determination. Furthermore, it is important to note that decisions related to the leasing and development of federal fluid minerals underlying National Forest System lands are the purview of that agency, although BLM is responsible for the sale of these leases if recommended by the USFS.

## **19.4 FUTURE LEASING**

**Comment Summary:** Comments focused on concerns of development within the high potential areas where stipulations reduced access to future leasing; as well as concerns related to increased development in areas of medium, low and no known potential.

**Response:** The Draft RMP/Draft EIS evaluated a range of future oil and gas leasing scenarios for currently unleased portions of BLM lands within the field office, ranging from closing a majority of unleased areas to making those lands available for leasing. As presented in Chapter 3.3.6 of the Draft RMP/Draft EIS, 88 percent of the high-potential area is leased. In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments resulting from the public review process as well as the

extensive input of public and private stakeholders who participated in the planning process for the RMP revision.

### **19.5 IMPLEMENTATION-LEVEL ACTIONS AND BEST MANAGEMENT PRACTICES**

**Comment Summary:** Comments focused on the need for BMPs, as well as BMPs already in place and in use by industry.

**Response:** By establishing protective measures at the leasing stage, the BLM's intent is to protect resources while allowing development. Individual mitigation measures are developed when site-specific implementation-level decisions are made at the time of permitting. Application of any proposed site-specific requirements are outside the scope of the RMP planning process.

Although analyzing and requiring implementation-level mitigations are outside the scope of this process, examples of currently available BMPs are included in the appendices of the Proposed RMP/Final EIS. BMPs are a snapshot in time of the best available techniques to reduce and mitigate possible environmental impacts of development. Since BMPs are site-specific recommendations and are constantly changing, the list in the Proposed RMP/Final EIS is neither exhaustive nor required across the board. Specific BMPs are applied to development on an individual basis through cooperative planning efforts with the lessee and COAs.

### **19.6 GROUNDWATER**

**Comment Summary:** Ground water concerns were composed of a comment concerning protection of the Rifle Creek fish hatchery from development, and general statements about contamination of alluvial aquifers from drilling mediums.

**Response:** Impacts to water resources including groundwater were analyzed for the proposed action in Section 4.2.4 of the Proposed RMP/Final EIS and for all alternatives in Section 4.2.4 of the Draft RMP/Draft EIS. The conclusions reached in those documents are based on the much greater depth of hydrocarbon-bearing strata compared with groundwater aquifers that have the potential to affect surface water resources or be used as domestic freshwater sources. The protective measures required of oil and gas drilling operations are designed to isolate water-bearing zones from the well bore. In arriving at a Proposed RMP and preparing a Final EIS, the BLM has considered all substantive comments and recommendations related to groundwater protection and monitoring.

### **19.7 BONDING**

**Comment Summary:** What mitigations are in place to offset the possibility of damage to public lands by operators who abandon their operations.

**Response:** The RMP is a land use planning tool, and issues related to bond requirements are outside the scope of the RMP. The regulations in 43 CFR 3104 and 3106 require that the oil and gas lessee, operating rights owner, or operator provide bond coverage prior to surface-disturbing activities and to maintain adequate bond coverage during the operational period of a lease. BLM requires bond coverage before APDs will be approved and retains the bonds until all liability has been released, the wells have been correctly plugged and abandoned, and the surface conditions are approved by the BLM. Other agencies and local governments may also require oil and gas operators to retain bonds.

In addition to bonding, BLM conducts inspections on leases and uses timely mechanisms to ensure environmental protection during oil and gas operations. For example, an operator is not allowed to complete

and produce a well (produce saleable gas) until the well bore integrity, including cementing and casing, meets engineering specifications and passes BLM inspection.

### **19.8 ENFORCEMENT**

**Comment Summary:** Overall, these comments addressed inspection and enforcement of wells and facilities on federal lands.

**Response:** Inspection and enforcement activities on public land leased for energy exploration and development are outside the scope of land use planning and are codified in regulatory laws and orders. These regulations and orders include, but are not limited to FOGPMA, 43 CFR Part 3160, The 1872 Mining Act, Onshore Orders for Oil & Gas Operations, Notice to Lessees, and specific COAs. These regulations grant enforcement and inspection officials the authority to conduct regulatory inspections, environmental compliance inspections, and production audits. It also gives them the authority to issue citations, fines, and Written Orders of the Authorized Officer, and, in specific circumstances, cessation of operations.

### **19.9 APPLICATION OF NEW STIPULATIONS ON EXISTING LEASES**

**Comment Summary:** There were many concerns about the application of new stipulations on existing leases.

**Response:** The Draft RMP/Draft EIS evaluated a range of future oil and gas leasing scenarios and stipulations for currently unleased portions of BLM lands. Most of the high-potential area is leased and proposed stipulations will be applied to currently unleased portions of BLM. The proposed stipulations would not be applied to existing leases because BLM will honor valid and existing rights. While new stipulations will not be applied to existing leases, the CRVFO may apply COAs within BLM's regulatory authority where appropriate, feasible, and consistent with valid existing rights.

### **19.10 APPLICATION OF CONDITIONS OF APPROVAL TO EXISTING LEASES**

**Comment Summary:** There were comments relating to how the BLM determines site specific COAs and what authority the CRVFO has in their application.

**Response:** When making a decision regarding discrete surface-disturbing activities following site-specific environmental review, BLM has the authority to impose reasonable measures to minimize impacts on other resource values, including restricting the siting or timing of lease activities (43 CFR 3100; 43 CFR 3160; IBLA 2006-213, 2006-226; IBLA 2008-197, 2008-200). Site-specific mitigation measures supported by NEPA analysis are added during the implementation phase as conditions of approvals to the project.

### **19.11 STANDARD OPERATING PROCEDURES AND COMPLIANCE**

**Comment Summary:** Commenters were concerned how the BLM ensured compliance of SOPs and regulations.

**Response:** The BLM currently employs multiple surface and drilling compliance standards, the majority of which are identified in the Code of Federal Regulations and Onshore Orders for Oil & Gas Operations. Any unique concerns not specifically addressed with the standards are analyzed and regulated through Written Orders of the Authorized Officer, Notices to Lessees, and site-specific conditions of approval. Enforcement of standards, Written Orders, and COAs is granted by 43 CFR 3162.1.

**19.12 NO LEASING ALTERNATIVE.**

**Comment Summary:** A few commenters questioned whether BLM must consider a no leasing alternative.

**Response:** Because most of the high potential gas area is mostly leased (88%), the majority of future leasing would take place in lands adjacent to existing leases. Currently there is no interest in leasing in areas outside high potential areas

**19.13 PHASING LEASING AND/OR DEVELOPMENT.**

**Comment Summary:** Comment letters also stated the BLM must consider an alternative phasing leasing and/or development.

**Response:** Phased development is dependent upon the area under consideration. Master Development Plans (MDPs) and Geographic Area Plans (GAPs) are used to determine the most efficient and protective scenario at the implementation-level. Phased development is already considered as an alternative in this process.

**19.14 LOCATABLE MINERAL WITHDRAWALS.**

**Comment Summary:** General comments either for, or against, the proposed withdrawals of locatable minerals across alternatives.

**Response:** The Draft RMP/Draft EIS evaluated a range of solid mineral management scenarios and stipulations, to provide for mineral development as well as protect other resources. The intent of locatable mineral withdrawal is to protect ACECs, WSRs, lands managed to protect wilderness characteristics, or WSAs, and in some alternatives, the Upper Colorado River Special Recreation Management Area.

**20.0 RENEWABLE ENERGY**

There were 64 comments with issues coded for renewable energy.

**20.1 RENEWABLE ENERGY DEVELOPMENT**

**Comment Summary:** Comment letters expressed concern about renewable energy development including the scale of development and the potential locations of development.

**Response:** The CRVFO has designated areas where it would be inappropriate for utility development by identifying ROW exclusion areas. The CRVFO has also identified ROW avoidance areas where land use authorizations such as ROW grants would be avoided to the extent possible as a result of some sensitive resource value that may be damaged or diminished if development were allowed.

As per the Solar Programmatic EIS ROD, all BLM lands in the CRVFO would be excluded from utility-scale solar development (20MW or greater). Any application for solar development under 20MWs would be processed subject to the CRVFO RMP, and would not be subject to the requirements within the Solar Programmatic EIS ROD.

Wind energy development could occur in acceptable areas in accordance with current policy and when consistent with the CRVFO RMP.

## 21.0 AREAS OF CRITICAL ENVIRONMENTAL CONCERN

There were 156 comments with issues coded for areas of critical environmental concern.

### 21.1 DESIGNATION OF AREAS OF CRITICAL ENVIRONMENTAL CONCERN TO PROTECT RELEVANT AND IMPORTANT VALUES OR HAZARDS

**Comment Summary:** Some comment letters discussed whether the BLM should or should not designate ACECs to protect the relevant and important values (e.g., greater sage-grouse) or hazards.

**Response:** Congress mandated the designation of ACECs through FLPMA to manage areas containing truly unique and significant resource values. ACEC designations highlight significant resources or hazards where special management measures are needed to prevent irreparable damage. The ACEC designation enables land managers to specifically address the relevant and important value or hazard.

The BLM prescribes special management measures that are specific to the values for which the ACEC is designated. BLM's H-1601-1 – *Land Use Planning Handbook* states that Field Offices should designate ACECs and identify goals, standards, and objectives for each area, as well as general management practices and uses, including necessary constraints and mitigation measures (also see BLM Manual 1613). This direction should be specific enough to minimize the need for subsequent ACEC management plans. Not all ACEC values need the same level of protections. Most ACECs are covered by NSO stipulations to protect the relevant and important value or hazard from inappropriate surface-disturbing activities, use or occupancy.

### 21.2 AREAS OF CRITICAL ENVIRONMENTAL CONCERN FOR THE PROTECTION OF *PENSTEMON HARRINGTONII*.

**Comment Summary:** Several commenters did not think designating ACECs for the protection of *Penstemon harringtonii* was warranted.

**Response:** *Penstemon harringtonii* is a narrowly endemic species, restricted to sagebrush habitat between 6,400 and 9,400 feet elevation in an approximately 82- by 48-mile area within the Colorado River drainage (Panjabi and Anderson 2006). Although a few occurrences are on USFS lands, most are on BLM lands within the CRVFO, or on private lands.

The Colorado Natural Heritage Program (CNHP), which maintains a statewide database on rare plants, considers *Penstemon harringtonii* a “vulnerable” species with a G3/S3 ranking. The G3 ranking means the species is vulnerable throughout its range or is found locally in a restricted range (21 to 100 occurrences). CNHP’s “Element Global Rank Report” documents 74 occurrences for *P. harringtonii* across its range.

*P. harringtonii* occurs in areas of expanding urban and recreational area development and in areas of extensive oil and gas development. Of the 74 occurrences identified in the 2006 *P. harringtonii* Conservation Assessment, at least 10 of these have been affected by residential development and associated roads and powerlines (Panjabi and Anderson 2006). Of the estimated 20,160 acres of potential *P. harringtonii* habitat, approximately 1,800 acres are currently leased for oil and gas development. In the area near Rifle, CO, south of Interstate 70, recent and planned oil and gas development will result in a total mortality of approximately 50,600 *P. harringtonii* plants on BLM land in the CRVFO by the end of 2013. Although occurrences on private lands are poorly documented, an additional estimated 21,482 *P. harringtonii* plants have been or will be destroyed on private lands in conjunction with oil and gas development in past and currently planned projects (CRVFO data). Additional plants have been lost due to right-of-way developments and construction of range improvements. Because of the restricted habitat for this species, and because of the past and ongoing



development impacting this species, protecting some of the core or highest-quality habitat under ACEC designation, as defined by FLPMA (1976), is appropriate. Management prescriptions for these ACECs include an NSO stipulation with a 200-meter buffer to protect occupied and adjacent suitable habitat, while allowing some development in unsuitable habitat within the ACEC.

### **21.3 AREAS OF CRITICAL ENVIRONMENTAL CONCERN DESIGNATION RESTRICTS OIL AND GAS DEVELOPMENT**

**Comment Summary:** Some commenters suggested that BLM does not have the authority to designate ACECs in areas with existing oil and gas leases. Comments from Encana, WPX Energy, and others were opposed to designating ACECs because ACEC management would restrict oil and gas development. In particular, the Greater Sage-grouse ACEC would impact multiple uses and the “existing sage-grouse plan” is adequate to protect this species.

**Response:** Given the legal mandate to conserve threatened or endangered species and BLM’s policy to conserve all special status species, land use planning decisions and management actions should result in a reasonable conservation strategy for these species (BLM 2005, H-1601-1). In addition, the Federal Land Policy and Management Act (FLPMA) provides for ACEC designation and established national policy for the protection of public land areas of critical environmental concern. Section 202(c)(3) of FLPMA mandates the agency to give priority to the designation and protection of ACECs in the development and revision of land use plans.

Only the proposed Mount Logan Foothills and the Grand Hogback ACECs occur in areas of high potential for oil and gas resources and have existing leases. New stipulations and management actions developed for protection of ACEC values cannot substantially infringe on valid existing rights. While new stipulations would not be applied to existing leases, the CRVFO may apply COAs within BLM’s regulatory authority where substantiated by NEPA analysis. The Mount Logan Foothills ACEC is designated primarily to protect habitat for listed plant species. BLM must consult with the USFWS on any action which may affect listed species and would implement reasonable conservation measures resulting from the consultation process.

All other existing and proposed ACECs, including the proposed Sage-grouse Habitat ACEC, are in areas deemed to have low or medium potential for oil and gas development and have no existing leases. Designation of these ACECs would have minimal impact on development of oil and gas resources since less than 5% of future development is expected to occur outside of high potential oil and gas areas.

### **21.4 OIL AND GAS DEVELOPMENT SHOULD BE BANNED IN ALL AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

**Comment Summary:** Wilderness Workshop and many other comments were received that recommended banning oil and gas development in all ACECs, lands managed to protect wilderness characteristics, and wildlife core habitats. Some also advocated closing ACECs to all motorized and mechanized use.

**Response:** Only two of the ACECs (Mount Logan Foothills and the Grand Hogback ACEC) occur in areas mapped as having high potential for oil and gas development. Some leases have already been issued in these areas so BLM may not ban development of these leases. Even though the potential for oil and gas development is low, some other ACECs with resources that are highly vulnerable to adverse change would be closed to oil and gas leasing. This includes: Blue Hill, Bull Gulch, Deep Creek, and Thompson Creek ACECs. All other ACECs except the Hardscrabble-East Eagle, Lyons Gulch and Sheep Creek Uplands would have an NSO stipulation applied to the entire ACEC which would restrict any surface-disturbing activities that might

impact the relevant and important values. The relevant and important values within the Hardscrabble-East Eagle, Lyons Gulch and Sheep Creek Uplands ACECs are high-density, good quality occurrences of the BLM sensitive plant species, Harrington's penstemon. A 200-meter buffer around known populations would provide substantial protection of occupied and adjacent suitable habitats. Each of these three ACECs incorporates some acreage that is not considered suitable habitat. Limited surface-disturbing activities (including oil and gas development) could be permitted in these areas of unsuitable habitat without adversely impacting the sensitive plant habitat.

## **21.5 MCCOY FAN DELTA AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

**Comment Summary:** A professor of paleontology commented that the boundary of the McCoy Fan Delta as shown in the Draft RMP/Draft EIS does not encompass many of the scientifically significant paleontological resources in the McCoy area and recommended that the boundary be adjusted to include these resources. Limitations should be placed on OHV trails in the area that are impacting paleontological resources. CPW also favored protecting the unique geologic and paleontological values in the area and stated that this area may be considered for future designation as a State Natural Area.

**Response:** The proposed McCoy Fan Delta ACEC boundary was reconfigured to incorporate the significant paleontological resources on public lands in the vicinity. Travel management within the ACEC will allow no net increase in miles of routes beyond the baseline of designated routes in the Proposed RMP/Final EIS. If routes must be closed to protect ACEC values, similar route mileage will be accommodated contiguous to the existing motorcycle trail network but outside of the ACEC.

## **21.6. HARDCRABBLE-EAST EAGLE AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

**Comment Summary:** Eagle County commissioners, the Town of Eagle and other comments favored designation of the Hardscrabble-East Eagle ACEC to protect special status plants, but several commenters expressed concern that ACEC designation would prevent expansion of mountain biking trails.

**Response:** The boundaries of both the Hardscrabble and East Eagle units of this ACEC were modified to reduce the overlap with the proposed Hardscrabble-East Eagle SRMA which would be managed to enhance nonmotorized recreation opportunities. Construction of a myriad of new trails within the ACEC would substantially fragment the habitat for special status plants. Within the ACEC, miles of routes will not increase beyond the baseline of designated routes. If routes must be closed to protect special status plant habitat or due to erosion concerns, similar route mileage may be accommodated outside of the ACEC or outside of suitable habitat within the ACEC.

## **21.7 MOUNT LOGAN FOOTHILLS AREAS OF CRITICAL ENVIRONMENTAL CONCERN**

**Comment Summary:** The USFWS and CPW recommended expanding the Mount Logan Foothills ACEC boundary to include the critical habitat unit for Parachute penstemon that was designated in 2012. The Final Plan should also apply an NSO stipulation to the entire ACEC to protect suitable, but currently unoccupied, habitat or suitable habitat which has not yet been surveyed.

**Response:** Most of the Mount Logan Foothills area is already leased for oil and gas, including much of the Parachute penstemon critical habitat unit. As such, application of any NSO stipulations would have to be consistent with lease rights. An NSO stipulation will be applied to the entire ACEC to protect currently unleased parcels that contain suitable habitat for listed or sensitive plants. For the listed plants in the ACEC, any BLM-approved management action would first undergo Section 7 consultation with USFWS to further the purposes of the ESA. For the most part, COAs would be used to provide necessary mitigation for oil and

gas-related actions. For non-oil and gas actions, the NSO will protect the plants, their occupied and historic habitat, and habitat for their pollinators.

## **21.8 AREAS OF CRITICAL ENVIRONMENTAL CONCERN BOUNDARIES**

**Comment Summary:** Several comments recommended that, for management purposes, the ACEC boundaries should follow natural features such as watersheds or vegetation types or anthropogenic features such as roads that are readily recognizable on the ground. Where natural features are not available, ACEC boundaries should follow section lines or public land boundaries.

**Response:** Boundaries of several ACECs (including Deep Creek, Sheep Creek Uplands, and Thompson Creek) were modified to align with recognizable features or survey lines.

## **21.9 OVERLAPPING DESIGNATIONS ARE REDUNDANT**

**Comment Summary:** Some commenters noted that several ACECs overlap with WSAs and lands managed to protect wilderness characteristics, including Bull Gulch, Deep Creek, and Thompson Creek. Commenters believe that ACEC designation is being used inappropriately as a substitute for lands managed for the protection of wilderness characteristics and WSA designation.

**Response:** ACECs are designated to protect relevant and important values (such as wildlife, botanical, scenic, geologic, and cultural resources). They are not designated to protect "lands with wilderness characteristics" or "opportunities for primitive and unconfined recreation". However, areas of critical environmental concern are often areas with intact natural or cultural resources and little evidence of human disturbance, which is why these designations sometimes overlap. The fact that some ACECs overlap lands managed to protect wilderness characteristics or WSAs is evidence that both designations are needed to manage for different values.

## **22.0 WILDERNESS AND WILDERNESS STUDY AREAS**

There were 96 comments with issues coded for wilderness and wilderness study areas.

### **22.1 REQUIREMENTS UNDER FLPMA**

**Comment Summary:** A few comment letters stated the BLM has a duty to identify, protect, and monitor natural resources under FLPMA.

**Response:** The BLM follows the monitoring set forth in the *Interim Management Policy and Guidelines for Lands under Wilderness Review* (Manual 8550 and Handbook H-8550-1). Most recently, the BLM will follow the updated BLM Manual 6330 for monitoring. Page 25 of the handbook describes that all WSAs are to be monitored on a minimum standard: A basic monitoring level of at least once per month during the months the area is accessible by the public should be adhered to, or more frequently if necessary because of potential use activities or resource conflicts. This guidance will continue to be followed for monitoring WSAs.

### **22.2 TRAVEL MANAGEMENT IN WILDERNESS STUDY AREAS**

**Comment Summary:** A couple of comment letters wanted the Proposed RMP/Final EIS to clarify travel management for WSAs.

**Response:** According to BLM's H-1601-1-*Land Use Planning Handbook*, the travel management area designation for WSAs must be limited to ways and trails existing at the time the area became a WSA. Existing ways were found in the Castle Peak and Bull Gulch WSAs when they were designated as WSAs, but the

existing ways were closed to motorized and mechanized use in the 1984 Glenwood Springs RMP and reaffirmed in the subsequent Castle Peak Travel Management Plan in 1997. Existing ways at the time of WSA designation were not found in the Hack Lake and Eagle Mountain WSAs.

Travel management designation make exceptions for emergency and other purposes, as authorized under 43 CFR 8340.0-5: Any...fire...vehicle while being used for emergency purposes, any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved, vehicles in official use. In addition, the BLM may authorize for administrative use, including habitat treatments.

### **22.3 DESIGNATING NEW WILDERNESS OR WILDERNESS STUDY AREAS**

**Comment Summary:** Some comment letters stated the BLM should consider designating new wilderness or Wilderness Study Areas.

**Response:** The BLM does not have authority to designate wilderness; however, in our planning we can choose to protect lands with wilderness characteristics. See lands with wilderness characteristics sections. Chapter 2 explains the rationale of why the BLM is not considering designating additional Wilderness Study Area. This is because BLM's authority for establishing WSAs ended in 1993. The CRVFO must manage to BLM policy. BLM policy still has not changed to allow designation of WSAs. BLM has no authority to change WSA designations. Only Congress can release a WSA or pass a law to designate a WSA as a wilderness area. WSAs are designations.

### **22.4 THOMPSON DIVIDE AREA PROTECTED AS WILDERNESS**

**Comment Summary:** Several commenters suggested that the BLM should protect the Thompson Divide area as wilderness.

**Response:** The Thompson Divide area on BLM public lands outside of the boundary of the Thompson Creek land with wilderness characteristics were inventoried and not found to have wilderness characteristics. The range of alternatives covers different management actions that may occur, including in regards to fluid mineral leasing.

### **22.5 FLUID MINERAL LEASING WITHIN WILDERNESS STUDY AREAS**

**Comment Summary:** Several commenters were concerned about the potential for fluid minerals leasing within WSAs and recommended that the BLM protect against this activity.

**Response:** The BLM analyzed the effects of closing WSAs to fluid minerals leasing in all alternatives. Lands managed to protect wilderness characteristics are closed to fluid minerals leasing in Alternative C. Currently, no fluid mineral leasing occurs within WSAs.

### **22.6 DUAL MANAGEMENT DESIGNATIONS**

**Comment Summary:** A couple of commenters were concerned about overlaying designations or protections, such as the Bull Gulch WSA and Bull Gulch ACEC.

**Response:** Dual management decisions can occur when protections are compatible. For instance, an area can be managed both for protections as an ACEC and managed to protect for wilderness characteristics if the protections are compatible. The range of alternatives covers all possible management decisions in those areas.

## **23.0 WILD AND SCENIC RIVERS**

There were 102 comments with issues coded for WSRs.

### **23.1 PROTESTING WILD AND SCENIC RIVER DECISIONS**

**Comment Summary:** Several commenters wanted another chance to look at the BLM's suitability determinations before a final decision was made if the BLM did not select the stakeholder plan.

**Response:** The 30-day protest period after publication of the ROD for the Proposed RMP/Final EIS is available for parties who have standing to protest to explain why a decision was made in error. Information supporting a position about the suitability should be presented as part of a protest.

### **23.2 UPPER COLORADO RIVER WILD AND SCENIC STAKEHOLDER GROUP MANAGEMENT PLAN**

**Comment Summary:** There was support for the BLM to manage the eligible segments of the Colorado River under *Upper Colorado River Wild and Scenic Stakeholder Group Management Plan*.

**Response:** Under the Proposed RMP/Final EIS, BLM would adopt and implement the *Upper Colorado River Wild and Scenic Stakeholder Group Management Plan* (Appendix Q) to protect the free-flowing nature, outstandingly remarkable values (ORVs), and tentative classifications for Colorado River Segment 6 (recreational) and Colorado River Segment 7 (recreational). The USFS would adopt and implement the stakeholder management plan for Colorado River Segment 1 (recreational) and Colorado River Segment 2 (recreational).

The agencies would defer suitability determination for these two river segments. If monitoring indicates that the stakeholder management plan is not adequately protecting the free-flowing nature, ORVs, and tentative classification, the BLM and USFS would initiate a process to evaluate suitability and make a determination. The eligibility determination for the two segments will remain in place until a suitability determination is made.

### **23.3 WILD AND SCENIC RIVER BOUNDARIES SHOULD BE EXPANDED TO INCLUDE THE ENTIRE WATERSHED.**

**Comment Summary:** Several comments wanted river corridor boundaries expanded, sometimes to include the entire watershed.

**Response:** In suitability recommendations, adjustments can be made to accommodate topographic features such as canyon walls, but expansion of study area boundaries to include the entire watershed boundaries is not authorized by the Wild and Scenic Rivers Act or by BLM and USFS manual guidance. Section 4(d) of the Act specifies that until boundaries are officially established by Congress for designated rivers, an interim protective boundary will be in effect, generally comprising "that area measured within one-quarter mile from the ordinary high water mark on each side of the river."

For the final suitability report, BLM modified the boundaries of Deep Creek to (1) incorporate the entire area within the canyon walls on the main canyon, and (2) align the boundaries with the USFS boundary for the Deep Creek segment.

### **23.4 STREAM SEGMENTS ON THE ROAN PLATEAU**

**Comment Summary:** There were comments requesting the BLM to identify the eligible stream segments on the Roan Plateau as suitable for inclusion into the National Wild and Scenic Rivers System (NWSRS).

**Response:** A portion of the CRVFO known as the Roan Plateau (73,600 acres including BLM and private lands) is covered under the Roan Plateau Planning Area RMP Amendment and EIS (BLM 2007a, 2008b). Because decisions for the Roan Plateau area have been addressed in a separate plan amendment, which is currently under litigation, that area is not included in this RMP revision.

The ROD for the Roan Plateau Resource Management Plan Amendment found these streams eligible for designation. The corridors associated with these stream segments are currently protected by a CSU restriction (GS-CSU-ROAN-17 - Wild and Scenic River Eligibility Corridor) until a suitability determination is made.

Any determinations contained in the *Final Wild and Scenic Rivers Suitability Report* for streams located within BLM's Roan Plateau planning area (East Middle Fork Parachute Creek Complex and East Fork Parachute Creek Complex) will become final when the BLM State Director signs a ROD for the Roan Plateau plan. The US District Court for the District of Colorado has remanded the 2008 Roan Plateau Plan back to the BLM for further analysis that will appear in a Supplemental EIS. The Supplemental EIS contain additional analysis and information that may modify the initial WSR determinations contained in the report.

Suitability determinations for inclusion in the NWSRS on eligible Roan Plateau stream segments discussed in the Draft RMP/Draft EIS have been deferred to the supplemental EIS for the Roan Plateau RMP Amendment. Therefore, under all alternatives in this plan, the BLM will maintain eligible status for East Middle Fork Parachute Creek Complex and East Fork Parachute Creek Complex until a ROD is entered for the Roan Plateau planning area. At that time, the BLM will render a suitability determination using information and alternatives from this planning process, along with any new alternatives and information generated for the Roan Plateau planning area Supplemental EIS.

### **23.5 SUPPORT OR OPPOSITION FOR FINDING CERTAIN RIVER SEGMENTS SUITABLE**

**Comment Summary:** There were many comments in support or opposition for finding particular river segments suitable. In addition, commenters included specific reasons for their support or opposition.

**Response:** The WSR Suitability Report was available during the public comment period online or by request. This report shows the analysis for suitability per river segment as BLM Manual 8351 outlines. It documents the reasons and details for each finding. For example, if the river segment contains the "Fish" ORV, the report discusses various approaches for managing the fish value, such as following the framework for maintaining and enhancing known populations of Colorado River cutthroat trout through the "Conservation agreement for Colorado River cutthroat trout in the States of Colorado, Utah, and Wyoming."

### **23.6 RIVER ACCESS**

**Comment Summary:** A couple of commenters were concerned WSR suitability findings would affect river access for recreation.

**Response:** The WSR section in Chapter 4 analyzes the effects of protecting recreation outcomes and setting prescriptions, which include new and enhanced river access. In the Alternative D analysis under the WSR section, enhanced access was found to benefit recreational ORVs. Alternative C analyses maximum resource protection, and showed that this approach also benefits some ORV's along the Upper Colorado River. The range of alternatives in Chapter 4 does provide an analysis of introducing new and enhanced river access while maintaining maximum resource protection. BLM's proposed classification of the Upper Colorado River segments is "recreational," which is the most permissive classification, in terms of authorizing additional developments to support recreational use. Each proposed project in the river corridor will have to be

analyzed on a case-by-case basis to insure compliance with the Wild and Scenic Rivers Act. New developments can be authorized, provided that the proposed development does not create any significant negative impact to the ORVs, water quality, or free-flowing nature of the segment.

### **23.7 OVERLAYING PROTECTIONS ON STUDY RIVER SEGMENTS**

**Comment Summary:** Several comments were concerned about if overlaying protections would be enough to protect a river segment if the segment was not found suitable.

**Response:** Overlaying protections have been looked at for each specific river segment in the *Final Wild and Scenic Rivers Suitability Report*. An example of this is shown through Abrams Creek. In Alternative C, there already exists an NSO for Slopes Greater than 50 percent and/or Soils with Very Severe Erosion Hazard, Threatened, Endangered, Proposed, Candidate, and BLM Sensitive Plant Species Current and Historically Occupied Habitat, VRM Class II Areas with Slopes over 30 Percent and High Visual Sensitivity, Streamside Management Zones, Riparian and Wetland Zones, Core Wildlife Areas, and Perennial Waters. Also, in Alternative C, there already exists a CSU for Developed Recreation Facilities and Trails, Slopes Greater than 30 Percent and/or Soils with Very Severe Erosion Hazard, Hydrologic Features, and Riparian/Wetland Vegetation Zones (within Riparian/Wetland Area and within 500 feet of Outer Edge). In addition, Abrams Creek river corridor (.25 miles on either side of the river high-water mark) would be closed to leasing for fluid minerals, closed to salable/mineral materials disposal, closed to solid minerals leasing in Alternative C. Significant protections already exist under these NSO's, CSU's, and additional restrictions for Abrams Creek in Alternative C. A BLM determination of eligibility or suitability obligates the agency within its authority to manage the segments for the protection of their free-flowing nature, ORVs, tentative classification, and water quality necessary to support the ORVs. Any surface disturbing proposal would have to be determined to not negatively impact these before it would be approved. Therefore, applying a CSU within the river corridor would be repetitive protection for Abrams Creek.

### **23.8 FEDERAL RESERVED WATER RIGHTS**

**Comment Summary:** Many comments surrounded federal reserved water rights. Comments ranged from supporting suitability determinations for the purposes of securing a federal reserved water right to warning that suitability determinations may restrict water providers and water development and can inhibit the state's ability to place water to beneficial use and fully utilize the water available under the Colorado River Compact.

**Response:** Documentation of whether a federal reserved water right would increase protections for specific river segments if found suitable can be found in the *Final Wild and Scenic Rivers Suitability Report*. For example, some segments already have instream flow water rights held by the Colorado Water Conservation Board. However, a Colorado Water Conservation Board (CWCB) water right is not filed to protect recreation values, but to preserve the natural environment, and so recreational ORVs may not be fully protected. Other segments contain ORV's that are not directly tied to the water flow and so a water right would not help to protect those ORVs. The BLM acknowledges the rights of water users and providers to put water to beneficial use. BLM manages public lands for multiple use objectives. Thus, it is not the intent of management actions to restrict water providers, but to protect public lands and water resources for long-term sustainability. The range of alternatives analyzed a scenario where no segments would be suitable for WSR, thus releasing them from interim management protections afforded to eligible segments.

### **24.0 NATIONAL TRAILS AND SCENIC BYWAYS**

There was one comment with issues coded for National Trails and Scenic Byways.

## **24.1 IMPACTS OF MANAGEMENT DECISIONS ON THE WEST ELK LOOP SCENIC BYWAY**

**Comment Summary:** The one commenter was concerned about the impact of proposed BLM RMP decisions on the West Elk Loop Scenic Byway.

**Response:** The West Elk Loop Scenic Byway is a Colorado State Scenic Byway and a National Forest Scenic Byway. The alternatives analyze impacts to the locations surrounding the West Elk Loop Scenic Byway. The USFS is a cooperating agency and will notify BLM of negative impacts of proposed BLM decisions to WRNF lands and designations. Under all action alternatives, Red Hill, The Crown and the northern part of Thompson Creek are designated as VRM Class II. The southern part of Thompson Creek is designated as VRM Class I. The VRM Class I and II designations, along with stipulations to protect other resource values (e.g., NSOs and CSUs) from surface-disturbing actions, afford visual protections to the West Elk Loop Scenic Byway.

## **25.0 TRANSPORTATION FACILITIES**

There were 505 comments with issues coded for transportation facilities.

### **25.1 COLORADO ROADLESS RULE**

**Comment Summary:** There were transportation comments related to the applicability of the Colorado Roadless Rule to BLM lands.

**Response:** On July 3, 2012, the Colorado Roadless Rule became effective with the publication of the final rule in the *Federal Register*. The rule applies to 4.2 million acres of National Forest roadless areas within Colorado and conserves roadless area values for future generations, while providing for activities important to the citizens and economy of Colorado. The Colorado Roadless Rule does not apply to BLM.

### **25.2 LANDING STRIPS**

**Comment Summary:** The majority of the comment letters suggested the BLM needs to designate landing strips and provide the opportunity for use of landing strips through this planning process.

**Response:** Aviation was considered in this planning process. However, there are no designated landing strips within the CRVFO RMP planning area. The Tepee Creek landing strip, which is displayed on some maps, is on private land that has been converted to an agricultural pasture. The landing strip on the Roan Plateau is outside this planning area and is overgrown with vegetation.

Construction of new landing strips is an implementation-level decision. The proposed action alternatives require all motorized aircraft, including, but not limited, to airplanes, helicopters, and ultralights, to have a use authorization for take-off and landing locations on BLM lands or waterways. Emergency landings are permitted without prior approval.

### **25.3 SEASONAL CLOSURES**

**Comment Summary:** A few commenters wanted BLM to make big game seasonal winter closures apply to all human entry. However many more comment letters opposed closing big game winter habitat or priority wildlife habitat to all human use.

**Response:** Big game seasonal winter closures only apply to mechanized and motorized travel, not pedestrian or horse use. In Alternatives B, C, and D; BLM is proposing to work with CPW to close specific areas to human activity and dogs during severe winter weather conditions as defined by a combination of factors



including snow depth, snow crusting, daily mean temperatures (long periods of cold temperatures), and concentrations of animals.

## **26.0 PUBLIC HEALTH AND SAFETY**

A total of 272 comments contained one or more issues coded for public health and safety.

### **26.1 REVIEW OF CURRENT PUBLIC HEALTH AND SAFETY LITERATURE**

**Comment Summary:** Several comments stated that two of the reports cited in Section 3.6.1 (Public Health and Safety) regarding potential human health risks of oil and gas activities in Garfield County were not “peer reviewed,” implying that describing them in the Draft RMP/Draft EIS citing was inappropriate. Specific reference was made to discussions in the Draft RMP/Draft EIS of reports by Coons and Walker (2008) and Witter et al. (2008).

**Response:** Although neither of the reports mentioned in the comments had been published in a peer-reviewed journal, the authors of both reports were highly qualified professionals, and the studies were therefore appropriate for inclusion. However, in describing the methods and findings of those studies, the BLM included considerable discussion on the limited applicability of the studies based on unrealistic some assumptions about the volume and duration of potential emissions to the atmosphere and the proximity of potential long-term receptors (members of the public) to emission sources. The BLM intended to make clear that, although many of the chemicals used in or produced by oil and gas activities—including chemical compounds emitted to the atmosphere—have known environmental or human health risks in certain situations, the volume, duration, and frequency of releases and the location of emission sources relative to human habitations indicate that the actual risk is much lower than the hypothetical risk presented in those reports. For example, the Draft RMP/Draft EIS noted that both reports assumed unabated or under-controlled emissions that differ substantially from actual operations as regulated by BLM and the State of Colorado.

For the Proposed RMP/Final EIS, BLM has clarified further the unrealistic exposure assumptions used by both Coons and Walker (2008) and Witter et al. (2008) to calculate potential risks to human health and safety. Also, as requested by several commenters, BLM has added a reference to a statement in a local newspaper by the co-authors of the Coons and Walker (2008) report, in which they stated that no health crisis currently exists in Garfield County in conjunction with oil and gas activities.

In addition, BLM has included discussions of more recent studies related to atmospheric emissions and to the use of hydraulic fracturing (fracing) to stimulate production of natural gas from deep tight-gas formations such as targeted in the CRVFO. Again, while these additional studies cite potential risks under certain assumptions, none of the studies has demonstrated that significant adverse health effects have occurred or are predicted to occur as a result of actual operations conducted in conformance with BLM and State of Colorado regulations.

### **26.2 AIR AND WATER QUALITY MONITORING AND ENFORCEMENT**

**Comment Summary:** Because the Draft RMP/Draft EIS presented mitigation measures related to air quality and water quality under the four alternatives, several comments stated that the BLM should leave the monitoring and enforcement of air quality to EPA and CDPHE, the agencies responsible for administering and applying the CAA and the CWA in the state of Colorado.

**Response:** The BLM agrees that monitoring and enforcement of air quality and water quality standards are the purview of the EPA and CDPHE. Nonetheless, part of BLM's responsibilities under the federal oil and gas regulations is to manage fluid mineral exploration and development to not cause undue impacts on other resources and resource uses. In that context, the BLM requires oil and gas projects to implement appropriate BMPs and mitigation measures, such as described in the Draft RMP/Draft EIS and Proposed RMP/Final EIS, for the purpose of avoiding, minimizing, or offsetting adverse impacts, including those potentially affecting human health and safety. Adaptive management is used to modify mitigation requirements, through BLM's regulatory authority, when measures are shown to be inadequate to achieve an appropriate level of protection and to comply with federal environmental regulations such as the CAA and CWA.

### **26.3 UNDUE CONSTRAINT OF MITIGATION MEASURES ON OIL AND GAS DEVELOPMENT**

**Comment Summary:** Several comments indicated a concern that mitigation measures such as required for protection of air quality and water quality would inappropriately constrain fluid minerals exploration and development and, specifically, that the number of wells used as the basis for impact analysis under the four alternatives represented a "cap" on future development.

**Response:** The BLM believes that the mitigation measures for oil and gas incorporated into the Proposed RMP/Final EIS strike an appropriate balance between the need for oil and gas development and the need for protection of human health and the environment. Note that based on the results of air quality modeling, some of the more stringent restrictions on oil and gas in the Draft RMP/Draft EIS under some alternatives are not incorporated into the Proposed RMP/Final EIS. Also, note that the numbers of wells analyzed under the alternatives in the Draft RMP/Draft EIS were not intended as caps on development but were assumptions used to conform with the NEPA requirement for analyzing a range of alternatives for the purpose of impact analysis.

### **26.4 REASONABLE FORESEEABLE DEVELOPMENT SCENARIO NOT A CAP ON DEVELOPMENT**

**Comment Summary:** Some comments specifically mentioned that the reasonable foreseeable development scenario (RFD) was portrayed in the Draft RMP/Draft EIS as a cap on future oil and gas development but that such is not the purpose of an RFD.

**Response:** The BLM intended to make the point clearly that the RFD does not predict actual development levels or represent a cap on development and will attempt to make the point more clearly and strongly in the Proposed RMP/Final EIS.

### **26.5 ADEQUACY OF PROTECTIONS OF AIR RESOURCES DURING OIL AND GAS ACTIVITIES**

**Comment Summary:** Several comments expressed a belief that the mitigation measures presented by the BLM in its impact analysis for air quality, would be inadequate to achieve an appropriate level of protection and lead to adverse impacts on public health.

**Response:** The BLM disagrees with the comment's characterization of the air quality impact analysis or the predicted impacts on human health and the environment. The air quality impact analysis addressed both near-field and far-field impacts and both project and cumulative impacts for a wide range of pollutants. The Air Resources Technical Support Document (ARTSD), posted on the project website, underwent thorough review by the EPA, the agency responsible for protection of the nation's air quality pursuant to the Clean Air Act, before it was finalized and published.

## **26.6 EXISTING IMPACTS OF OIL AND GAS ACTIVITIES ON PUBLIC HEALTH**

**Comment Summary:** One comment indicated a belief that existing adverse impacts on human health have been documented in communities located in proximity to oil and gas developments.

**Response:** The BLM takes very seriously its mandate and responsibility to ensure that oil and gas developments are conducted in a manner that avoids or minimizes adverse impacts to human health and safety. Despite unsubstantiated anecdotal accounts in occasional newspaper stories to the contrary, we are unaware of any credible scientific studies demonstrating a significant adverse impact on human health and the environment from the types and levels of development activities currently underway or anticipated in the future. Chapter 2 of the Draft RMP/Draft EIS and the Proposed RMP/Final EIS provide detailed information on mitigation measures aimed specifically at ensuring that this goal continues to be met. If credible evidence of human health effects were to arise, the BLM would work with state and county/local health departments to evaluate additional measures that may be appropriate under BLM's regulatory authority or that of the COGCC.

## **26.7 ADEQUACY OF AIR IMPACT ANALYSIS**

**Comment Summary:** Two comments asserted that the Draft RMP/Draft EIS did not include an adequate analysis of air quality impacts and therefore failed to comply with NEPA and FLPMA.

**Response:** The BLM disagrees with the commenter's characterization of the air quality impact analysis or the predicted impacts on human health and the environment resulting from the detailed and comprehensive air quality modeling effort. The air modeling effort on which much of the impact analysis relied incorporated a variety of conservative (protective) assumptions about future development rates, locations, and emissions and incorporated current or reasonably available mitigation measures. We note that EPA, which is the entity charged with protection of air quality under the CAA, did not cite the deficiencies and adverse results alleged by the commenter during its review of the air quality model, which looked at both near-field and far-field impacts and both human and environmental receptors. In addition, the Proposed RMP/Final EIS incorporates an adaptive management approach to air quality that will enable the BLM to place additional restrictions on emissions as new technologies become available.

## **26.8 ADEQUACY OF OZONE MODELING IN RELATION TO OIL AND GAS ACTIVITIES**

**Comment Summary:** One comment asserted that the ozone modeling conducted as part of the overall air quality modeling did not adequately address ozone concentrations in relation to human health.

**Response:** The air quality modeling used as the basis for the analysis of air quality impacts in the Draft RMP/Draft EIS and Proposed RMP/Final EIS included a thorough evaluation of ozone levels predicted to result under the various alternatives analyzed. Even with the conservative assumptions incorporated into the model, no violation of the NAAQS for ozone was predicted. Occasional monitored values in excess of the NAAQS do not constitute a violation of the standard, which is based on average values over specified time intervals instead of instantaneous values. We also note that the (ARTSD), upon which the RMP's air analysis was based, underwent a thorough review by the EPA, the agency responsible for protection of the nation's air resources.

## **26.9 IMPACTS OF FUGITIVE DUST EMISSIONS FROM VARIOUS LAND USES**

**Comment Summary:** Some comments stressed the importance of dust abatement in relation to activities other than oil and gas activities, for which the Draft RMP/Draft EIS included a requirement for dust abatement.

**Response:** The BLM believes that the Draft RMP/Draft EIS and Proposed RMP/Final EIS adequately address the issue of particulate emissions, primarily as fugitive dust, during oil and gas operations. Specifically, fugitive dust emissions from construction of new oil and gas well pads and access roads, and from vehicular travel on those roads, were key components of the air quality model in relation to public health and the environment. In addition, the Proposed RMP/Final EIS extends the dust abatement requirements to all industrial activities in addition to oil and gas development. However, the BLM disagrees with the assertion that fugitive dust emissions from off-highway vehicle travel or grazing operations warrant special consideration relative to public health.

## **26.10 IMPACTS OF OIL AND GAS ACTIVITY ON WATER RESOURCES**

**Comment Summary:** Some comments cited previous occurrences of pollution of surface and groundwater resources from oil and gas activities as a basis for concern that such impacts are more widespread and may become worse in the future.

**Response:** The BLM is aware of the small number of incidents linking water pollution with oil and gas activities resulting from improper construction of oil and gas wells. As a result of those incidents—including one case involving a water well in Garfield County in 2001 and another involving a seep along Divide Creek in Garfield County in 2004—both the COGCC and the BLM (which had no jurisdiction over the private oil and gas activities leading to these problems), adopted more stringent requirements for casing and cementing of well bores. These measures are intended to ensure that hydrocarbon-bearing strata at great depths remain isolated from surface waters and freshwater-bearing strata at shallow depth. Subsequent investigations by COGCC and USGS have not identified any linkage between hydraulic fracturing and water wells.

## **26.11 RISKS TO PUBLIC HEALTH ASSOCIATED WITH HYDRAULIC FRACTURING**

**Comment Summary:** One comment focused specifically on hydraulic fracturing for well completions and included an assertion that BLM's regulations are outdated and inadequate to ensure public protection. The comment also addressed the growing public concern about this technology and the chemicals used.

**Response:** The BLM believes that its current management of drilling and completion (including hydraulic fracturing) is protective of human health and the environment and that such has been corroborated in studies conducted to date by the USGS and COGCC. Moreover, BLM is able, through its regulatory authority, to place additional restrictions or specify other requirements relative to "fracing" in response to new data or other facts arising from continued operations and continued scientific inquiry. This type of adaptive management is integral to fluid minerals management at the implementation level, where it is more appropriate than at the long-term planning level of an RMP. The Proposed RMP/Final EIS presents expanded information on hydraulic fracturing technology, including types of chemicals used, horizontal and vertical spread rates and lengths of induced fractures, and potential for connection between the target strata at great depth and shallow aquifers used for domestic or municipal water supply. The expanded text on this topic in Chapter 3 also notes that neither the COGCC nor the USGS have documented linkages between hydraulic fracturing and water wells.

## **26.12 DISPOSAL OF PRODUCED WATER RESULTING FROM OIL AND GAS DEVELOPMENT**

**Comment Summary:** One comment stressed the importance of recycling of water and decreased use of evaporation ponds for dealing with produced water resulting from oil and gas activities and expressed concern about the safety of injection wells for disposing of the water in relation to groundwater resources.

**Response:** Both increased use of recycling and decreased use of evaporation ponds are current major trends in oil and gas development in the CRVFO and this trend is expected to continue with future development. Underground injection of excess water, while having potential risks to the quality of freshwater aquifers for improperly constructed wells, is generally preferable to either solar evaporation ponds or trucking the water to eastern Utah for disposal in evaporation ponds there. The strata into which excess water is injected are typically thousands of feet below the depth of freshwater wells in the region, and the injection wells are designed with the same methods for isolating the borehole from non-target strata, including freshwater aquifers, as used in extraction of fluid minerals. Moreover, the strata into which the waters are injected typically contain naturally saline and hydrocarbon-bearing waters not suitable for municipal, domestic, or agricultural use and not connected hydrologically with waters that are suitable for those uses. Last, it should be noted that the injected waters are treated before injection and not raw industrial waters.

### **26.13 POTENTIAL EFFECTS OF HYDRAULIC FRACTURING ON HUMAN HEALTH**

**Comment Summary:** Some comments indicated concern that use of hydraulic fracturing (“fracing”) technologies in oil and gas well completions represents an unacceptable risk to public health.

**Response:** The BLM believes that its current management of drilling and completion (including hydraulic fracturing) is protective of human health and the environment and that such has been corroborated in studies conducted to date by the USGS and COGCC. Moreover, BLM is able, through its regulatory authority, to place additional restrictions or specify other requirements relative to “fracing” in response to new data or other facts arising from continued operations and continued scientific inquiry. This type of adaptive management is integral to fluid minerals management at the implementation level, where it is more appropriate than at the long-term planning level of an RMP.

### **26.14 PROTECTION OF PUBLIC WATER SUPPLIES**

**Comment Summary:** Some comments expressed concern that public water supplies would not be adequately protected by the mitigation measures incorporated into the Draft RMP/Draft EIS.

**Response:** The Proposed RMP/Final EIS includes measures for the protection of public water supplies that expand on the protections incorporated into the Draft RMP/Draft EIS.

### **26.15 ANALYSIS OF HUMAN HEALTH RISKS DURING OIL AND GAS LEASING**

**Comment Summary:** Two comments requested that the BLM undertake an impact analysis regarding human health prior to issuing any new oil and gas leases to understand the risks and the options to mitigate those risks.

**Response:** All new oil and gas leasing must undergo an Environmental Assessment analysis under NEPA to ensure that leasing is appropriate and that development of the lease would have adequate lease stipulations attached pursuant to the land use plan (RMP) in effect at that time. At the level of the specific project, all development must undergo a project-specific NEPA analysis addressing the location, intensity, and timing of development, ensuring that lease stipulations are applied, and identifying additional restrictions and mitigations as conditions of approval sufficient to ensure no significant adverse impacts, including adverse effects on public health and safety. These two NEPA processes involve an opportunity for public participation.

**26.16 ADEQUACY OF PROTECTIONS FOR PUBLIC HEALTH IN CONJUNCTION WITH OIL AND GAS ACTIVITIES**

**Comment Summary:** Some comments expressed concern that the various management actions and mitigation measures analyzed in the Draft RMP/Draft EIS in relation to oil and gas projects would not adequately protect human health.

**Response:** The BLM disagrees with the assertion that it has not adequately considered public health and safety in the RMP, at Section 3.6.1. Protection of health and safety is a tiered approach. At the planning level of the RMP, the determination is whether a proposed use is capable or incapable of being conducted in an adequately protective manner. The leasing phase, project-specific planning phase, and ongoing inspection and enforcement phase are subsequent tiers in the process. The BLM has concluded, as presented in the Draft RMP/Draft EIS and Proposed RMP/Final EIS, that oil and gas developments using modern techniques conducted in compliance with BLM and other federal or state agencies' requirements (including EPA and CDPHE relative to the Clean Air Act and Clean Water Act, among others) meet this test. Past experience in the CRVFO and statewide further support this conclusion.

**26.17 RISK TO HUMAN HEALTH AND SAFETY FROM CONVERSION OF DRILL RIGS TO NATURAL GAS**

**Comment Summary:** Many comments stated the belief that conversion of drill rigs and some other types of motorized equipment on well pads (e.g., frac pump engines) from diesel to natural gas would pose a significant danger to worker safety due to its lower flash point and is not warranted.

**Response:** For the reasons cited in the comments, and other reasons, the Proposed RMP/Final EIS does not include this measure.

**26.18 DEALING WITH “UNDESIRABLE EVENTS” FROM OIL AND GAS AS RELATES TO HUMAN HEALTH AND SAFETY**

**Comment Summary:** Once comment included a statement that operators must develop, submit, and implement an emergency response and remedial action plan and that the plan must address problems on the pad that endanger human health and safety (e.g., blowouts, fires, explosions, and spills or leaks of toxic or hazardous chemicals) or contaminant the public water supply.

**Response:** This statement is correct. Oil and gas operators have in place emergency action plans that they follow in the event of an undesirable event, including timely notification of emergency responders, local, the state, and BLM. A Spill Prevention, Control, and Countermeasures Plan (SPCC) is required for oil and gas projects. When undesirable events occur, the BLM participates in evaluating any environmental harm or risks to the public, developing appropriate cleanup strategies, and ensuring prompt, appropriate, and effective cleanup. The BLM also evaluates and, as appropriate, places additional requirements on the operator to identify the cause of the event and implement measures to avoid future occurrences. The BLM may also order shutdown of operations as appropriate and, the case of major events, levy fines.

**26.19 DEALING WITH ILLEGAL DUMPSITES THAT POSE A RISK TO HUMAN HEALTH AND SAFETY**

**Comment Summary:** One comment questioned whether the BLM would be capable of meeting its burden of responding to and remedying illegal dumpsites, including those containing hazardous materials. The commenter(s) noted that numerous such sites have been observed on BLM lands in conjunction with recreation and other activities.

**Response:** Illegal dumping, including dumping of hazardous materials, cannot be prevented by increasing the number of law enforcement officers. What is more important, and which BLM believes is being adequately accomplished, is the prompt identification and remediation of illegal dumpsites, with a priority to those representing a risk to public health and safety. The large number of BLM representatives on the ground almost daily in conjunction with recreation, grazing, and oil and gas activities increases the likelihood of dumps being detected and dealt with promptly.

#### **26.20 PRIORITY OF FIREFIGHTER SAFETY IN COMBINATION WITH BLM'S PRIORITY ON PROTECTING PRIVATE PROPERTY**

**Comment Summary:** One comment stated that the BLM should emphasize the protection of public health and safety should be the top priority in fire suppression—e.g., “near homes, people, and critical community infrastructure”—instead of placing a priority on protective dispersed industrial (oil and gas) facilities.

**Response:** The BLM agrees that the protection of public health and safety should be the top priority—behind firefighter safety—and indeed such is the priority in the CRVFO Fire Management Plan.

#### **26.21 BUDGET IMPLICATIONS OF INCREASING FIRE RISK FROM DISPERSED INDUSTRIAL FACILITIES**

**Comment Summary:** One comment stated that the RMP needs to analyze and disclose budgetary implications of increased fire risk from the increasing amount of industrial facilities and access roads in wildland settings.

**Response:** The BLM disagrees that this is a planning-level issue. While industrial activities have the potential for more fires, implementation-level requirements such as conditions of approval to reduce the risk of fire associated with welding during construction of oil and gas pipelines ameliorate this risk. The presence of numerous industry and agency personnel engaged in conducting or inspecting oil and gas activities and the good access into those areas via well-maintained roads would increase the promptness with which any fire, whether natural or human-caused, is spotted and suppressed.

#### **26.22 ADEQUACY OF ANALYSIS OF COAL IMPACTS**

**Comment Summary:** One comment asserted that the Draft RMP/Draft EIS did not adequately analysis impacts on human health and the environment from coal mining.

**Response:** The Draft RMP/Draft EIS and Proposed RMP/Final EIS make it clear that coal mining is not anticipated to occur on federal lands or involving federal mineral resources during the life of the plan. The Proposed RMP/Final EIS differs from the Draft RMP/Draft EIS by reaching a conclusion that no potentially developable coal resources currently exist within the planning area given geologic, economic, and environmental constraints. In the unlikely event of a future proposal for coal leasing and development, the BLM would implement the screening process laid out in 43 CFR 3461 in conjunction with preparation of an EIS, providing an opportunity for public participation.

#### **26.23 OIL AND GAS DEVELOPMENT IN THE THOMPSON DIVIDE AREA**

**Comment Summary:** Some comments noted that the Draft RMP/Draft EIS does not address potential development of existing oil and gas leases in the Thompson Divide area.

**Response:** The RMP does not specifically address potential development in the Thompson Divide area, which would be conducted on USFS lands. Although the BLM would be responsible for approving any

APDs for federal oil and gas wells, the USFS would conduct the NEPA analysis and be responsible for decisions regarding construction of well pads and surface facilities.

## **27.0 SOCIAL AND ECONOMIC CONDITIONS**

There were 882 comments with issues coded for social and economic conditions. The bulk of the comments expressed views on the economic benefits or impacts to individuals, communities, and economies from energy resource development. The economic benefits of non-market values (e.g., scenic values and cultural and natural resource values) were also directly mentioned or indirectly implied.

### **27.1 HOUSING**

**Comment Summary:** Several commenters expressed concerns about the validity of the housing and vacancy rates expressed in the plan.

**Response:** The high vacancy rate results from the very high vacancy rates among resort communities in the region, as explained in the document. The communities where the majority of oil and gas development occur have very low vacancy rates. The document states, “Some potential for effects on the availability and affordability of housing exists in Garfield County, given the possibility of concentrated oil and gas activity alongside low housing vacancy rates.”

### **27.2 ECONOMIC DATA**

**Comment Summary:** Several commenters expressed concern over the age of the economic data being used in the analysis.

**Response:** The RMP process is a lengthy one. The data used were the most current available economic and demographic information at the time the preliminary draft was being written and when the final draft was being written. To update these data every year or as new data are released would entail effectively re-writing the entire section, over and over again. The recent economic downturn, though significant, is unlikely to change basic economic premises in the region over a long-term scale.

### **27.3 TOTAL ECONOMIC VALUATION FRAMEWORK**

**Comment Summary:** Commenters suggested the socioeconomic analysis should be updated to quantify non-market values using a Total Economic Valuation Framework. Other comments suggested BLM should not use the IMPLAN.

**Response:** Total economic valuation framework would require large-scale non-market studies, such as contingent valuation, which are beyond the scope of this process. Non-market values are addressed in the document, though generally in a qualitative manner. All predictive methods, no matter what field, inherently use some assumptions to reach their forecasts. The Economic Profile System developed by the Sonoran Institute is useful, but it does not predict future employment effects, as IMPLAN does.

### **27.4 CUMULATIVE EFFECTS**

**Comment Summary:** Several commenters expressed concern over the economic analysis expressing the limited effect of area dependence on BLM related employment.

**Response:** The percentage of local employment based on BLM managed programs is quite small across all alternatives. Though the differences in employment and income will undoubtedly be felt strongly by those individuals affected, these changes in economic impacts are extremely small compared with the entire



economy of the region. The area is thus expected to maintain the same basic level of dependency on BLM related employment across all alternatives. Thus, for those workers, the cumulative effects will also be the same. It is very likely that the income for an individual employee in the oil and gas sector will not change depending on which alternative is selected. The total number of employees may differ slightly.

## **27.5 PREDICTED MINERAL DEVELOPMENT LEVEL AND EFFECTS FROM MINERAL LAND CLOSURES AND RESTRICTIONS**

**Comment Summary:** Several commenters expressed concern over the predicted level of mineral development used in the economic impact analysis as well as the effect of closing or restricting portions of high mineral potential.

**Response:** The predicted levels of mineral development, in particular fluid mineral development, in the draft plan were based on the need for a variety of impacts for air resources. The levels of development in the final plan are relatively similar to one another due to the fact that 88% of the high potential area for oil and gas development has already been leased. Therefore only a small fraction of the high potential area is even available to be affected by the different alternatives. The Final EIS Chapter 4 analysis within the Social and Economic Conditions section details the employment and income differences expected between each alternative. The minerals section explains the nature of predicted extraction in detail.

## **27.6 NON-MARKET VALUES**

**Comment Summary:** Several commenters expressed concern over the lack of identification of non-market values within the region.

**Response:** It was not within the scope of this document to quantify the economic value for non-market benefits within the planning area. However, non-market values are addressed quantitatively within the document and the differences between non-market values in each alternative are highlighted as well. Please see sections entitled “Role of Amenities, Migration, and Non-Market Values” within the Social and Economic Conditions chapter. In addition, the Final EIS Chapter 4 analysis was revised to better describe the benefits of BLM lands being left in their natural undeveloped states through: VRM designations, special designations (ACECs, SRMAs) and RMP-level identifications (lands managed to protect wilderness characteristics).

## **27.7 PROJECTED RESOURCE OUTPUTS FROM BLM MANAGEMENT ACTIONS**

**Comment Summary:** The cooperating agencies and public comments expressed concerns about BLM outputs by alternative used in the social economic analysis, specifically for natural gas production.

**Response:** Projected resource outputs from BLM management actions for each of the alternatives are presented in Table 4.6.2-1. The projected outputs and activities were revised based on new data acquired since publication of the Draft RMP/Draft EIS and current staff knowledge. The updated BLM outputs detailed in Table 4.6.2-1 lead directly to updated figures presented for employment (Table 4.6.2-2) and income (Table 4.6.2-3). If the quantity of natural gas expected to be produced increases, the number of jobs associated with natural gas drilling and production would be expected to increase as well. The relationship between the physical outputs and the resultant employment and income is determined by the IMPLAN input-output model which incorporates indirect and induced contributions to the regional economy.

## **28.0 ALTERNATIVES**

There were 1,469 comments on alternatives. The vast majority of these were expressions of support for or opposition of one of the alternatives. Commenters also expressed support or opposition of a specific

resource or resource use programs decisions (e.g., I support Alternative C.). Some of these comments were addressed by program specific comment responses.

## **28.1 RANGE OF ALTERNATIVES**

**Comment Summary:** Many commenters felt that BLM failed to look at an adequate range of alternatives.

**Response:** The phrase "range of alternatives" refers to the alternatives discussed in environmental documents. The four alternatives in the Draft RMP/Draft EIS and the Proposed RMP/Final EIS offer a range of management options to address the key scoping issues. Socioeconomic benefits were just one of the considerations in development and analysis of the alternatives.

## **28.2 PREFERRED ALTERNATIVE**

**Comment Summary:** Commenters also expressed support or opposition to the selection of the Preferred Alternative. Alternative B was selected as the Preferred Alternative in the Draft RMP/Draft EIS.

**Response:** The preferred alternative in the Draft RMP/Draft EIS is the alternative that BLM believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors. If any one alternative contains the desired combination of potential planning decisions, then that alternative should be identified as the preferred alternative. Alternative B in the Draft RMP/Draft EIS was identified as the preferred alternative. It was developed in collaboration with cooperating agencies and the RAC sub-group to show a balanced, multiple-use alternative. See Draft RMP/Draft EIS, Section 2.6, Rationale for Identification of the Preferred Alternative, for a full discussion on the selection of the preferred alternative. The selection of Alternative B as the preferred alternative in the Draft RMP/Draft EIS does not preclude the selection of other alternatives for the Proposed RMP/Final EIS.

## **29.0 RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT PROCESS**

There were 1,252 comments concerning the RMP/EIS process. Most of these comments were addressed by program specific comment responses.

## **29.1 RESOURCE MANAGEMENT PLAN PROTEST PERIOD**

**Comment Summary:** Comment letters stated some decisions in the Draft RMP/Draft EIS would be protested if selected.

**Response:** Pursuant to BLM's planning regulations at 43 CFR 1610.5-2, any person who participated in the planning process for this PRMP and has an interest that is or may be adversely affected by the planning decisions may protest approval of the planning decisions within 30 days from date the EPA publishes the Notice of Availability of the Proposed RMP/Final EIS in the *Federal Register*.

## **29.2 PUBLIC COMMENTS**

**Comment Summary:** Commenters questioned the scope of the public involvement process and BLM's process for responding to comments.

**Response:** Planning is inherently a public process. The BLM uses a number of involvement methods to work with members of the public, interest groups, and governmental entities. Public comments on the Draft RMP/Draft EIS were reviewed individually and considered as part of the process in developing the Proposed RMP/Final EIS. The comments were discussed internally and with cooperating agencies and the BLM's

Northwest RAC (and subgroup). A summary of public involvement is found in Chapter 5 and responses to comments can be found in Appendix V.

### **29.3 COMPLEXITY OF THE DRAFT RMP/DRAFT EIS**

**Comment Summary:** A comment complaint was that the document was too long and complex.

**Response:** BLM acknowledges that the document is long and complex. To help readers understand the contents, BLM included an executive summary and summary tables (e.g., Table 2-1 and Table 2-2) to provide an overview of the document's purpose and contents. Additionally, BLM hosted three open houses (Eagle, Silt, and Carbondale) to answer questions. BLM staff also answered numerous public questions via phone calls and emails.

### **30.0 CONSULTATION AND COORDINATION**

There were 363 comments discussed consultation and coordination. Some of comments were addressed by program specific comment responses.

#### **30.1 CONSULTATION WITH ENVIRONMENTAL PROTECTION AGENCY**

**Comment Summary:** EPA's role in the planning process, the CAA, and the CWA was discussed or questioned in some letters.

**Response:** NEPA requires the BLM to integrate environmental values into their decisionmaking processes by considering the environmental impacts of their proposed actions and reasonable alternatives to those actions. To meet NEPA requirements federal agencies prepare a detailed statement known as an EIS. EPA reviews and comments on EISs as well as maintains a national filing system for all EISs.

#### **30.2 COLORADO OIL AND GAS CONSERVATION COMMISSION**

**Comment Summary:** BLM's consultation with Colorado Oil and Gas Conservation Commission and the jurisdictional authority of each agency in the case of overlapping jurisdictions was questioned.

**Response:** A memorandum of understanding between the Colorado BLM and the COGCC was developed to explain how the two agencies can work together. Most operations occur on adjacent lands or on the same lands, and it is important that both agencies provide oil and gas lessees and operators with consistent policies and procedures on federal and Native American lands, as well as non-federal lands. The MOU's objectives are to (1) avoid duplication of effort by the responsible oil and gas permitting agencies, and (2) clearly define jurisdictional authority in overlapping jurisdictions. See the web site: <http://cogcc.state.co.us/Library/mou-moa/MOU-BLM.htm>.

#### **30.3 BLM'S AUTHORITY**

**Comment Summary:** Comments questioned BLM's authority or direction to make certain program decisions or analyze impacts of proposed actions.

**Response:** BLM manuals (e.g., MS-7300 – Air Resource Management Program, M-4100 – Grazing Administration) and handbooks (e.g., BLM 1601-1 - *Land Use Planning Handbook*, BLM H-1790-1 – NEPA Handbook) set forth the authority, policy, objectives, and program structure. BLM must analyze the potential effects of BLM-authorized activities on resources such as air quality as part of the planning, environmental review, and decisionmaking processes.

### 30.4 COOPERATING AGENCIES

**Comment Summary:** The participation, the process or the input of cooperating agencies was discussed in a few letters.

**Response:** On November 29, 2006, the BLM invited local, state, federal, and tribal representatives to participate as cooperating agencies for the RMP revision. The following agencies with jurisdiction, special expertise, or interest in the RMP revision process agreed to participate as cooperating agencies:

Cooperating Agencies	
Federal Agencies	
• US Fish and Wildlife Service	White River National Forest
State Agencies	
• Colorado Department of Natural Resources	• Colorado River Water Conservation District
Local Agencies	
• Denver Water Board	• Eagle County
• Garfield County	• Grand County*
• Jackson County*	• Pitkin County
• Town of Basalt	• Town of Carbondale
• Town of Eagle	• City of Glenwood Springs
• Town of Granby*	• Town of Gypsum
• Town of Hot Sulphur Springs*	• Town of Kremmling*
• Town of New Castle	• Town of Parachute
• Town of Rifle	• Town of Silt

\* Predominantly worked with the KFO

### 30.5 UPPER COLORADO RIVER WILD AND SCENIC STAKEHOLDER GROUP

**Comment Summary:** Most letters expressed support for implementation of the *Upper Colorado River Wild and Scenic Stakeholder Group Management Plan*.

**Response:** In February 2011, the BLM and USFS received a proposal titled *Upper Colorado River Wild and Scenic Stakeholder Group Management Plan*, that provided a management alternative for Colorado River Segments 4, 5, 6, and 7. Colorado River Segments 4 and 5 are located within the KFO planning area and are addressed in the KFO RMP effort. Colorado River Segments 6 and 7 are located within the CRVFO planning area and are addressed in this RMP effort. The Upper Colorado River wild and scenic stakeholder group represents a diverse range of interests, including local governments, East Slope and West Slope water user organizations, environmental and recreation organizations, and private landowners. The group has worked together since 2008 to develop a stakeholder group management plan. The goal of the plan is to protect the ORVs identified in the BLM and USFS Eligibility Reports for Segments 4 through 7 of the Upper Colorado River, while simultaneously providing certainty and flexibility for the water users who rely upon diversions from the Upper Colorado River.

The stakeholder group asked the BLM to consider adopting the plan as part of its RMP. The intent is to use cooperative management strategies in multiple arenas, including flow management, water quality management, fisheries and recreation management, and responding to new water development projects. The stakeholder group developed the plan in consultation with the CWCB, CPW, and the US Department of the

Interior, Bureau of Reclamation. The BLM and USFS accepted this plan for impact analysis as part of the Draft RMP/Draft EIS.

### **30.6 CLEAN WATER ACT SECTION 404 PERMIT**

**Comment Summary:** A few comments questioned authorities or processes under the Clean Water Act Section 404 Permit.

**Response:** Project sponsors are required to obtain a CWA Section 404 permit if a proposed action would result in the discharge of dredged or fill materials in waters of the United States, including wetlands. The legal reference is Section 404 of the Water Pollution Control Act of 1972, as amended by the Clean Water Act (1977 and 1987). The agency responsible for issuing a Section 404 permit is the US Army Corps of Engineers. The purpose of the regulation is to restore and maintain the chemical, physical, and biological integrity of the nation's waters through preventing, reducing, and eliminating pollution. The permit application allows the US Army Corps of Engineers to review the project plans and potential impacts to waters of the US, and to ensure that the project is designed to prevent or reduce harm to those waters.

### **31.0 OTHER CODED COMMENTS**

#### **31A CUMULATIVE IMPACTS**

There were 72 comments with issues coded for cumulative impacts. Cumulative impact comments were dealt with within each program comment responses.

#### **31B SCOPE OF THE EIS**

There were 376 comments with issues coded for scope of the EIS. Scope of EIS comments were dealt with within each program comment responses.

#### **31C ENVIRONMENTAL JUSTICE**

There were no comments with issues coded for environmental justice

# APPENDIX V

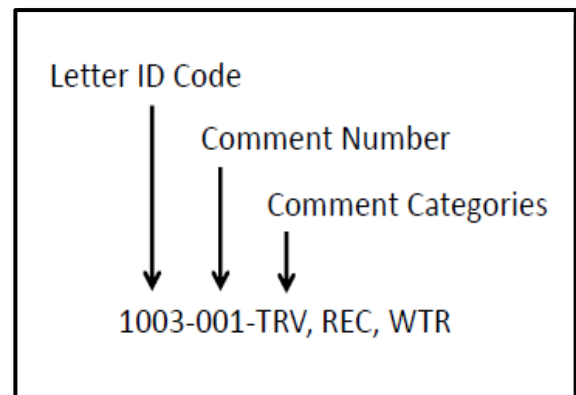
## PART 2: COMMENTS

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All letters, emails, faxes, and documents handed in to the BLM, with comments on the Draft RMP/Draft EIS, were logged, reviewed, and categorized for consideration by the appropriate resource specialist(s) of the Interdisciplinary Team.

All of the comments were coded with a letter number, comment number and a resource code for each resource issue addressed by the comment. The tables are organized by the commenter's name, any organizations represented, letter code, and comment identification codes. The summarized responses for each comment code are presented in Part 1 of this appendix.

Table V-2 lists the agencies that provided comments on the Draft RMP/Draft EIS. Table V-3 lists all other commenters including members of organizations as well as organizations. Those comments that were part of a comment campaign are discussed in Part 3 of this appendix. Table V-4 lists those comments where the commenter name or organization was illegible or the comments were presented anonymously.



**Table V-2**  
**List of Agency Commenters on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Agency</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Fitzwilliams	Scott G.	USDA, Forest Service, White River National Forest	1703	1703-001-TRV, ALT, SOC, PRC, REC, PLC; 1703-002-TRV, PLC, ALT, SOC, PRC; 1703-003-PLC, ALT, REC, TRV, SOC, PRC; 1703-004-PLC, TRV, ALT; 1703-005-PLC, TRV, ALT; 1703-006-PLC, TRV, ALT; 1703-007-PLC, REC, ALT, TRV; 1703-008-PLC, REC, ALT, TRV; 1703-010-RLT, MIN, PRC, CON; 1703-011-CON, PRC, SOC, CON, OIL; 1703-012-OIL, CON, PRC, SOC, RLT; 1703-013-OIL, PRC, SOC; 1703-014-PRC, SOC, TRV, CON; 1703-015-OIL, PRC, SOC, MIN, RLT, PLC; 1703-016-CUM, PLC, ALT, RLT; 1703-017-VIS, PRC; 1703-018-CUM, PRC, SOC; 1703-019-VIS, PRC, CON; 1703-020-AIR, PRC; 1703-021- PRC, SOC, VIS; 1703-022-AIR, PRC, SOC; 1703-023-AIR, PRC, SOC; 1703-024-AIR, PRC, SOC; 1703-025-AIR, OIL, PRC, SOC, ALT; 1703-026-AIR, PRC, SOC, ALT; 1703-027-AIR, PRC; 1703-028-AIR, PLC, PRC; 1703-029-AIR, PRC; 1703-030-AIR, ALT, PRC, OIL; 1703-031-PRC, ALT, OIL, AIR; 1703-032-PRC, ALT, AIR; 1703-033-AIR, PRC, ALT, OIL; 1703-034-AIR, PRC, ALT, CON, SOC
Webber	Steven	USDOE, Western Area Power Administration	11650	11650-001-RLT, PHS, TRN, TRV, ACC, VEG; 11650-002-PRC, TRV, TRN, RLT; 11650-003-RLT, PRC; 11650-004-TRV, TRN, CON, PRC, RLT; 11650-005-RLT, VEG, CON; 11650-006-RNW; 11650-007-PRC, RNW, CON; 11650-008-VIS, SOC; 11650-009-RLT, CON
Clayton	Creed	USDI, USFWS	1702	1702-001-ALT, FWL, OIL; 1702-002-ACC, FWL, ALT, OIL; 1702-003-FWL, ACC, ALT; 1702-004-ALT, FWL, ACC, PLC, SOC; 1702-005-ACC; 1702-006-FWL, ALT; 1702-007-FWL, CON, ALT; 1702-008-FWL, OIL, ALT, SOC, PRC; 1702-009-FWL, OIL, ALT, PRC; 1702-010-FWL, ALT, CON, SOC, PRC, ACC; 1702-011-ALT, FWL
Salas	Crystal	USDI, NPS	11347	11347-001-PRC, CON

**Table V-2**  
**List of Agency Commenters on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Agency</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Bohan	Suzan	Environmental Protection Agency	097	097-001-WTR, CON; 097-002-WTR, PRC; 097-003-WTR; 097-004-WTR; 097-005-WTR, OIL; 097-006-PRC, OIL, WTR; 097-007-FWL, CON; 097-008-FWL, WTR, VIS, REC; 097-009-WSR; 097-010-WTR; 097-011-AIR, PHS, VIS; 097-012-AIR; 097-013-ACC; 097-014-PRC, CON; 097-015-WTR; 097-016-WTR; 097-017-WTR, OIL, PHS, AIR; 097-018-WTR; 097-019-WTR; 097-020-WTR; 097-021-WTR; 097-022-WTR; 097-023-WTR, OIL
King	Steve	State of Colorado	17023	17023-001-ALT, SOC; 17023-002-CON, SOC; 17023-003-OIL, SOC, SOC; 17023-004-SOC; 17023-005-SOC, CON, SOC; 17023-006-PRC; 17023-007-SOC, OIL; 17023-008-SOC, SOC; 17023-009-PRC; 17023-010-ALT, SOC, OIL, SOC, PRC
DiLeo	Jim	State of Colorado, Department. of Health and Environment	13324	13324-001-AIR, ALT; 13324-002-OIL, MIN, AIR; 13324-003-AIR; 13324-004-OIL, MIN, AIR; 13324-005-OIL, MIN, WTR; 13324-006-AIR; 13324-007-AIR, ALT, OIL, MIN; 13324-008-AIR; 13324-009-OIL, MIN, ALT, AIR; 13324-010-ALT, WTR, OIL, MIN; 13324-011-ALT, AIR, OIL, MIN; 13324-012-AIR, ALT, WTR, OIL, MIN; 13324-013-AIR, ALT, OIL, MIN; 13324-014-AIR; 13324-016-AIR, OIL, MIN, CON; 13324-017-AIR
Velarde	Ron	State of Colorado Parks and Wildlife	17252	17252-001-CON, PRC; 17252-002-SOC, REC, FWL, ALT; 17252-003-OIL, MIN, FW ; 17252-004-RNW, ALT; 17252-005-OIL, FWL, PRC; 17252-006-CUM, OIL, FWL, ALT, PRC; 17252-007-FWL, ALT; 17252-008-WTR, FWL, MIN; 17252-009-SSS, ACC; 17252-010-FWL; 17252-011-TRV; 17252-012-ACC, PLC, CON, SSS, FWL, CAV; 17252-013-ACC, ALT, OIL, TRV, VEG, PLC; 17252-014-SSS, ALT, OIL, ACC; 17252-015-CON; 17252-016-PRC; 17252-017-ALT, WSA, ACC, WSR; 17252-018-ALT, FWL; 17252-019-ALT; 17252-020-ALT, FWL; 17252-021-ALT; 17252-022-GRZ; 17252-023-PRC, CON; 17252-024-ALT, OIL, PLC; 17252-025-ALT, REC, FWL; 17252-026-ALT, PRC, FWL;



**Table V-2**  
**List of Agency Commenters on the Draft RMP/Draft EIS**

Agency		Letter ID	Comment ID Codes
Last Name	First Name	Code	
continued		17252	17252-027-ALT, FWL; 17252-028-FWL, PRC, ALT; 17252-029-PRC; 17252-030-ALT, SOI; 17252-031-ALT, SOI; 17252-032-ALT, WTR; 17252-033-ALT, VEG, SSS; 17252-034-ALT, VEG, WTR; 17252-035-ALT, VEG, FWL; 17252-036-ALT, FWL; 17252-037-ALT, WTR, FWL; 17252-038-ALT, FWL, WTR, PLC, PRC, MIN; 17252-039-ALT, FWL, WTR; 17252-040-ALT, FWL, PLC, CON; 17252-041-ALT, FWL, PLC, VEG; 17252-042-ALT, FWL, SSS, PLC; 17252-043-ALT, MIN, OIL; 17252-044-ALT, FWL; 17252-045-ALT, SSS; 17252-046-ALT, FWL, ACC; 17252-047-ALT; 17252-048-ALT, FWL, SSS; 17252-049-ALT, SSS, ACC; 17252-050-ALT, FWL; 17252-051-ALT, OIL, MIN, LWC; 17252-052-ALT, GRZ; 17252-053-ALT, REC, FWL; 17252-054-ALT, REC, FWL, PLC; 17252-055-ALT, RLT, FWL; 17252-056-ALT, MIN; 17252-057-ALT, MIN, OIL; 17252-058-ALT, OIL, MIN, WTR, FWL, SSS, ACC; 17252-059-ALT, MIN, OIL, FWL; 17252-060-ALT, MIN; 17252-061-ALT, ACC; 17252-062-WTR; 17252-063-WTR, FWL, CUM; 17252-064-WTR, FWL; 17252-065-VEG; 17252-066-FWL; 17252-067-ALT, SSS; 17252-068-REC; 17252-069-RLT, FWL; 17252-070-MIN, ALT, FWL, CON; 17252-071-PHS; 17252-072-CUM; 17252-073-FWL, OIL; 17252-074-FWL, SOI, WTR; 17252-075-FWL, REC; 17252-076-FWL, WTR; 17252-077-FWL; 17252-078-ALT, FWL; 17252-079-FWL, TRV; 17252-080-FWL, OIL; 17252-081-REC, ALT; 17252-082-RLT, SSS, FWL, REC; 17252-083-PLC; 17252-084-FWL; 17252-085-TRV, TRN, FWL, REC, ALT; 17252-086-OIL, MIN, ALT, FWL, SSS, WTR; 17252-087-SOC, PRC, CON, FWL, ALT; 17252-088-FWL, PRC

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<b>Last Name</b>	<b>First Name</b>	<b>Agency</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Martin	John	Eagle County	12004	12004-001-PRC; 12004-002-ALT, REC; 12004-003-ALT, REC, WTR; 12004-004-ALT, MIN, SOC, REC, TRV, AIR; 12004-005-RLT, REC, WSR, WTR, CON; 12004-006-PRC, ALT, CON, TRV; 12004-007-PLC, ALT, TRV; 12004-008-ACC, PLC, TRV, REC; 12004-009-WSR, CON, ALT, WTR, PRC; 12004-010-ALT, REC, WTR; 12004-011-ALT, MIN, TRV, REC, WTR; 12004-012-ALT, AIR, TRV, MIN, OIL, RNW, FWL, WTR, REC; 12004-013-ALT, WTR, REC, PRC, CON; 12004-014-TRV
Narricci	Bob	Eagle County, Board of Commissioners	013	013-001-ALT, PRC, PLC; 013-002-ALT-WSR, WTR, REC, PLC; 013-003-ALT, REC, PLC; 013-004-ALT, REC, TRV, AIR, CUM, PRC, PLC; 013-005-PLC, TRV, TRN, PRC, REC, WSR, WTR, CUM; 013-006-ALT, PRC, WTR, PLC, TRN, REC, CUM; 013-007-ALT, REC, PLC; 013-008-ALT, AIR, MIN, OIL, FWL, VEG, REC, TRV, PLC; 013-009-ALT, REC, PRC, PLC, WTR, CUM
Mercer	Vola	Garfield County	11607	11607-001-PRC, CON, ALT; 11607-002-PRC, ALT; 11607-003-RLT, PRC; 11607-004-OIL, SOC, REC, ACC, WSA, LWC, FWL; 11607-005-MIN; 11607-006-MIN, ALT; 11607-007-MIN, MIN, ALT, SOC; 11607-008-AIR, PRC; 11607-009-PHS, AIR, PRC; 11607-010-PRC, ALT, AIR, MIN, OIL, SOC, PLC; 11607-011-ALT, FOR, SOC; 11607-012-GRZ, ALT, SOC; 11607-013-ALT, REC; 11607-014-ALT, REC, PLC; 11607-015-PLC, REC, TRV; 11607-016-TRV, REC; 11607-017-TRV, ALT, REC, TRN; 11607-018-VIS; 11607-019-ACC, ALT, PLC, MIN, OIL, RLT, TRV, SOI, VIS; 11607-020-TRV, ALT, FWL; 11607-021-LWC, ALT, PLC, OIL; 11607-022-WSR, PLC; 11607-023-SOC, PRC, OIL, MIN; 11607-024-SOC, ALT; 11607-025-SOC; 11607-026-SOC, MIN, OIL, PRC; 11607-027-SOC, ALT; 11607-028-ALT, SOC, MIN, OIL, AIT, TRN; 11607-029-OIL, MIN, SOC; 11607-030-SOC, PRC; 11607-031-ALT, SOC, REC, PRC

**Table V-2**  
**List of Agency Commenters on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Agency</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Newberry	James	Grand County, Board of Commissioners	12000	12000-001-PRC; 12000-002-ALT, CON, WSR, WTR; 12000-003-PRC; 12000-004-SOC, GRZ; 12000-005-REC, PLC, MIN, OIL; 12000-006-TRV, TRN, GRZ, FOR, REC, PLC, CON; 12000-007-TRN, SOC; 12000-008-OIL, MIN, SOC, GRZ, FWL, SSS; 12000-009-WTR, GRZ, FWL, SOC, PLC, OIL, MIN
Frasier	Linda	Mesa County, Commissioners	11429	11429-001-CON; 11429-002-ALT, SOC; 11429-003-SOC, PLC, RNW, OIL, REC, GRZ, FOR, ALT; 11429-004-SOC, OIL, ALT; 11429-005-SOC, OIL, SSS, LWC, ACC, SOI, WSR, REC, FWL, PRC, MIN; 11429-006-SOC, OIL, ALT; 11429-007-SOC, OIL, ALT; 11429-008-OIL, ALT; 11429-010-SOC, PRC; 11429-011-PRC, OIL, SOC, ALT; 11429-012-OIL, MIN, SOC; 11429-013-ALT, OIL; 11429-014-OIL; 11429-015-AIR, SOC, OIL; 11429-016-SOC, OIL, ALT; 11429-017-SOC, OIL, PRC; 11429-018-OIL, PHS, SOC; 11429-019-SOC, OIL, ALT, CUM; 11429-020-PRC, CON; 11429-021-PRC, ALT, SOC, FWL, WTR; 11429-022-WTR, LWC, ACC, OIL; 11429-023-PRC, SOC; 11429-024-TRV; 11429-025-PRC, CON

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Last Name First Name		Agency	Letter ID Code	Comment ID Codes
Meis	Craig	Mesa County	1900	1900-001-PRC; 1900-002-ALT, SOC; 1900-003-SOC, ALT; 1900-004-OIL, SOC, ALT; 1900-005-OIL, SOC; 1900-006-OIL, ACC, FWL, SOC, MIN; 1900-007-SOC, OIL, PLC; 1900-008-PRC, SOC, OIL; 1900-009-OIL, MIN, SOC; 1900-010-OIL, SOC, ALT; 1900-011-OIL, CUM, MIN; 1900-012-OIL, MIN, ALT, RLT; 1900-013-OIL, SOC; 1900-014-SOC; 1900-015-OIL, SOC; 1900-016-OIL, RLT, SOC; 1900-017-ALT, RLT, MIN; 1900-018-OIL, SOC; 1900-019-AIR, OIL; 1900-020-SOC, ALT, OIL; 1900-021-SOC; 1900-022-PHS, OIL; 1900-023-MIN, SOC, OIL; 1900-024-SOC; 1900-025-SOC, OIL; 1900-026-SOC, SOC, OIL; 1900-027-RNW; 1900-028-SOC; 1900-029-SOC; 1900-030-SOC; 1900-031-SOC, OIL; 1900-032-ALT, SOC; 1900-033-ALT, OIL; 1900-034-CUM, SOC; 1900-035-ALT, SOC, OIL; 1900-036-SOC; 1900-037-PRC, SOC, ALT; 1900-038-LWC, ACC; 1900-039-SOC; 1900-040-TRV; 1900-041-PRC
Anderson	Charlotte	Pitkin County, Board of County Commissioners	11611	11611-001-PRC; 11611-002-SOC, PRC, FWL, SSS, CON, PLC; 11611-003-PLC; 11611-004-REC, FWL; 11611-005-OIL, PLC, PRC; 11611-006-OIL, SOC, PRC; 11611-007-CON, PLC; 11611-008-PRC, CON; 11611-009-PRC, CON; 11611-010-REC, ACC, PRC, FWL, OIL, MIN; 11611-011-PRC, CON, OIL, MIN; 11611-012-TRN; 11611-013-VIS, REC, ACC, SOC; 11611-014-SOC, REC; 11611-016-TRV, REC, RLT, SOC; 11611-017-REC, FWL, WTR, AIR, ALT, PRC, SOC; 11611-018-AIR, PRC; 11611-019-SOC, REC, TRV; 11611-020-RLT; 11611-021-PLC, PRC, FWL, VEG, REC, GRZ; 11611-022-MIN, RLT, PRC; 11611-023-TRV, PRC; 11611-024-PLC, REC, CON; 11611-025-ALT, SOC, PRC; 11611-026-PLC, PRC, SOC; 11611-027-PLC, CON, PRC; 11611-028-PRC; 11611-029-FWL; 11611-030-TRN; 11611-031-ALT, REC; 11611-032-PLC, FWL, TRV, REC, PRC; 11611-033-ALT, FWL, PLC, WTR; 11611-034-VIS, ALT, PRC;

**Table V-2**  
**List of Agency Commenters on the Draft RMP/Draft EIS**

Agency		Letter ID	Comment ID Codes
Last Name	First Name	Code	
continued		11611	11611-035-FOR, ALT, ACC, FWL; 11611-036-ALT, GRZ; 11611-037- RLT, PRC, PLC; 11611-038-ALT, RLT, PRC; 11611-039-PHS; 11611- 040-WFM; 11611-041-PHS, OIL, MIN; 11611-042-PHS, OIL, MIN, PRC; 11611-043-AIR, PRC, PLC; 11611-044-AIR, PLC, PRC, OIL, MIN; 11611-045-CUM, AIR; 11611- 046-AIR, OIL, MIN; 11611-047-AIR; 11611-048-AIR, PRC; 11611-049- WTR, OIL, MIN; 11611-050-CLC, VEG, MIN; 11611-051-TRV, PRC; 11611-052-TRV, ALT, PLC; 11611- 053-PLC, REC; 11611-054-REC, FWL, PRC, PLC; 11611-055-TRN, REC, TRV; 11611-056-RLT; 11611- 057-TRN, TRV; 11611-058-WSA, PLC, LWC, FWL, VIS; 11611-059- PLC, TRN, TRV, REC, WSA, RLT; 11611-060-RLT, REC, TRV, PLC; 11611-061-RLT, REC, TRN, TRV, PLC; 11611-062-RLT, FWL, PLC; 11611-063-PLC, RLT, REC, FWL; 11611-064-RLT, TRV, REC; 11611- 065-REC; 11611-066-PLC, REC, FWL, PRC, TRV; 11611-067-REC, TRV, RLT, PLC; 11611-068-PLC, TRN; 11611-069-PLC, PRC; 11611- 070-PLC, REC; 11611-071-PLC, ALT, PRC; 11611-072-PLC, REC, TRV, FWL, PRC; 11611-073-PLC, ACC; 11611-074-PLC, FWL, PRC, REC; 11611-075-TRV, ALT, PLC; 11611-076-TRN, PLC, REC, TRV; 11611-077-TRV, REC, PLC, PRC; 11611-078-PLC, PRC; 11611-079- PLC, RLT, GRZ, FWL; 11611-080- REC, PLC, TRV; 11611-081-PLC, TRV, REC, FWL; 11611-082-PLC, ALT; 11611-083-WSR, ALT; 11611- 084-ALT, TRV; 11611-085-PLC; 11611-086-OIL, MIN, SOC; 11611- 087-OIL, MIN; 11611-088-AIR, OIL, MIN, PHS; 11611-089-CUM, AIR; 11611-090-AIR; 11611-091-CLC; 11611-092-MIN, RLT, PLC, PRC, CON; 11611-093-OIL, MIN, CON, PRC; 11611-094-PHS, OIL, MIN, ALT; 11611-095-PHS, OIL, MIN, SOC; 11611-096-AIR, ALT, OIL, MIN, PRC; 11611-097-PRC, OIL; 11611-098-OIL, ALT, WTR, FWL, SOC, LWC, AIR;

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**List of Agency Commenters on the Draft RMP/Draft EIS**

Last Name First Name		Agency	Letter ID Code	Comment ID Codes
continued			11611	11611-099-MIN, OIL, ALT; 11611-100-ACC, OIL, MIN, ALT; 11611-101-WSA, MIN, OIL, ALT; 11611-102-LWC, MIN, OIL, RNW; 11611-103-AIR, PRC; 11611-104-AIR, PRC, ALT; 11611-105-AIR, OIL, MIN; 11611-106-AIR, PHS; 11611-107-AIR, VEG; 11611-108-AIR; 11611-109-AIR, OIL, MIN; 11611-110-AIR, PHS, ALT; 11611-111-AIR- CON, OIL, MIN; 11611-112-AIR; 11611-113-AIR, OIL, MIN; 11611-114-AIR; 11611-115-AIR, PHS, ALT; 11611-116-AIR, PRC, PHS; 11611-117-AIR, OIL, MIN, TRN; 11611-118-AIR, ALT, PHS, OIL, MIN, CUM; 11611-119-AIR, VIS, OIL, MIN; 11611-120-AIR, PRC, VIS; 11611-121-AIR, OIL, MIN, ALT; 11611-122-CUM, AIR, OIL, MIN; 11611-123-AIR; 11611-124-AIR, ALT; 11611-125-AIR, CUM; 11611-126-AIR, PRC, PHS; 11611-127-AIR; 11611-128-AIR, CUM, VIS; 11611-129-AIR, VIS, PRC; 11611-130-AIR; 11611-131-AIR, CUM; 11611-132-AIR; 11611-133-AIR; 11611-134-AIR, OIL, MIN; 11611-135-AIR, ALT, TRN; 11611-136-AIR, TRN, OIL, MIN; 11611-137-AIR, ALT, TRN; 11611-138-AIR; 11611-139-AIR, CUM, OIL, MIN; 11611-140-AIR, ALT, OIL, MIN; 11611-141-AIR, CUM, OIL, MIN, ALT; 11611-142-AIR, VIS; 11611-143-AIR, PHS; 11611-144-CLC, AIR, ALT, OIL, MIN; 11611-145-AIR, CLC, PHS, OIL, MIN; 11611-146-AIR, CLC, OIL, MIN, ALT; 11611-147-AIR, CLC, ALT; 11611-148-AIR, ALT, PRC, OIL, MIN, CLC; 11611-149-AIR, PRC, PHS, OIL, MIN

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Kitzmann	Kathy	Aurora, City of, Water Department	11609	11609-001-PRC, CON; 11609-016-WTR, REC, PRC; 11609-023-ALT, PRC; 11609-022-CUM; 11609-021-WTR, PRC; 11609-020-WTR, REC, PRC; 11609-009-WTR, PRC; 11609-019-ALT, PRC, WTR, SOC, REC; 11609-018-WTR, REC; 11609-017-WTR, REC; 11609-005-WTR, PRC, REC, MIN, OIL; 11609-002-WTR, WSR; 11609-011-CON, PRC, WTR; 11609-004-WSR, WTR, PRC, CON; 11609-015-REC; 11609-006-WTR, PRC; 11609-007-WTR, CON, PRC; 11609-008-WTR, PRC, ALT, REC; 11609-010-RLT, WTR, ALT, PRC; 11609-012-ALT, REC, WTR, PRC; 11609-013-ALT; 11609-014-CLC, PRC; 11609-003-ALT, WSR, WTR
Duroux	Leroy	Basalt, Mayor of Town of	1709	1709-001-CON; 1709-002-TRV, REC, FWL; 1709-003-PLC, CON, PRC, SOC, ALT; 1709-004-ALT, PLC, CON, SOC; 1709-005-ALT, PLC, TRV, CON, REC, GRZ, FWL, SOC; 1709-006-ALT, PLC, TRV, REC, FWL, CON, SOC; 1709-007-PLC, PRC; 1709-008-ALT, PLC, REC, TRV; 1709-009-PLC, ALT, TRV, REC; 1709-010-PLC, ALT, REC, TRV, CON; 1709-011-PLC, ALT, REC, TRV, CON; 1709-012-PLC, ALT, REC, TRV, CON; 1709-014-PLC, ALT, REC, TRV, CON; 1709-015-PLC, ALT, REC, TRV, CON; 1709-016-PLC, ALT, REC, TRV, CON; 1709-017-PLC, ALT, REC, TRV, CON; 1709-018-PLC, ALT, REC, TRV, CON; 1709-019-PLC, ALT, REC, TRV, CON, FWL; 1709-020-PLC, ALT, REC; 1709-021-PLC, ALT, FWL, VIS, GRZ, REC, PRC, SOC, CON, TRV; 1709-022-RLT, WTR; 1709-024-PRC, TRV, RLT; 1709-025-PRC, TRV, RLT, ALT

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Philip	Susan	Basalt, Town of	11615	11615-001-PRC; 11615-014-ALT; 11615-007-ALT, TRV, REC, RLT, CON, PLC; 11615-013-CON, TRV; 11615-012-PRC, PLC; 11615-009- REC, PLC, FWL, ACC, TRV; 11615- 010-RLT, PLC; 11615-008-PLC, GRZ; 11615-006-ALT, TRV, REC, PLC; 11615-002-PLC; 11615-011- WTR; 11615-003-PLC, PRC, CON, REC, GRZ, FWL, TRV; 11615-005- PRC, CON; 11615-004-TRV, PRC, REC, FWL, CON
Staight	John	Eagle, Town of	11606	11606-001-CON, ALT, TRV, FWL, SSS, PLC; 11606-002-PRC, PLC; 11606-003-REC, TRV; 11606-004- SSS, FWL, VEG; 11606-005-FWL; 11606-005-TRV; 11606-006-TRV, REC, PLC; 11606-007-PLC, TRV, REC, TRN; 11606-008-TRV, REC, PLC; 11606-009-ALT, TRV, REC, PLC; 11606-010-ALT, REC, PLC; 11606-011-ALT, FWL, PLC; 11606- 012-ALT, PLC, SSS, ACC, TRV, REC; 11606-013-ALT, GRZ, FWL; 11606-014-VEG, GRZ, ACC, SSS; 11606-015-WFM, ALT; 11606-016- VEG, ALT; 11606-017-ALT, MIN, OIL; 11606-018-PLC, MIN, OIL, REC, VIS; 11606-019-ALT, MIN, REC; 11606-020-ALT, SOI, TRV, WTR; 11606-021-VIS, ALT, PLC, ACC; 11606-022-RLT, REC
Moore	David	Silt, Mayor of Town of	1708	1708-001-CON, ALT, SOC, PLC; 1708-002-ALT, SOC, REC, GRZ, PRC, PLC; 1708-003-PRC, SOC, PLC; 1708-004-PLC, ALT, PRC, SOC; 1708-005-PLC, ALT, CLC, SOC, SOC, PRC; 1708-006-PLC, RNW, MIN, OIL, SOC, ALT



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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
A?	Aaron?		1049	1049-001-OIL, SOC; 1049-002-OIL, AIR, SOC; 1049-003-OIL, SOC, PLC; 1049-004-OIL, PRC; 1049-005-OIL, SOC, ALT
A?	Cory		12041	12041-001-PRC; 12041-002-PLC, OIL, MIN, SOC; 12041-003-OIL, MIN, ALT, PLC, SOC
Abbott	Ted and Merete		13209	13209-001- REC, TRN, CON, ALT
Abernathy	Craig		1322	1322-001-MIN, OIL, SOC; 1400-001-PRC, SOC
Adams	Scott		1241	1241-001-SOC, OIL; 1241-002-PHS; 1241-003-FWL; 1241-004-SOC, ALT; 1241-005-SOC, PRC, SOC; 1241-006-RLT; 1241-007-ALT, PRC
Adams	Tripp	Citizens Group, Thompson Divide Coalition	11409	11409-001-PLC, FWL, OIL; 11409-002-ALT, PLC, WTR, FWL; 11409-003-ALT, PLC, AIR, OIL; 11409-004-ALT, PLC, OIL, REC, GRZ, SOC; 11409-005-ALT, PLC, OIL, WTR, SOC, TRV; 11409-006-ALT, PLC, FWL, WTR, VEG; 11409-007-OIL, FWL, AIR, WTR, REC, GRZ, ALT, PLC
Adams	Brian		11924	11924-001-OIL, SOC
Adamson	Kenny		11972	11972-001-PRC; 11972-002-AIR, SOC; 11972-003-AIR, SOC, PHS, OIL; 11972-004-AIR, SCO
Adee	Brian		11256	11256-001-PRC, REC, TRV, SOC; 11256-002-ALT; 11256-003-FWL, PRC, SOC, REC
Ainsworth	Jeremy		1922	1922-001-REC, TRN
Alberino	Caroline		8	008-001-PLC, WTR; 008-002- OIL, ALT
Alburn	Cary		1250	1250-001-REC, ALT, PRC, SOC; 1250-002-REC, PLC; 1250-003-PLC, REC; 1250-004-REC, ALT, PRC, SOC; 1250-005-CON
Alderson	George and Frances		11439	11439-001-REC, SOC; 11439-002-PRC, ALT, OIL, WSA, FWL, VIS; 11439-003-PRC, ALT, OIL; 11439-004-PRC, CON, WSA, LWC; 11439-005-REC, TRV; 11439-006-ALT, REC, TRV; 11439-007-ACC, ALT; 11439-008-WSR, REC, SOC
Aldrian	Charles		1904	1904-001-TRN, REC; 1904-002-TRN, REC, PLC
Allen	Barabra		30	030-001-LWC, WSA, PRC, ALT; 030-002-PLC
Allen	Barbara		1600	1600-001-LWC, WSA; 1600-002-PLC

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Alvis	Daniel		11361	11361-001-PLC, ALT, REC, TRV; 11361-002-PLC, RLT, VIS; 11361-003-REC, TRV, VIS; 11361-004-REC, TRV, PRC, SOC
Anchando	Alex		1130	1130-001-OIL
Anderson	Jessi		1401	1401-001-PRC; 1401-002-AIR; 1401-003-OIL
Anderson	Mark		11205	11205-001-PRC, TRV, REC
Anderson	Corbett		13212	13212-001- PLC, REC, PRC, OIL; 13212-002- PLC, REC, SOC, ALT; 13212-003- TRV, PLC, REC, FWL, ALT; 13212-004- PLC, REC, TRV, OIL, FWL, ALT
Andl	Otto	Colorado River Center	11534	11534-001-REC, ALT, PLC; 11534-002-REC, ALT, SOC, PLC
Antonill	Lori		1403	1403-001-OIL, AIR, SOC; 1403-002-PRC; 1403-003-OIL, SOC, ALT
Armano	Kara		11357	11357-001-PRC, PLC, ALT, REC, TRV; 11357-002-MIN, OIL, REC; 11357-003-PRC
Armano	Kara		17028	17028-001-WTR, FWL, SSS; 17028-002-AIR, OIL; 17028-003-PLC, ALT, FWL, OIL
Arreola	Luis		11946	11946-001-OIL, AIR; 11946-002-OIL, ALT, WTR, FWL, SSS; 11946-003-ALT
Arthur	Tom		13107	13107-001-REC, SOC, TRN; 13107-002-REC, PLC, TRN
Ashcraft	Tamela		1243	1243-001-PRC, CON; 1243-002-SOC, PRC, CON
Ashlock	Tom		12022	12022-001-OIL, MIN, SOC
Austin	Allison		11622	11622-001-ALT; 11622-002-PLC, OIL, MIN, PRC; 11622-003-SOC, TRN, WTR, OIL, MIN, PRC; 11622-004-PRC; 11622-005-REC; 11622-006-OIL; 11622-007-ALT
Avalos	Elias		12053	12053-001-OIL, MIN, WTR; 12053-002-OIL, MIN, SOC, PRC
Avator?	Adam		11905	11905-001-SOC, PRC; 11905-002-OIL, SOC; 11905-003-AIR
Back	Kevin		1128	1128-001-FWL, SSS, ALT; 1128-002-FWL, SSS, ACC, ALT
Bahn	William		11397	11397-001-SOC, TRN, REC, PLC; 11397-002-REC, TRV
Bailey	Jim		1052	1052-001-OIL, PRC; 1052-002-ALT, OIL, SOC; 1052-003-OIL, PRC, CON
Baker	Jason		11443	11443-001-REC, TRN, SOC, PLC, PHS, SOC
Baker	Gene		11971	11971-001-AIR, SOC; 11971-002-AIR, CON, SOC, OIL; 11971-003-AIR, CON, SOC, OIL

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Balcomb	Scott	Possum Creek, LLC	13216	13216-001- PLC, PRC, SOC; 13216-002- PLC, PRC, GRZ, SOC, VEG, PHS, TRN; 13216-003- ALT, PLC, TRN
Baler	Gene		12072	12072-001-OIL, MIN, ALT; 12072-002-PRC, CON, OIL, MIN
Ball	Spencer	Rocky Mountain Sport Riders	11431	11431-001-PRC, CON; 11431-002-REC, ALT; 11431-003-REC, TRV; 11431-004-TRV, REC, SOC; 11431-005-CON, TRV, REC; 11431-006-REC, TRV; 11431-007-PLC, TRV, REC; 11431-008-PLC, REC, TRV; 11431-009-PLC, REC, TRV; 11431-010-PLC, TRV, REC; 11431-011-PLC, TRV, REC; 11431-012-ALT, PLC, REC, TRV, SOC, PHS; 11431-013-PLC, TRV, REC; 11431-014-PLC, TRV, REC; 11431-015-REC, TRV, SOC, WTR; 11431-016-PLC, REC, SOC, TRV; 11431-017-REC, TRV; 11431-018-TRV, REC; 11431-019-REC; 11431-020-REC; 11431-021-TRV, REC, PLC; 11431-022-REC, SOC; 11431-023-TRV, PLC, REC; 11431-024-REC, TRV; 11431-025-REC, SOC; 11431-026-REC, SOC; 11431-027-TRV, REC; 11431-028-REC, SOC; 11431-029-REC, TRV; 11431-030-REC, SOC; 11431-031-REC, SOC; 11431-032-REC; 11431-033-REC, TRV; 11431-034-REC, TRV; 11431-035-ALT, REC; 11431-036-REC, TRV; 11431-037-REC, SOC; 11431-038-TRV, REC; 11431-039-REC, SOC; 11431-040-REC; 11431-041-REC; 11431-042-REC; 11431-043-REC, SOC; 11431-044-REC; 11431-045-REC, SOC; 11431-046-REC; 11431-047-SOC, FWL; 11431-048-REC, TRV; 11431-049-PRC, TRV; 11431-050-TRV, REC; 11431-051-REC, TRV; 11431-052-TRV, REC; 11431-053-TRV, REC; 11431-054-RLT; 11431-055-REC, TRV; 11431-056-REC; 11431-057-REC, WSA; 11431-058-TRV, REC, SOC; 11431-059-SOC; 11431-060-SOC, REC; 11431-061-REC, CON; 11431-062-REC, PLC; 11431-063-RLT; 11431-064-TRV; 11431-065-PRC; 11431-066-RLT; 11431-067-REC, TRV, SOC; 11431-068-REC, TRV; 11431-069-TRV, SOC, REC; 11431-070-REC; 11431-071-REC;

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
continued			11431	11431-072-REC, SOC; 11431-073-REC; 11431-074-REC, SOC; 11431-075-REC, RLT; 11431-076-REC; 11431-077-REC, TRV; 11431-078-PLC, REC
Ball	Spencer	RMSR	11663	11663-001-TRV, REC, PLC
Ball	Spencer	Rocky Mountain Sport Riders	12048	12048-001-ALT; 12048-002-REC, TRV, SOC; 12048-003-TRV, CON; 12048-004-PRC, TRV, REC; 12048-005-PLC, TRV, REC, TRN; 12048-006-PLC, TRV, REC, WTR; 12048-007-PLC, TRV, REC, WTR, TRN; 12048-008-PLC, TRV, REC, CON; 12048-009-PLC, REC, TRV, SOC; 12048-010-PLC, TRV, REC, TRN; 12048-011-PLC, TRV, REC; 12048-012-REC, TRV, SOC, WTR, SOI, PRC; 12048-013-PRC, CON
Ballard	Katharina		1242	1242-001-PRC, SOC; 1242-002- SOC, ALT, OIL, RNW, PHS; 1242-003-AIR, CON, PRC; 1242-004-ALT
Ballard	Wally		13403	13403-001-PRC, OIL, MIN; 13403-002-OIL, SOC
Bank	Amanda		4	004-001-PLC, PRC
Bankert	Wayne	Laramie Energy	11425	11425-001-PRC; 11425-002-PRC; 11425-003-PRC; 11425-004-SOC, OIL, ALT; 11425-005-SOC, ALT, OIL, PRC; 11425-006-SOC, OIL, ALT; 11425-007-OIL, ALT, SOC; 11425-008-PRC, OIL; 11425-009-AIR, OIL, PHS; 11425-010-OIL, ALT, VIS
Barber	Joseph		17012	17012-001-REC, TRN, SCO
Barbo	Walter		1937	1937-001-REC, TRN, PLC
Barnes	John		11937	11937-001-OIL, SOC, RLT
Barnes	Michael		13203	13203-001-PLC, ALT, PRC; 13203-002-WTR, REC, GRZ, OIL, WTR, ALT, PRC, SOC; 13203-003-PLC, ALT, PRC, SOC, OIL, TRN; 13203-004-OIL, PHS, ALT, PRC, SCO
Barnes	Clint		15005	15005-001-OIL, SOC
Barry	Russ		11623	11623-001-TRN
Barth	Michael		12054	12054-001-OIL, MIN; 12054-002-OIL, MIN, AIR, PRC; 12054-003-OIL, MIN
Basalt	JG		11537	11537-001-REC, PLC, FWL
Bates	Jeff	Grand Mesa Jeep Club	11370	11370-001-ALT, REC, TRV; 11370-002-ALT, PRC, REC, TRV; 11370-003-SOC, TRV, REC; 11370-004-REC, TRV, PRC; 11370-005-TRV, VEG, FWL; 11370-006-PRC, TRV, REC; 11370-007-PRC, ALT
Bates	Jeff	Grand Mesa Jeep Club	11512	11512-001-PLC, TRV, REC, ALT, SOC

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

Last Name First Name		Organization	Letter ID Code	Comment ID Codes
Bates	Jeff		11515	11515-001-ALT, TRV, REC; 11515-002-ALT, REC, PRC, SOC, TRV; 11515-003-ALT, REC, PRC, SOC, TRV; 11515-004-SOC, ALT, PRC, SOC, TRV, REC, CON; 11515-005-ALT, PRC, SOC, TRV, FWL; 11515-006-ALT, PRC, SOC, TRV, FWL; 11515-007-ALT, PRC, SCO
Battista	Dave		11228	11228-001-PRC, ALT, TRV, REC, FWL
Bauer	David		12005	12005-001-AIR, PRC, CON, OIL; 12005-002-PRC, OIL, MIN
Baumann	Mike		11388	11388-001-PLC, TRN, REC
Beck	Tim and Peggy		17119	17119-001-ALT, PLC, REC, TRV
Becker	Dan		11252	11252-001-PRC, REC, TRV, VEG, FWL, LWC, WSA; 11252-002-ALT, PRC, TRV, REC; 11252-003-PRC, LWC, REC, TRV; 11252-004-ALT, REC, TRV, PLC; 11252-005-PRC, OIL, MIN, ACC, LWC; 11252-002-PRC, OIL, MIN
Becker	Bruce		11319	11319-001-PLC, REC; 11319-002-ALT, WSR, PLC, WTR, REC; 11319-003-REC, PLC, ALT; 11319-004-REC, PLC
Beckner	Orrin		11112	11112-001-TRV, REC; 11112-002-PRC; 11112-003-TRV, PRC; 11112-004-TRV, FWL, CAV; 11112-005-ALT; 11112-006-ALT, PRC; 11112-007-TRV, FWL, VEG; 11112-008-PLC, REC, WSA; 11112-009-TRV, REC; 11112-010-PLC, TRV, TRN; 11112-011-LWC, ACC; 11112-012-PRC, FWL
Beecher	Blaine		1061	1061-001-OIL, PRC; 1061-002-OIL, PRC
Beecher	Blaine		1063	1063-001-OIL, PLC, PRC
Beightel	Greg		13305	13305-001-PLC, OIL, FWL, WTR, GRZ, REC
Beiter	Karin and Andrew		13439	13439-001-PRC, OIL, PLC
Belanger-Shugart	Elizabeth		17027	17027-001-PLC, WSA, OIL; 17027-002-OIL, PLC, WSA; 17027-003-WTR, AIR, PLC; 17027-004-PLC, TRN; 17027-005-WSA, OIL, WTR, AIR, FWL, ACC
Bell	Keith		1076	1076-001-OIL, SOC, PLC
Bell	Warren		14065	14065-001-ALT, OIL
Bennett	William and Jeanne		11311	11311-001-PRC, REC
Benshenyi	John		17247	17247-001-PLC
Benton	Bryan		1956	1956-001-REC, ALT, PLC, TRN

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Berelsman	David		1614	1614-001-REC, TRN, ALT; 1614-002-PLC; 1614-003-PHS; 1614-004-REC; 1614-005-CON
Berna	Jim		11967	11967-001-OIL, SOC; 11967-002-OIL, PHS; 11967-003-OIL, SOC, PHS; 11967-004-OIL, SCO
Berrett	Carisa		11933	11933-001-OIL, SOC
Berrett	Brinley		11934	11934-001-OIL, SOC
Berrett	Robert		11936	11936-001-OIL, SOC, PHS
Berry	Mark		11138	11138-001-PRC, TRV, REC
Berryman	Alan	Northern water District	1705	1705-001-PLC, CON, WTR, REC; 1705-002-ALT, WSR, CON, PRC; 1705-003-CON, WSR, PRC, ALT; 1705-004-PLC, REC, WSR, PRC; 1705-005-PLC, WTR, ALT, PRC; 1705-006-CON, FWL, PLC, REC, WTR; 1705-007-WSR, ALT, PRC, SCO
Bette	Lisa		1308	1308-001-OIL, MIN; 1308-002-PRC
Beuter	Karin		11458	11458-001-OIL, PHS, FWL, SOC
Beyer	Al		11421	11421-001-PRC; 11421-002-PRC, REC, FWL, GRZ; 11421-003-PRC, REC, FWL, GRZ, PLC; 11421-004-PRC, REC, PLC, FWL; 11421-005-PLC, FWL, TRV
Biederbeck	Ed		11239	11239-001-PRC, REC, TRV, SOC
Black	Lacey		14000	14000-001-ALT, WTR; 14000-002-REC, SOC, PLC, WTR, SSS; 14000-003-WTR, WSR, ALT; 14000-004-REC, FWL, SOC; 14000-005-PLC, WTR, REC; 14000-006-WTR, ALT, WSR; 14000-007-ACC, ALT, WTR, PLC
Blackburn	R.		11401	11401-001-ALT, PLC, REC, FWL; 11401-002-ALT, PLC, TRN; 11401-003-ALT, PRC, FWL; 11401-004-PRC, TRV; 11401-005-ALT, FWL, REC; 11401-006-PRC; 11401-007-ALT, PRC; 11401-008-PRC, REC, SOC
Blackwell	Jack		1912	1912-001-REC, TRN; 1912-002-REC, TRN, PLC
Bladow	Harry		13124	13124-001-REC, TRN; 13124-002-REC, TRN, SOC, PLC; 13124-003-REC, TRN, PHS
Blair	Mike		11328	11328-001-PRC
Blaney	Karolina		12026	12026-001-OIL, MIN, SOC, PRC
Blaney	Brook		12027	12027-001-OIL, MIN, SOC, PRC
Blangsted	Paul		11116	11116-001-PRC, TRV, REC
Blatt	Jaclyn		11419	11419-001-SOC, PHS
Boese	Steven		14057	14057-001-ALT, FWL, AIR
bombardier	jack	Confluence Casting	26	026-001-REC, PLC; 026-002-REC, PLC; 026-003-REC, PRC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Bone	Cody		1227	1227-001-PRC; 1227-002-AIR; 1227-003-OIL, PRC, SOC; 1227-004-PHS
Bonnell	Daniel		15009	15009-001-OIL, PRC, SOC, ALT
Boone	Kitty		11398	11398-001-ALT, PLC, TRN, REC, TRV, FWL; 11398-002-PRC; 11398-003-ALT, PLC, FWL, REC, TRN, TRV, PRC
Booth	James	Recreational Aviation Foundation and Colorado Pilots Association	1610	1610-001-ALT, TRN, REC; 1610-002-REC, TRN; 1610-003-PHS, TRN; 1610-004-REC, SOC, TRN; 1610-005-REC, TRN
Booth	James		12069	12069-001-PRC; 12069-002-ALT; 12069-003-OIL, MIN, CON
Boyd	Bass		11366	11366-001-PLC, TRV, REC
Boyle	Keith		11142	11142-001-PRC, REC, TRV; 11142-002-SOC, REC, TRV
Bradley	Linda		1312	1312-001-ALT, SOC, OIL, PRC
Bradley	Larry		1313	1313-001-ALT; 1313-002-SSS, FWL; 1313-003-PRC, OIL
Bradley	Damon		11961	11961-001-PHS, OIL; 11961-002-PLC, OIL, PHS
Bradshaw	Kristie		1405	1405-001-OIL, SOC, ALT
Brandon	Cheryl	Citizens Group, Thompson Divide Coalition	17018	17018-001-OIL, TRN, PLC; 17018-002-ALT, PLC
Brandt	Robert		1930	1930-001-REC, ALT, PLC, TRN
Brass	Timothy	Backcountry Hunters and Anglers	11012	11012-001-ALT, REC, WSA, LWC; 11012-002-REC, WSA, FWL, SOC; 11012-003-OIL, FWL, WSA; 112012-004-OIL, ALT, SOC, ACC, WSA, LWC
Breckner	Robin		1418	1418-001-OIL
Brerheass	Tim		12015	12015-001-CUM, OIL, MIN; 12015-002-ALT, OIL, MIN, SOC; 12015-003-PRC, OIL, MIN
Brett	David		1317	1317-001-PRC, OIL, MIN, SOC
Bretz	Ivan		1214	1214-001-SOC; 1214-002-ALT, SCO
Brewer	Larry		1409	1409-001-OIL, SOC; 1409-002-PRC
Bristol	Gary		1957	1957-001-REC, ALT, PLC, TRN
Brooks	Tammy		1205	1205-001-AIR, PHS; 1205-002-AIR, CON; 1205-003-RNW, OIL, SOC; 1205-004-PRC, SOC
Brooks	Gary	Recreational Aviation Foundation and Colorado Pilots Association	1631	1631-001-ALT, REC, TRN; 1631-002-PHS, PLC, REC, TRN; 1631-003-REC, SCO
Brooks	Barry		11122	11122-001-PRC, TRV, REC; 11122-002-REC, TRV; 11122-003-SOC, REC; 11122-004-REC, TRV, PRC
Brown	Pat		1100	1100-01-OIL; 1100-02-OIL, ALT
Brown	Pat		1238	1238-001-ALT, OIL, SCO
Brown	Charlie	Mountain Pedaler	12058	12058-001-TRV, REC, SOC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Brown	Mark	Colorado Pilots Association, Inc.	13401	13401-001-PRC, REC, TRN, SOC; 13401-002-TRN, PLC; 13401-003-ALT, TRN, REC; 13401-004-TRN, REC, PLC; 13401-005-TRN; 13401-006-TRN, REC, PHS, FWL; 13401-007-TRN
Bruce	Peter	General Aviation Manufacturers Association	1947	1947-001-REC, TRN, SOC; 1947-002-REC, TRN, SCO
Bruce	Cynthia		11647	11647-001-PLC, FWL, TRV, REC, TRN
Bryan	Dasa		14005	14005-001-OIL, SOC
Bufkin	Bruce		11260	11260-001-TRV, SOC, PRC
Bugni	Bill		28	028-001-PLC, TRN, TRV
Buirgy	Rob		11262	11262-001-CON, PRC, WTR, REC, TRV, WSR, PLC; 11262-002-PRC, CON; 11262-003-PLC, PRC; 11262-004-PLC, PRC; 11262-005-WSR, PLC, PRC, CON, ALT; 11262-006-CON, PRC, PLC, WTR, REC, TRV
Bullock	Jennifer	Possom Creek Ranch	17250	17250-001-PLC, TRN, RLT, ALT, GRZ
Bunce	Peter	General Aviation Manufacturers Association	16001	16001-001-REC, TRN, SCO
Burger	Frank		1801	1801-001-TRN, REC, SCO
Burgess	Mike		12019	12019-001-OIL, MIN, SOC, AIR, WTR
Burke	Vern		1928	1928-001-REC, TRN, PLC
Burris	Levy		1234	1234-001-SOC; 1234-002- SOC, OIL; 1234-003-SOC, SOC, OIL
Burrows?	Ryan		1028	1028-001-ALT, OIL, SOC; 1028-002-OIL
Burson	Robert		11529	11529-001-REC, TRN, PHS
Byars	Katrina	Citizens Group	3	003-001-PLC; 003-002-OIL; 003-003-SOC; 003-004-WTR, AIR; 003-005-PLC, OIL
Byrd	Chris and Maureen		11453	11453-001-REC
C-	John		1035	1035-001-AIR, CON, SOC, PRC
C?	L?		12067	12067-004-OIL, MIN, PHS, ALT
Cain	Jerome		13136	13136-001-REC, TRN; 13136-002-REC, TRN; 13136-003-REC, TRN, PLC, SOC; 13136-004-REC, TRN
Callen	Melvin and Taylor		13114	13114-001-REC, TRN; 13114-002-REC, TRN, PLC, SCO
Calvino	Harry		13122	13122-001-REC, TRN
Cameron	Vanessa		1505	1505-001-PRC, OIL, MIN, ALT, SOC
Cameron	Scott		11200	11200-001-PRC, TRV, REC, SOC
Campbell	Michael		1938	1938-001-REC, TRV



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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Campbell	Michael		11505	11505-001-REC, ALT; 11505-002-REC, ALT, TRN, PHS; 11505-003-REC, ALT, TRN, PLC, SOC, PRC; 11505-004-REC, PHS, TRN, CON, SCO
Campos	Pedro	Zehren And Associates, Inc. (Eagle County Planning Commission)	12	012-001-TRV, REC, TRN, PLC; 012-002- TRV,REC, PLC; 012-003-TRV, REC, PLC, WTR; 012-004-TRV, REC, PLC; 012-005-TRV, REC, PLC, SOC; 012-006-TRV, REC, SOC, PLC, CON, PRC
Campos	Pedro	Zehren And Associates, Inc. (Eagle County Planning Commission)	18	018-001-PLC, REC, TRV; 018-002-PLC, REC, SOC, PRC
Campos	Juan		11909	11909-001-AIR, WTR, PRC; 11909-002-AIR; 11909-003-OIL
Capplyman	Frank		11943	11943-001-OIL, SOC; 11943-002-OIL, AIR, SOC, PHS; 11943-003-OIL, SOC; 11943-004-OIL, SOC; 11943-005-OIL, SOC; 11943-006-OIL
Cardamone	Tom	Aspen Center for Environmental Studies	36	036-001-TRV, REC, PLC; 036-002-ACC, FWL, REC, TRN, PLC
Carey	Brad		11139	11139-001-PRC, TRV, REC; 11139-002-REC, TRV, PRC, ALT
Carlson	Zach		29	029-001-REC, SOC, PLC; 029-002-PLC, REC, TRV; 029-003-PLC, REC, TRV, ALT
Carter	Bob		1641	1641-001-ALT, REC, TRN, CON; 1641-002-REC, TRN, PLC, ALT; 1641-003-TRN, SOC; 1641-004-PHS, TRN, REC, FWL
Carter	Bob		11015	11015-001-REC, CON, TRN, ALT, PRC, SCO
Carter	Dewayne		11229	11229-001-OIL, MIN, SOC
Carter-Schlendt	Yvonne	Citizens Group, Thompson Divide Coalition	17017	17017-001-PLC, FWL, OIL; 17017-002-ALT, PLC, WTR, FWL; 17017-003-ALT, PLC, AIR, OIL; 17017-004-ALT, PLC, OIL, REC, GRZ, SOC; 17017-005-ALT, PLC, OIL, WTR, SOC, TRV; 17017-006-ALT, PLC, FWL, WTR, VEG; 17017-007-OIL, FWL, AIR, WTR, REC, GRZ, ALT, PLC
Cass	Lynn		14008	14008-001-OIL, SOC
Chamberlain	Todd		1112	1112-001-SOC; 1112-002-SOC; 1112-003-SOC
Chamberlain	Kelly		1224	1224-001-SOC, OIL; 1224-002-ALT, RNW, CON; 1224-003-SOC, REC, SOC, PRC; 1224-004-ALT, WSA; 1224-005-OIL, SOC, SCO
Chandler	Cheryl		1306	1306-001-SOC, MIN, OIL, PRC
Chandler	Norman		1307	1307-001-SOC, MIN, OIL; 1307-002-PRC, CON

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Chandler-Henry	Kathy	Eagle River Watershed Council	11358	11358-001-ALT, PRC, SOC, MIN, WTR, REC; 11358-002-REC, ALT, MIN, SOC; 11358-003-ALT, WSR, PLC; 11358-004-PLC, FWL, VEG; 11358-005-ALT, CON, PRC; 11358-006-ALT, REC, MIN, PRC, SOC; 11358-007-ALT, CON; 11358-008-ALT, WTR, PRC; 11358-009-ALT, MIN, OIL, WTR; 11358-010-WTR; 11358-011-WTR; 11358-012-WTR; 11358-013-OIL, ALT, CON, WSA, PLC; 11358-014-PRC, CON
Charlesworth	Cody		1071	1071-001-ALT, WSA
Cheney	Douglas		17024	17024-001-REC, TRN, PLC, SOC; 17024-002-REC, TRN; 17024-003-REC, TRN, PHS
Chitwood	Brad		1067	1067-001-AIR, PRC
Chlopek	John		1944	1944-001-REC, TRN; 1944-002-REC, TRN, PLC
Christanson	Lin		1958	1958-001-REC, ALT, PLC, TRN
Christiansen	illegible		12006	12006-001-AIR, PRC, CON
Chuljian	David		13117	13117-001-REC, TRN, PHS
Chunugh?	Lay		1211	1211-001-SOC; 1211-002-ALT; 1211-003-ALT, WSA, SOC; 1211-004-SOC, ALT
Claber	Chris		11226	11226-001-REC, TRV, SOC, ALT, PRC
Clark	Kent		1075	1075-001-OIL, SOC, REC
Clark	Josh		11374	11374-001-REC, TRV
Clasen	Norm		13139	13139-001-ALT, REC, GRZ
Clayhold	Don		13130	13130-001-REC, TRN, PHS
Clayton	Creed		11516	11516-001-ATL, FWL, VEG, SSS, OIL; 11516-002-ACC, ALT, FWL, SSS, OIL; 11516-003- ACC, ALT, FWL, SSS, PRC, SOC; 11516-004-ACC, PLC, ALT, VEG, SSS, PRC, SOC; 11516-005- ACC, PLC, ALT, FWL, SSS, PRC, SOC; 11516-006-ACC, PLC, ALT, FWL, SSS, PRC, SOC; 11516-007- OIL, ALT, FWL, SSS, PRC, SOC; 11516-008- OIL, ALT, VEG, GRZ, SSS, FWL, PRC, SOC; 11516-009- FWL, CON, ACC, ALT, PRC, SOC; 11516-010- ALT, FWL, VEG, SSS PRC, SCO
Clifford	Tim		1804	1804-001-SOC, REC, TRV; 1804-002-REC, TRN; 1804-003-PRC, SOC, TRV, REC
Clifford	Karl		13137	13137-001-REC, TRN, SOC; 13137-002-REC, TRN, SOC
Coatsworth	Scott		13119	13119-001-REC, TRN, PLC, SCO

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Cole	Sarah	Citizen's Group, Thompson Divide Coalition	1815	1815-001-PRC, PLM, MIN; 1815-002-ALT; 1815-003-WTR, PLC; 1815-004-AIR, PLC, TRN, OIL, MIN; 1815-005-REC, TRV, PLC, SOC, FWL; 1815-006-MIN, OIL, SOC, WTR, PRC, PLC, TRN; 1815-007-PLC, FWL; 1815-008-OIL, MIN, PRC, PLC, ALT
Coleman	Johnny A.		1012	1012-001-AIR, CON, PRC; 1012-002-OIL, PRC
Coleman	Kane		1024	1024-001-SOC, SOC, PRC, OIL; 1024-002-SOC, OIL
Coleman	Johnny		11474	11474-001-AIR, CON, PRC; 11474-002- OIL, MIN
Colia	J. Carter		11402	11402-001-OIL,SOC
Collett	Colby		1045	1045-001-PLC, OIL, PRC; 1045-002-OIL, SOC, AIR
Collett?			1047	1047-001-PRC; 1047-002-PRC
Collins	Jason		11253	11253-001-OIL, MIN, SOC; 11253-003-PLC, OIL, MIN, SOC; 11253-004-SOC, OIL, MIN; 11253-005-PRC, SOC, OIL, MIN, PLC; 11253-006-PRC, OIL, MIN; 11253-007-OIL, MIN, FWL, CON, PRC
Collins	John	Aircraft Owners and Pilots Association	11422	11422-001-PRC, TRN; 11422-002-TRN, REC; 11422-003-TRN, REC, PHS; 11422-004-TRN, PRC, CON; 11422-005-TRN, PLC, REC; 11422-006-ALT, TRN; 11422-007-TRN, REC; 11422-008-TRN, REC, CON
Collins	Phil		11915	11915-001-OIL, SOC; 11915-002-OIL, SOC
Collins	Paul		13325	13325-001-ALT, REC, TRN; 13325-002-CON, PRC, TRN; 13325-003-REC, TRN, ALT; 13325-004-PLC, ALT, TRN, REC; 13325-005-REC, TRN, ALT; 13325-006-REC, TRN, ALT; 13325-007-REC, TRN, ALT, SOC; 13325-008-REC, ALT, PLC; 13325-009-PLC, REC, TRN, ALT, CON, PRC; 13325-010-PRC, ALT, REC, TRN; 13325-011-CON
Comey	Robert	Roaring Fork Transportation Authority	11601	11601-001-PLC, TRV, CON; 11601-002-TRV, TRN, PRC, CON; 11601-003-FWL, VEG, PRC, PLC; 11601-004-ALT, TRV, PLC, FWL
Comstus	Sue		1429	1429-001-OIL, MIN, SOC
Connejo	Jaun		1228	1228-001-SOC; 1228-002-SOC, OIL; 1228-003-PRC, SOC
Contreras-Hernandez	Daniel		1019	1019-001-RNW, OIL, PRC; 1019-002-ALT, OIL
Contreras-Hernandez	Daniel		11481	11481-001-MIN, OIL, PRC, ALT

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Conway	Nathan		1018	1018-001-AIR, CON, PRC
Conway	Nathan		11480	11480-001-PRC, AIR
Cooly	Pat		1237	1237-001-OIL,SOC; 1237-002-OIL,SOC; 1237-003-SOC, SCO
Coon	Jason		12035	12035-001-ALT, OIL, MIN, SOC
Cooper	Ben		1416	1416-001-PRC; 1416-002-OIL
Corona	Vanessa		11447	11447-001-PRC, PLC, SOC, VIS
Cosh	Ted		1951	1951-001-REC, ALT, PLC, TRN
Costanzo	Kyle		1919	1919-001-REC, PLC, TRV; 1919-002-REC, PLC, VIS; 1919-003-REC, PLC; 1919-004-ALT, REC; 1919-005-REC, SOC
Costanzo	Kyle		11411	11411-001-REC, PLC, ALT, TRV; 11411-002-PLC, REC; 11411-003-PLC, REC; 11411-004-PLC, ALT, REC; 11411-005-SOC
Coty	Kevin		1233	1233-001-PHS; 1233-002-AIR, RNW, SCO
Coty	Kevin		11660	11660-001-PRC, ALT
Counsell	Jon		1618	1618-001-REC, TRN, ALT, PLC
Cox	Jason		11007	11007-001-REC, PLC, SOC, ALT
Crane	Kathy		11324	11324-001-PRC; 11324-002-SOC, PRC
Cravens	Mike		11230	11230-001-TRV, REC, SOC; 11230-002-ALT, PRC
Cravens	Mike		11519	11519-001- REC, ALT, PRC, SOC
Crawford	Jim		1624	1624-001-ALT, REC, TRN; 1624-002-PLC, ALT, REC, TRN; 1624-003-ALT, REC, TRN
Cretti	Clark		11326	11326-001-REC, TRV, PLC
Croskell	Ancil		1710	1710-001-REC, ALT, PLC, TRN
Croskell	Karen		1713	1713-001-REC, ALT, PLC, TRN
Crowther	Christine		1421	1421-001-ALT, OIL, AIR, SOC
Cutler	Edward		13115	13115-001-REC, TRN; 13115-002-REC, TRN, PHS
Cutter	Andrea		11338	11338-001-PLC, REC
D?	B		11904	11904-001-OIL, SOC; 11904-002-OIL, SOC; 11904-003-SOC, ALT; 11904-004-SOC, RNW
Daarud	Richard		11129	11129-001-PRC, TRV, REC
Dake	Chuck		13141	13141-001-REC, TRN, SOC; 13141-002-REC, PHS, TRN
Davis	Doyle		1941	1941-001-REC, TRN, PLC
DeBord	Andy		1805	1805-001-REC, TRN; 1805-002-REC, TRN, PLC, PHS; 1805-003-REC, TRN
Deckard	Ralph		11203	11203-001-PRC
Decke	Brad		12092	12092-001-OIL, MIN, SOC
DeGross	Nic	Aloha Mountain Cyclery	11316	11316-001-PRC, ALT; 11316-002-REC, TRV, ALT, PLC; 11316-003-REC, TRV, SOC; 11316-004-PRC
Dekam	Eric		14024	14024-001-OIL, SOC

**Table V-3**  
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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
DeLisle	Jerry		12021	12021-001-OIL, MIN, PRC, FWL, SOC
Dellmore	Douglas	Recreational Aviation Foundation	1613	1613-001-REC, TRN, PLC, ALT; 1613-002-ALT; 1613-003-REC, SOC
Demers	Greg		1132	1132-001-AIR
Densmore	James		1934	1934-001-REC, TRN, PLC; 1934-002-REC, TRN
DeSanti	Mike		1908	1908-001-REC, ALT, PLC, TRN
Despres	Julie		11376	11376-001-REC, TRV, PLC, SOC
DeVore	Fred		11143	11143-001-PRC, TRN, REC; 11143-002-PLC, PRC, PHS, TRN, REC
Dewey	Mike		1915	1915-001-REC, TRN; 1915-002-REC, TRN, PLC; 1915-003-REC
Dice	Carrie		1500	1500-001-PLC, MIN, OIL, SOC; 1500-002-PRC; 1500-003-AIR, PRC, CON; 1500-004-OIL, MIN
Dick	Lawrence		11202	11202-001-PRC, TRV, REC; 11202-002-ALT, REC, TRV; 11202-003-PRC, REC, TRV
Dickman	Edward		13204	13204-001-TRN, REC, PHS; 13204-002-TRN, REC, PHS; 13204-003-TRN, REC, ALT
Dickson	Tony		11359	11359-001-REC, TRV, PLC; 11359-002-PRC, REC, TRV
Dier	Joseph and Janice		1936	1936-001-REC, TRN, PLC
Dier	Joseph and Janice		11387	11387-001-PLC, TRN, REC, PRC
DiLeo	Jim	State of Colorado Dept. of Public Health and Environment	13324	13324-001-AIR, ALT
Dillard	Andria		11233	11233-001-PRC
DiMarco	Pete		13506	13506-001-OIL, PLC, SOC, ALT, PRC
DiTiffany	Larry		16002	16002-001-AIR, PHS, SOC, SOC; 16002-002-ALT, WSA
Dix	Frank		11330	11330-001-GRZ; 11330-002-GRZ, SOI, VEG; 11330-003-GRZ, VEG, FWL; 11330-004-GRZ, SSS
Donelson	Rondie		1501	1501-001-PRC, OIL, MIN
Dotey	Robert		14053	14053-001-OIL, AIR, PRC; 14053-002-SSS, ALT; 14053-003-PRC
Dotson	Jerry		1607	1607-001-ALT, REC, TRN
Douglass	Aaron	Possum Creek, LLC	13219	13219-001-PLC, ALT; 13219-002-PLC, PHS, TRN
Douglass	Don	Possum Creek, LLC	13220	13220-001-PLC, ALT; 13220-002-PLC, PHS, TRN
Downey	Chuck	Crystal Valley Environmental Protection Association	11513	11513-001-ALT, WTR, RLT, SOC, PRC
Downey	Chuck	Crystal Valley Environmental Protection Association	11513	11513-001-ALT, WTR, RLT, SOC, PRC; 11513-002-ALT, OIL, WSA, SOC, PRC; 11513-003- OIL, PLC, WTR, ALT, SOC, PRC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Doyle	Stephen		11227	11227-001-PRC, TRV, REC, PLC
Driskell	Eric		11114	11114-001-PRC; 11114-002-SOC, PRC; 11114-003-PRC, TRV, REC; 11114-004-CON; 11114-005-ALT, REC, TRN, PRC
Dubin	Jeffery		11394	11394-001-ALT, TRV, TRN, FWL, PRC
Duerr	Sean		1213	1213-001-ALT, CON, SOC; 1213-002-ALT, SOC, RNW; 1213-003-ALT
Dunn	Dirk		11925	11925-001-OIL, SOC
Durie	Mari		12029	12029-001-ALT, OIL, MIN, SOC
Durrie	Michael		14049	14049-001-OIL, ALT
Duryea	Scott		11356	11356-001-REC, TRV; 11356-002-SOC, REC, TRV; 11356-003-TRV, REC, PLC
Dutton	Bob		11130	11130-001-PRC, TRV, REC
Dvezad	Antonio		12089	12089-001-OIL, MIN, SOC
Dye	Charles		12018	12018-001-OIL, MIN, WTR
Dykstra	Stuart		1410	1410-001-OIL, SOC, MIN
Eagal	Dale		14056	14056-001-ALT, OIL, ACC, SSS, SOC
Eaton	Kevin		1064	1064-001-OIL, PRC; 1064-002-OIL, PRC; 1064-003-AIR, PRC
Eckart	Charlie		11312	11312-001-REC, TRV, PLC; 11312-002-ALT, PLC, REC, TRV
Edgeton	Wayne	Rifle Area Mountain Biking Association	13211	13211-001- PLC, REC, ALT, SOC, GRZ, FWL, ALT; 13211-002- ALT,PLC, TRV, REC, GRZ, CON; 13211-003- ALT,PLC, REC; 13211-004- TRV,PLC, REC, ALT; 13211-005- FWL,PLC, REC, ALT, TRV; 13211-006- TRV PLC, REC, ALT; 13211-007- PLC, REC, ALT
Edwards	Pat		1060	1060-001-ALT, FWL, SSS, ACC
Edwards	Grayson		11315	11315-001-PRC, REC
Edwards	Rick		12010	12010-001-SOC, REC, OIL, MIN
Einig	Ken		11135	11135-001-PRC, TRV, REC
Elderkin	Joann		13402	13402-001-ALT, REC, PLC; 13402-002-REC, PLC, PHS, TRV; 13402-003-ALT, REC, TRV; 13402-004- PLC, PRC; 13402-005-PLC, REC, TRV, PHS, FWL, VEG, GRZ, ALT

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Elderkin	Bob		17117	17117-001-PRC; 17117-002-OIL, REC, TRV, PRC; 17117-003-REC, FWL; 17117-004-OIL; 17117-005-REC, TRV; 17117-006-FWL, ALT, REC, TRV, PHS; 17117-007-LWC, PLC, PHS; 17117-008-LWC, PLC, CUL; 17117-010-ALT, FOR, FWL; 17117-011-SOC; 17117-012-OIL; 17117-013-WTR; 17117-014-FOR; 17117-015-VEG; 17117-016-FWL, FOR, PLC; 17117-017-FOR; 17117-018-GRZ; 17117-019-PLC, GRZ; 17117-020-OIL; 17117-021-PRC; 17117-022-WTR, MIN; 17117-023-PLC; 17117-024-PRC, SOC; 17117-025-ALT
Eldridge	Tim		11234	11234-001-TRV, REC, PRC
Elkins	Vicki		15015	15015-001-OIL, MIN, PRC; 15015-002-ALT, ACC, SSS, OIL; 15015-003-PRC, OIL, MIN, SSS
Elting	Elizabeth		1933	1933-001-REC, ALT, PLC, TRN
Emmons	William		1225	1225-001-PLC, CUM, SOC; 1225-002-OIL; 1225-003-CUM, PRC, OIL
Ercanbrack	Janae		11926	11926-001-OIL, SOC
Espino	Tadi-Anne		11923	11923-001-OIL, SOC
Evans	Charlie		11389	11389-001-SOC, TRN, REC
Evans	Shane		13103	13103-001-REC, PLC, TRN, SCO
Ewims?	Roland		1210	1210-001-AIR; 1210-002-ALT
F...?	Jerry		12031	12031-001-ALT, OIL, MIN, SOC
Fair	W. Deal		17022	17022-001-REC, TRN; 17022-002-REC, TRN, PLC, SCO
Fairchild	Sherry		1432	1432-001-SOC, OIL, MIN; 1432-002-CON; 1432-003-SOC, OIL, MIN, PRC
Fancher	Jeremy	International Mountain Bicycling Association	11440	11440-001-PRC, REC, TRV, ALT; 11440-002-REC, TRV, PLC, SOC, PRC; 11440-003-WSA, REC, SOC, PRC; 11440-004-WSA, REC, TRV, SOC; 11440-005-WSA, REC, TRV, PRC; 11440-006-WSA, REC, TRV; 11440-007-PLC, REC, TRV; 11440-008-REC, PLC, TRV, CON; 11440-009-REC, CON, TRV
Farris	Cindy		12023	12023-001-OIL, MIN, AIR, WTR, SOC
Feasel	Ray		12013	12013-001-OIL, MIN, PRC, SOC, PLC
Felice	Wesley		11314	11314-001-PRC, REC
Fellows	Todd		11373	11373-001-REC, TRV, PLC
Fenwick	Haydn		11351	11351-001-PLC, TRV, REC; 11351-002-PRC, REC, TRV

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Fey	Nathan	American Whitewater	13007	13007-001-PRC; 13007-002-REC, WSR, ALT, WTR, CON; 13007-003-PLC, REC, WTR; 13007-004-REC; 13007-005-REC, ALT; 13007-006-REC, ALT, SOC; 13007-007-REC, WTR; 13007-008-REC, ALT; 13007-009-WTR, ALT, REC, PLC; 13007-010-WTR, WSR, PLC; 13007-011-ACC, ALT, PLC, FWR, VEG, WSR; 13007-012-PLC, ALT, WTR; 13007-013-REC, PLC, WTR; 13007-014-REC, WTR; 13007-015-REC, ALT; 13007-016-ALT, REC, WTR; 13007-017-REC; 13007-018-REC, PLC, WTR; 13007-019-ALT, WSR, WTR; 13007-020-ACC, ALT, PLC, FWL, WTR; 13007-021-ALT, PLC, WTR
Fielder	Adrian		17260	17260-001-ALT, PLC, OIL; 17260-002-OIL, PLC, TRN, PHS, FWL; 17260-003-AIR, OIL; 17260-004-OIL, MIN, SOI; 17260-005-FWL, OIL, PLC; 17260-006-TRN, OIL, MIN, PLC; 17260-007-SOC, REC, PLC, OIL; 17260-008-OIL, WTR, SOI, PRC; 17260-009-OIL, MIN, SOC; 17260-010-ALT, LWC, ACC, OIL, PLC, SSS, FWL
Filener	Larry	New Mexico Pilot's Association	1606	1606-001-ALT, REC, SOC, PHS, TRN
Finan	Melanie		5	005-001-OIL, RLT, RNW, CUM; 005-002-FWL, LWC, REC; 005-003-TRN, TRV; 005-004-LWC, WSA; 005-005-ALT, PLC, OIL
Findlay	Michael		11106	11106-001-PRC; 11106-002-PRC, MIN, OIL, SOC; 11106-003-AIR, SOC, PRC; 11106-004-PRC, SOC
Fingel	Charles		1612	1612-001-ALT, REC, TRN, PLC; 1612-002-ALT, REC, TRN, PHS; 1612-003-CON
Fisher	Chris		1223	1223-001-OIL, RLT, ALT; 1223-002-SOC; 1223-003-AIR, SOC; 1223-004-RNW; 1223-005-ALT
Fisher	Rick		11121	11121-001-ALT, SOC, TRV, REC; 11121-002-REC, PRC, TRV; 11121-003-ALT, TRV, REC
Fleming	Peter	Colorado River District	1700	1700-001-ALT, PLC; 1700-002-ALT, WSR, PLC; 1700-003-OIL, PRC, SOC, PLC, WTR, REC; 1700-004-PHS, OIL, WTR
Flores	Sergio		11962	11962-001-OIL, SOC
Floyd	Trevor		11375	11375-001-REC, TRV, PLC
Follari	Pierre		11336	11336-001-PLC, REC, TRV, VEG
Follari	Gemma		11337	11337-001-PLC, TRV, REC



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			Code	
Folmer	Mike		11930	11930-001-OIL, SOC; 11930-002-OIL, SOC
Folmer	Kimberly		11931	11931-001-OIL, SOC
Folmer	Kirstyn		11935	11935-001-OIL, SOC
Forsyth	Neil		11369	11369-001-PLC, TRV, REC
Foster	Paul		1945	1945-001-REC, TRN, PLC
Foster	Justin		11665	11665-001-ALT, REC, PLC, TRV; 11665-002-ALT, REC, TRV, SOI, VIS, FWL; 11665-003-REC, FWL, TRV; 11665-004-ALT, FWL; 11665-005-PRC, OIL
Foster	Justin		13200	13200-001-ALT, PLC, REC; 13200-002-TRV, REC, WTR, PHS, FWL, ALT; 13200-003-TRV, REC, SSS, FWL, ALT; 13200-004-ALT, FWL, OIL
Foster	Tim	Colorado Mesa University	17256	17256-001-PRC, CON; 17256-002-SOC, OIL, MIN, RNW; 17256-003-CON
Fousek	Jakob		11005	11005-001-REC, TRV, ALT, PLC; 11005-002-REC, TRV, WSA, ALT
Foutz	Walt		11014	11014-001-REC, WSA, FWL, ALT, SOC, PRC; 11014-002-WHA, REC, PLC, ALT, PRC, SOC, LWC; 11014-003, ALT, REC; 11014-004-ALT, REC, WSA, TRV, LWC; 11014-005-ALT, REC, PLC; 11014-006-ALT, OIL, PRC, SOC; 11014-007-OIL, PRC, ALT, SOC, ACC, LWC
Fowkes	Jared		1111	1111-001-ALT; 1111-002-REC
Fox-Perry	Judy (and William Perry)		1800	1800-001-PRC; 1800-002-TRV, TRN, REC, PLC, FWL, SOI, ALT; 1800-003-PRC, TRN; 1800-004-PRC, LWC, FWL, WTR, VEG, REC, TRV; 1800-005-REC, TRV, FWL, PRC, VEG; 1800-006-REC, TRV, PLC, SOI, FWL, WTR, PRC; 1800-007-ALT; 1800-008-RLT, PRC; 1800-009-RLT, TRN, TRV; 1800-010-ALT; 1800-011-ACC; 1800-012-ALT; 1800-013-LWC, ALT; 1800-014-ALT; 1800-015-MIN, OIL, PLC, PRC, FWL, VEG; 1800-016-PLC, PRC, OIL, MIN; 1800-017-PLC, VEG, FWL, REC; 1800-018-PLC, TRV, REC, TRN; 1800-019-PLC, GRZ, FWL, REC, SOC, OIL, MIN; 1800-020-PLC, WTR, OIL, MIN; 1800-021-OIL, MIN, PLC, PRC, FWL, WTR, AIR, VEG, SSS, REC, GRZ, ALT; 1800-022-FWL, GRZ, WTR, AIR, REC, TRV, VEG;

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Continued			1800	1800-023-GRZ, SOC, FWL, WTR, VEG, REC, TRV, MIN; 1800-024-ALT; 1800-025-VEG, PRC; 1800-026-OIL, MIN, VEG; 1800-027-ALT; 1800-028-FWL, WTR, SOIL, VEG, REC, GRZ, OIL, MIN; 1800-029-ALT; 1800-030-WTR, PRC; 1800-031-MIN, OIL, PLC, WTR; 1800-032-GRZ, WTR, MIN, OIL, PRC, TRN; 1800-033-WTR, VEG, FWL, GRZ, REC, OIL, MIN, CUL, PRC; 1800-034-ALT; 1800-035-VEG, FWL, REC, TRV, ALT, PRC; 1800-036-OIL, MIN, VEG, FWL, TRN; 1800-037-ALT
Francis	William		1204	1204-001-AIR; 1204-002-AIR, PRC; 1204-003-AIR; 1204-004-AIR
Franklet	Beverly		11391	11391-001-REC, TRN, SOC, PRC
Fraser	Rod		1025	1025-001-OIL, SOC, ALT, AIR, PRC
Freehill	Brooks		14002	14002-001-TRV, REC
Fricke	Wayne		1918	1918-001-REC, TRV; 1918-002-REC, TRV
Froelicher	Franz		11664	11664-001-REC, SOC; 11664-002-OIL, MIN, PHS, AIR, WTR; 11664-003-WTR, OIL, MIN, ALT; 11664-004-RLT
Froelicher	Franz		13201	13201-001-PLC, OIL; 13201-002-OIL, WTR, OIL; 13201-003-ALT, OIL, TRN; 13201-004-ALT, WTR, VEG; 13201-005-RLT
Fuentes	Gabriel		12068	12068-001-PRC, AIR, CON, OIL, MIN; 12068-002-SOC, SOC, PRC; 120669-004-SOC, ALT
Fugate	Todd		11322	11322-001-REC; 11322-002-REC, AIR, PLC, ALT; 11322-003-REC, SOC; 11322-004-REC, TRV, VEG, PLC, PHS; 11322-005-REC, TRV, PLC, AIR; 11322-006-ALT, REC, TRV, PLC; 11322-007-REC, TRV, PLC, PHS, RLT; 11322-008-PLC, REC, TRV, AIR; 11322-009-ALT; 11322-010-PLC, REC, TRV; 11322-011-PLC, REC, TRV, RLT; 11322-012-ALT; 11322-013-PLC, TRV, REC, RLT; 11322-014-PLC, TRV, REC; 11322-015-ALT, TRV, REC; 11322-016-PLC, SOC, TRV, REC, TRN; 11322-017-PLC, REC, TRV; 11322-018-ALT; 11322-019-TRV, PLC

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Fuller	Darryl	Colorado Rocky Mountain School	11020	11020-001-REC; 11020-002-TRV,PLC; 11020-003-ALT, REC, TRV; 11020-004-PLC, REC, SOC; 11020-004-REC, PLC, ALT
Fuller	John and Julie		17004	17004-001-PLC, OIL, WTR; 17004-002-PLC, WTR, OIL; 17004-003-WTR, OIL, PLC
G-	Rennel?		1044	1044-001-ALT, OIL, FWL, SSS
G...?	Ana		11977	11977-001-ALT, LWC, SOC
Gadbois	Thomas		13109	13109-001-REC, TRN; 13109-002-REC, TRN, PLC, SCO
Gage	Chris		11533	11533-001-REC, TRN, SOC
Gallea	William		1807	1807-001-TRV, REC; 1807-002-SOC, TRN, REC, PLC
Garcelon	Gwen	HighLife Unlimited	6	006-001-OIL, LWC; 006-002-SOC, OIL
Garcia	Elvis		11981	11981-001-ALT, SOC, RLT; 11981-002-ALT, ACC, FWL, SSS; 11981-003-WTR, ALT
Garcia	Obed		15014	15014-001-OIL, MIN, SOC, ALT, PRC
Garrard	Ed		1914	1914-001-REC, ALT, PLC, TRN
Garratt	Kyle		13127	13127-001-REC, TRN, SOC, PHS
Garrett	Tony		1634	1634-001-ALT, REC, TRN, PLC; 1634-002-SOC, REC; 1634-003-ALT, REC, TRN; 1634-004-CON
Garrison	Brain		11320	11320-001-REC
Gauthier	Joe		1041	1041-001-OIL, SPC, ALT, SOC, PHS
Geilser	Bradley		11912	11912-001-RLT, ALT, SOC; 11912-002-ALT, OIL; 11912-003-FWL, SSS; 11912-004-OIL
Gendreau	R.M.		1413	1413-001-OIL, PLC, SOC
Genreau	Brent		1303	1303-001-SOC; 1303-002-PRC, PLC; 1303-003-MIN, OIL, SOC, AIR, CON
Gentry	Jason		1065	1065-001-AIR; 1065-002-OIL, PHS; 1065-003-ALT, PRC
Geothe	Jeff		1318	1318-001-MIN, OIL; 1318-002-SOC
Gerber	Clifford		1645	1645-001-ALT, REC, TRN; 1645-002-REC, TRN, SOC; 1645-003-ALT, REC, TRN
Gibbons	Denise		11217	11217-001-TRV, REC, PRC, SOC
Gilliam	Valerie		11354	11354-001-REC, TRV, PLC; 11354-002-PRC

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Gilliam	James		11442	11442-001-PLC, PHS, REC; 11442-002-SOC, REC, WTR, PHS, OIL, AIR; 11442-003-OIL, REC, GRZ, FWL, SOC; 11442-004-ALT, REC, TRV; 11442-005-ALT, REC, PLC, GRZ; 11442-006-ALT, PLC, TRV, OIL; 11442-007-ALT, REC, TRV, PLC; 11442-008-ALT, PLC, TRV, REC; 11442-009-ALT, OIL
Gilstrap	Keith		11907	11907-001-OIL, SOC
Gomez	Irving		1109	1109-001-AIR
Gonzales	Katie		14022	14023-001-OIL, SOC
Gonzalez	Dylan		1506	1506-001-OIL, MIN, SOC
Gooden	Randy		14036	14036-001-PRC
Gorham	Mark		14017	14017-001-OIL, SOC
Gorman	Michael		11648	11648-001-PRC, OIL, MIN; 11648-002-LWC, WSA, OIL, REC; 11648-003-OIL, PRC, ALT; 11648-004-ACC, LWC, OIL, ALT, SSS, FWL, PLC; 11648-005-ALT, REC, FWL, PLC; 11648-005-REC, TRV; 11648-006-WSR; 11648-007-ALT, AIR, OIL, MIN, PHS
Gorton	John		1502	1502-001-PRC, OIL, MIN
Gosnell	Gene		11938	11938-001-OIL, SOC; 11938-002-OIL, AIR, SOC, PHS; 11938-003-OIL, SOC; 11938-004-OIL, SOC; 11938-005-OIL, SOC; 11938-006-OIL
Gould	Don		1102	1102-001-OIL; 1102-002-ALT, AIR; 1102-003-OIL; 1102-004-ALT, SOC
Gracie	Brenda		1435	1435-001-ALT, OIL, MIN; 1435-002-OIL, MIN, PRC, AIR, CON
Grady	James		1639	1639-001-ALT, REC, TRN; 1639-002-PLC, TRN, REC, ALT; 1639-003-REC, TRN, SOC; 1639-004-PHS, TRN, REC; 1639-005-CON
Graham	Jeremy		11344	11344-001-REC, TRV, SOC, PRC, PLC
Granger	Ryan		1078	1078-001-OIL, PLC, SOC; 1078-002-ALT, OIL, SOC
Gray	Jan		15011	15001-001-OIL, MIN, PRC
Greaney	Alysia		11940	11940-001-OIL, SOC; 11940-002-OIL, AIR, SOC, PHS; 11940-003-OIL, SOC; 11940-004-OIL, SOC; 11940-005-OIL, SOC; 11940-006-OIL
Greaney	John		11942	11942-001-OIL, SOC; 11942-002-OIL, AIR, SOC, PHS; 11942-003-OIL, SOC; 11942-004-OIL, SOC; 11942-005-OIL, SOC; 11942-006-OIL

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Green	Cary		11009	11009-001-REC, TRV, FWL; 11009-002-TRV, SOC; 11009-003-CON, PLC, TRV; 11009-004- ALT, PLC, TRV, REC; 11009-005-PLC, REC, ALT, CON, ALT; 11009-006-PLC, REC, TRV, CON; 11009-007-ALT, TRV, PLC; 11009-008-ALT, TRV, PLC; 11009-009-ALT, TRV, PLC, REC; 11009-010-ALT, REC, TRV, PLC, CON; 11009-011-ALT, PRC, SOC, PLC; 11009-012-PRC, SOC, PLC, REC, TRV, ALT; 11009-013-ALT, TRV, PLC; 11009-014-ALT, REC, TRV; 11009-015-PRC, REC, PLC; 11009-016-ALT, PLC, PRC, REC, TRV, CON; 11009-017-PLC, PRC, CON
Green	Robert		12079	12079-001-OIL, MIN, PHS, SOC, AIR, CON, PRC
Green	Lawrence	Balcomb & Green, P.C. on behalf of Elk Meadows Properties, LLC	17254	17254-001-GRZ, TRN, TRV, ALT, PLC; 17254-002-SOC, ALT, PRC; 17254-003-ALT, PRC, PLC, TRN, TRV
Griffith	Zach		11213	11213-001-PRC, TRV, REC, SOC; 11213-002-PRC, REC, TRV; 11213-002-REC, TRV
Grimes	Catherine		11128	11128-001-TRV, REC; 11128-002-TRV, REC, FWL, VEG; 11128-003-PRC, TRV, REC
Grove	Lyle		12008	12008-001-OIL, MIN, PRC
Gu...?	Medardo		11973	11973-001-AIR; 11973-002-AIR, OIL; 11973-003-AIR; 11973-004-AIR, CON; 11973-005-OIL, SOC; 11973-006-AIR, SCO
Guerra	Jorge		12087	12087-001-OIL, MIN, SOC
Guerrero	Luis		11964	11964-001-OIL; 11964-002-PHS, OIL, CON; 11964-003-OIL, SOC; 11964-004-AIR, OIL
Guerrero	Leo		12091	12091-001-OIL, MIN, SOC
Guion	Bob		11399	11399-001-ALT, PLC, TRV, REC, FWL, TRN
Guldi	James		11400	11400-001-TRV, TRN, PLC
Gutierrez	Tirso		12064	12064-001-OIL, MIN, AIR, PHS
Gutmann	Christopher		1623	1623-001-REC, TRN, ALT; 1623-002-SOC; 1623-003-PLC, ALT, REC, TRN, PHS; 1623-004-CON
Haakinson	Derrick		13404	13404-001-PRC, OIL, MIN; 13404-002-OIL, SOC
Haas	Denise		13502	13502-001-REC, PLC, SOC, PRC
Hadland	Lott		11951	11951-001-OIL, SOC; 11951-002-OIL
Hadland	Kay		11955	11955-001-OIL, SOC
Haerle	Wade		11105	11105-001-SOC, OIL, MIN, PRC; 11105-002-PHS, PRC

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Haerle	Wade		11457	11457-001-OIL, SOC
Hafer	Ken		12040	12040-001-PRC, TRV, REC, SOC, MIN
Hagman	Kay		11416	11416-001-PLC, OIL
Haines	Steven	Citizens Group, Thompson Divide Coalition	11410	11410-001-PLC, FWL, OIL; 11410-002-OIL, REC, FWL, WTR, AIR; 11410-003-ALT, FWL, VEG, SOC; 11410-004-ALT, PLC, WTR, FWL; 11410-005-ALT, PLC, AIR, OIL; 11410-006-ALT, PLC, OIL, REC, GRZ, SOC; 11410-007-ALT, PLC, OIL, WTR, SOC, TRV; 11410-008-ALT, PLC, FWL, WTR, VEG; 11410-009-OIL, FWL, AIR, WTR, REC, GRZ, ALT, PLC
Hale	Jon		1005	1005-001-OIL
Hale	Jon		11467	11467-001-PRC, OIL, MIN
Hall	Randy		1235	1235-001-SOC, OIL, SOC, PRC
Hall	Larry		11225	11225-001-TRV, REC, PRC
Hallinan	Bill		11232	11232-001-ALT, TRV, REC; 11232-002-PLC, REC, TRV; 11232-003-TRV, REC, FWL, VEG, PRC
Hamilton	Denise		12056	12056-001-OIL, MIN, SOC; 12056-002-OIL, MIN, AIR; 12056-003-OIL, MIN, SOC
Hammer	Wally		14011	14011-001-OIL, SOC
Hancock	Ken		11136	11136-001-PRC, TRV, REC; 11136-002-ALT, PRC, TRV, REC; 11136-002-TRV, REC
Hanks	Bill and Peggy		1816	1816-001-PLC, PRC, WTR, OIL, MIN; 1816-002-OIL, MIN, SOC; 1816-003-AIR, WTR, FWL; 1816-004-PRC, SOC, FWL
Hansen	Randy	EAA Aviation Center	1955	1955-001-REC, TRN, SCO
Hanson	Lowell		13500	13500-001-REC, PRC, PLC, SCO
Harden	Harry		1903	1903-001-TRN, REC
Harding	Steve		14047	14047-001-OIL, SOC
Harlan	Morgan		1411	1411-001-SOC, CON, AIR
Harman	Kristin		12003	12003-001-OIL, MIN, SOC
Harper	Scott		13100	13100-001-REC, TRN, SOC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Harrington	Tom and Virginia		11441	11441-001-PLC, GRZ, FWL, REC; 11441-002-GRZ, OIL; 11441-003-MIN, GRZ, OIL, WTR, SOC, TRV; 11441-004-OIL, FWL, AIR, WTR, REC, GRZ, SOC, ALT; 11441-005-PRC, AIR, OIL, PHS, WTR; 11441-006-RLT, OIL; 11441-007-GRZ, REC, TRV; 11441-008-TRV, FWL, GRZ, REC; 11441-009-REC, TRV, FWL; 11441-010-ALT, GRZ, RLT, WTR; 11441-011-ALT; 11441-012-ALT, PLC, GRZ, REC, TRV; 11441-013-TRN, PLC, ALT, REC, TRV, SOC; 11441-014-REC, TRV, ALT, VEG; 11441-015-TRN, ALT, REC, WTR, PHS; 11441-016-REC, ALT; 11441-017-PRC
Harris	Alan		11134	11134-001-PRC; 11134-002-PRC, REC, TRV
Harris	John		11251	11251-001-PRC; 11251-002-TRV, REC, LWC; 11251-003-ALT, REC, TRV, PRC; 11251-004-SOC, SOC, TRV, REC, PRC; 11251-005-PRC, TRV, REC, SOC; 11251-006-REC, TRV, PLC SOC, WSA, PRC; 11251-007-PRC, TRV, REC
Harris	Chet		11608	11608-001-TRN, REC; 11608-002-REC, TRN, SOC, PHS; 11608-003-REC, PLC, TRN
Harris	Rob		14023	14023-001-OIL, SOC
Harrison	Alan	WPX Energy	17115	17115-001-PRC, ALT, OIL, MIN; 17115-002-AIR, OIL, ALT; 17115-003-SOI, OIL, ALT; 17115-004-WTR, ALT; 17115-005-VEG, CON, ALT; 17115-006-FWL, ALT; 17115-007-SSS, ALT; 17115-008-CUL; 17115-009-PAL; 17115-010-VIS, ALT; 17115-011-WFM; 17115-012-LWC, ALT; 17115-013-CAV; 17115-014-FOR; 17115-015-GRZ; 17115-016-REC; 17115-017-TRV; 17115-018-RLT; 17115-019-MIN; 17115-020-MIN, OIL, RNW; 17115-021-MIN; 17115-022-ACC, ALT; 17115-023-WSA; 17115-024-WSR, ALT; 17115-025-TRN; 17115-026-PHS; 11717-009-SCO

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Hart	Peter	Wilderness Workshop, submitting on behalf of Wilderness Workshop, The Wilderness Society, Rocky Mountain Wild, Colorado Mountain Club, Biodiversity Conservation Alliance, Western Colorado Congress, Rocky Mountain Recreation Initiative, Natural Resources Defense Council, Colorado Environmental Coalition, Sierra Club, and WildEarth Guardians	11263	11263-001-PRC, PLC, REC, GRZ, SOC, FWL; 11263-002-OIL, PRC; 11263-003-PRC, ALT; 11263-004-PRC, ALT, OIL, REC; 11263-005-FWL, LWC, WSA, ACC, REC; 11263-006-PRC; 11263-007-ALT, LWC, TRV, OIL; 11263-008-WSA; 11263-009-ALT, OIL; 11263-010-ALT, OIL; 11263-010-OIL, CUM; 11263-011-AIR; 11263-011-ALT, OIL, RLT, LWC; 11263-012-PRC; 11263-013-LWC; 11263-013-PRC; 11263-014-LWC; 11263-015-LWC; 11263-016-ALT, LWC; 11263-017-LWC; 11263-018-PLC, LWC; 11263-019-PLC, LWC; 11263-020-PLC, LWC; 11263-021-PLC, LWC; 11263-022-PLC, LWC; 11263-023-PLC, LWC; 11263-024-WSA; 11263-025-ALT, PRC, OIL; 11263-026-OIL, PRC; 11263-027-OIL; 11263-028-OIL; 11263-029-OIL; 11263-030-OIL; 11263-031-OIL; 11263-032-OIL; 11263-033-OIL; 11263-034-OIL; 11263-035-OIL; 11263-036-OIL; 11263-037-OIL; 11263-038-OIL; 11263-039-OIL, PRC; 11263-040-OIL; 11263-041-AIR; 11263-042-AIR; 11263-043-AIR; 11263-044-AIR; 11263-045-AIR, PRC; 11263-046-AIR; 11263-047-AIR; 11263-048-AIR; 11263-049-AIR; 11263-050-AIR; 11263-051-AIR; 11263-052-AIR, PRC; 11263-053-WTR, OIL; 11263-054-WTR, OIL; 11263-055-WTR, OIL; 11263-056-WTR, OIL; 11263-057-WTR, OIL; 11263-058-PRC, OIL; 11263-059-PRC, OIL; 11263-060-PRC, OIL, PHS; 11263-061-PRC, OIL; 11263-062-PRC, OIL; 11263-063-PRC, OIL; 11263-064-PRC, OIL; 11263-065-PRC, OIL; 11263-066-PRC, OIL; 11263-067-PRC, OIL; 11263-068-PRC, OIL, WTR; 11263-069-PRC, OIL, WTR; 11263-070-OIL, WTR; 11263-071-OIL, WTR; 11263-072-OIL; 11263-073-OIL; 11263-074-OIL, WTR; 11263-075-OIL, WTR; 11263-076-OIL, PHS, WTR; 11263-077-OIL, WTR; 11263-078-OIL, PRC, PLC; 11263-079-PLC, PRC, OIL; 11263-080-OIL, REC, WSA, ACC, ALT, WSR, FWL, SSS; 11263-081-OIL;



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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

Last Name First Name		Organization	Letter ID Code	Comment ID Codes
continued			11263	11263-082-MIN, ALT, PRC, AIR, PHS, WTR, FWL, CLC; 11263-083-MIN, PLC, PRC; 11263-084-OIL, WTR, PRC, AIR, CUM, ALT; 11263-085-PRC, OIL, FWL, AIR; 11263-086-PHS, PRC; 11263-087-PHS; 11263-088-PHS, CUM, OIL, PRC, WTR, ALT; 11263-089-PHS, OIL, AIR, WTR; 11263-090-CUM, PHS, PRC, OIL; 11263-091-OIL, PHS, AIR; 11263-092-PHS, OIL, WTR; 11263-093-TRV, REC; 11263-094-ALT, TRV, REC, PRC; 11263-095-TRV, REC, FWL, CUL; 11263-096-AIR, TRN, TRV; 11263-097-AIR, TRN, FWL, TRV, REC; 11263-098-AIR, TRN, TRV; 11263-099-PHS, AIR, TRV, REC, SOI, OIL; 11263-100-PRC, TRV, TRN, RLT; 11263-101-WTR, AIR, ALT, TRV, TRN, PRC; 11263-102-REC, FWL, ALT, PLC; 11263-103-REC, TRV, PLC, TRN; 11263-104-ALT, TRN, TRV, REC, SOI, VEG; 11263-105-FWL, REC, TRV, TRN, ALT; 11263-106-REC, TRV, CUM; 11263-107-REC, PRC, CUM; 11263-108-FWL, CUM, TRN, OIL, PRC; 11263-109-SSS, FWL, OIL; 11263-110-FWL, OIL; 11263-111-FWL, OIL, REC, TRN, CLC, CUM; 11263-112-FWL, REC, CUM, CLC, REC, VEG; 11263-113-FWL, OIL; 11263-114-FWL, OIL; 11263-115-FWL, OIL, MIN, REC; 11263-116-ALT, FWL; 11263-117-FWL, OIL; 11263-118-SSS, CON, ALT; 11263-119-SSS, ACC, ALT, TRN, OIL; 11263-120-SSS; 11263-121-SSS; 11263-122-ACC, SSS, OIL, WTR; 11263-123-SSS; 11263-124-SSS; 11263-125-SSS; 11263-126-SSS; 11263-127-ACC, ALT, PLC; 11263-128-ACC, TRN, TRV, REC, OIL, MIN, RLT, GRZ; 11263-129-WSR, OIL, MIN, ALT, RLT; 11263-130-WSR, PLC; 11263-131-WSR, PLC; 11263-132-WSR, PLC; 11263-133-WSR, PLC; 11263-134-WSR; 11263-135-VIS, ALT, ACC, OIL, LWC; 11263-136-WTR, OIL; 11263-137-WTR, REC, ALT, PHS; 11263-138-CUL, ALT, ACC, LWC; 11263-139-NTS, ALT, OIL, MIN, SOC, VIS, PLC; 11263-140-SOC, REC;

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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

Last Name First Name		Organization	Letter ID Code	Comment ID Codes
continued			11263	11263-141-CLC, CUM, PRC, REC, OIL, TRV; 11263-142-CLC, PRC; 11263-143-CLC, PRC; 11263-144-SOC, REC, ACC, OIL; 11263-145-SOC, PRC; 11263-146-SOC, PRC, OIL, REC, RLT, TRN, TRV; 11263-147-RNW, ACC, LWC, VIS, REC, RLT, ALT, FWL, CUL; 11263-148-WFM, PHS; 11263-149-WFM, PHS, OIL; 11263-150-WFM, PHS, OIL, TRN, SOC; 11263-151-RLT, OIL, MIN, ACC, LWC, WSA; 11263-152-RLT, SSS, FWL, LWC, WTR, WSR, WSA, ACC, REC; 11263-153-CAV; 11263-154-CAV; 11263-155-CAV, MIN, OIL; 11263-156-CAV, FWL; 11263-157-CAV, SSS; 11263-158-CAV; 11263-159-CAV; 11263-160A-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-160B-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-160C-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-160D-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-160E-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-160F-SOI, ALT, OIL, FWL, WTR, TRN, TRV, REC; 11263-161-VEG; 11263-162-AIR, VEG, ALT; 11263-163-VEG; 11263-164-GRZ, OIL, MIN, SOC, CUM, VEG; 11263-165-FOR; 11263-166-FOR; 11263-167-CON; 11263-168-PRC, REC, OIL, WSA, PHS
Hart	Peter	Wilderness Workshop, The Wilderness Society, Rocky Mountain Wild, Colorado Mountain Club, Western Colorado Congress, Natural Resources Defense Council, and Colorado Environmental Coalition	13224	13224-001-SOC, OIL; 13224-002-OIL, SOC, REC, AIR, WTR, FWL, VIS; 13224-003-OIL, SOC; 13224-004-SOC, ALT; 13224-005-OIL, WSA, SOC, REC; 13224-006-SOC, ALT; 13224-007-SOC, REC, PLC; 13224-008-REC, TRV; 13224-009-TRV; 13224-010-PLC, FWL, TRV, REC; 13224-011-TRV, PLC, REC, FWL, SOI; 13224-012-FWL, PLC, TRV; 13224-013-FWL, REC; 13224-014-PLC, REC; 13224-015-PRC, SOC; 13224-016-OIL, AIR; 13224-017-OIL, AIR; 13224-018-WTR, WSR, PLC
Harvey	Susan		11435	11435-001-TRV, PLC, REC, FWL
Harvey	Megan		11445	11445-001-PLC, TRV, FWL, VIS, SOC

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Harvey	Connie		11628	11628-001-PRC; 11628-002-PLC, LWC; 11628-003-FWL; 11628-004-LWC; 11628-005-ALT, PLC, LWC, REC, TRN, TRV; 11628-006-PLC, LWC; 11628-007-TRV, SSS, LWC
Hatter	Shelby		1017	1017-001-AIR; 1017-002-AIR, CON; 1017-003-RNW
Hatter	Shelby		11479	11479-001-AIR, ALT, MIN, OIL, CON, PRC; 11479-002-OIL, MIN
Havens	Douglas		1311	1311-001-PLC, ALT, SOC, OIL, PRC
Hawkins	Mike	Summit County Off Road Riders	11248	11248-002-PRC, TRV, REC; 11248-003-SOC, TRV, REC
Hawn	Marjorie	Western Slope Conservation Alliance	17257	17257-001-PRC, ALT, SOC, OIL
Hawthorne	Brian	Blue Ribbon Coalition	11624	11624-001-REC, TRV; 11624-002-TRV, PRC; 11624-003-PRC, ALT, TRV; 11624-004-PRC, TRV, CUM; 11624-005-PRC, TRV; 11624-006-PRC, CON, TRV, ALT; 11624-007-PRC, REC, TRV; 11624-008-PRC; 11624-009-ALT, PRC, REC, TRV; 11624-010-TRV, REC, SOI, WTR; 11624-011-SOI, WTR, PRC, ALT; 11624-012-GRZ, SOI, WTR, REC, TRV; 11624-013-ALT, CON, ALT, TRV; 11624-014-PRC, CON; 11624-015-REC, TRV; 11624-016-ALT, REC, TRV, PRC; 11624-017-ALT, REC, TRV; 11624-018-PRC, ALT; 11624-019-TRV; 11624-020-TRV, SOC; 11624-021-REC, TRV; 11624-022-TRV, REC; 11624-023-ALT, TRV; 11624-024-TRV, WSA, REC; 11624-025-TRV, ALT, PRC, REC; 11624-026-LWC, ACC, PRC
Hayden	Josh		12046	12046-001-PRC, SOC
Heavers	Tim		13113	13113-001-REC, TRN, PLC
Heede	Rick		11393	11393-001-PLC, TRN, TRV, FWL
Heeter	Jay	Colorado Mountain Club	32	032-001-PLC, LWC, WSA, REC, TRV, ALT; 032-002-REC, TRV, PRC, SOC
Heeter	Jay	Colorado Mountain Club	1602	1602-001-PLC, LWC, WSA; 1602-002-TRV, TRN, SOC

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Heicher	Bill		11448	11448-001-ALT; 11448-002-TRV, FWL, PLC, WTR, VEG, SOI; 11448-010-FWL, PLC, REC, TRV; 11448-011-TRV, PLC, FWL; 11448-012-TRV, PLC, WTR, FWL, REC; 11448-013-PLC, TRV, WTR; 11448-014-REC, TRV; 11448-015-TRV, PLC; 11448-016-PLC, FWL, TRV; 11449-003-PLC, REC, FWL, VEG, SOI, CUL, WTR, TRV; 11449-004-TRV, REC; 11449-005-TRV, PLC, REC; 11449-006-REC, TRV, PLC; 11449-007-TRV, FWL, PLC, SOI, REC; 11449-008-REC, TRV; 11449-009-FWL, PLC
Hein	Thomas		11657	11657-001-PRC, REC, TRV; 11657-002-PRC
Heiney	Brian		1026	1026-001-OIL, RNW, PLC, SOC; 1026-002-OIL, RNW, ALT
Heinrich	Zach		11348	11348-001-PRC, PLC, TRV, REC, ALT
Heisser	Michael		11209	11209-001-PRC, TRV, REC; 11209-002-SOC, REC, TRV; 11209-003-PRC, TRV, REC; 11209-004-PRC, REC, TRV
Helmus	Becky		11452	11452-001-REC, FWL, PLC
Henderson	Harley		12036	12036-001-PRC
Hendry	Bradford		11117	11117-001-PRC, TRV, REC

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Henke	Darrin	Encana Natural Gas	13004	13004-001-PRC, OIL, MIN; 13004-002-ALT, OIL, PRC; 13004-003-PRC; 13004-004-PRC, OIL; 13004-005-OIL, MIN, PRC; 13004-006-ALT, OIL, PRC; 13004-007-PRC, CON, AIR, WTR, FWL; 13004-008-PRC, OIL; 13004-009-OIL, MIN; 13004-010-ALT, OIL; 13004-011-ALT, OIL, SOC; 13004-012-ALT, PRC, OIL; 13004-013-AIR, ALT, PRC, OIL; 13004-014-SOI, ALT; 13004-015-WTR; 13004-016-FWL, ALT; 13004-017-SSS, FWL, OIL; 13004-018-CUL, ALT; 13004-019-VIS, ALT, OIL, PRC; 13004-020-RLT, ALT, OIL; 13004-021-MIN, OIL, ALT, PRC, CUM; 13004-022-ACC, ALT, SSS, OIL; 13004-023-AIR, PRC; 13004-024-WTR, OIL, MIN; 13004-025-FWL, SSS; 13004-026-SSS; 13004-027-CUL, OIL; 13004-028-VIS; 13004-029-LWC; 13004-030-MIN, OIL, SOC; 13004-031-PHS, OIL; 13004-032-AIR, PRC, OIL, ALT; 13004-032-SOC, OIL, MIN; 13004-033-FWL, OIL, MIN, PRC, ALT, SOC; 13004-034-SSS; 13004-035-MIN, OIL, ALT, FWL, TRN; 13004-036-ACC, ALT; 13004-037-SOC, OIL, ALT; 13004-038-FWL, SSS; 13004-039-OIL, MIN, PRC; 13004-040-OIL, MIN; 13004-041-PRC
Hensley	David		11242	11242-001-SOC, OIL, MIN, PRC
Hernandez	D.J.		1962	1962-001-REC, ALT, PLC, TRN
Hernandez	David		11916	11916-001-OIL, SOC; 11916-002-OIL, AIR; 11916-003-OIL, SOC; 11916-004-OIL, SOC; 11916-005-OIL, SOC; 11916-006-OIL
Hernandez	Juan		12073	12073-001-SOC, OIL, MIN; 12073-002-ALT, AIR, OIL, MIN, PHS, PRC
Herrera	James		15004	15004-001-PRC, REC, OIL, SOC; 15004-002-OIL, AIR, PRC; 15004-003-OIL, PRC, SOC, ALT
Herrick	Mike		12020	12020-001-PRC
Hertrich	Angela		11003	11003-001-PRC; 11003-002-TRV, PRC, PLC; 11003-003-PRC, ALT, SOC, REC; 11003-004-TRV, PLC, PRC; 11003-005-PRC, SOC, ALT; 11003-006-PLC, TRV; 11003-007-TRC, ALT; 11003-008-PLC, REC, TRV, PRC
Herwick	Kim		1424	1424-001-OIL, SOC, ALT
Hester	Tom		11119	11119-001-PRC, ALT, TRV, REC

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Hester	Jeff		11651	11651-001-OIL, MIN; 11651-002-LWC, WSA, OIL, REC; 11651-003-OIL, PRC, ALT; 11651-004-ACC, LWC, OIL, ALT, SSS, FWL, PLC; 11651-005-REC, TRV; 11651-006-ALT, REC, FWL, PLC; 11651-007-WSR; 11651-008-ALT, AIR, OIL, MIN, PHS
Hewitt	illegible		1247	1247-001-RLT, ALT, SOC; 1247-002-OIL, SOC; 1247-003-ALT; 1247-004-SOC, SCO
Hewitt	Richard		1248	1248-001-AIR, RLT, ALT
Hick	Zachary		12037	12037-001-AIR, CON, PRC; 12037-002-OIL, MIN
Higgs	Victor		1139	1139-001-OIL, SOC; 1139-002-REC, SCO
Hill	Seth		1125	1125-001-REC; 1125-002-SOC, OIL; 1125-003-SOC, OIL
Hillbrand	David		11384	11384-001-PLC, ALT, REC, TRV; 11384-002-PRC, ALT, TRV, REC
Hilsen	Len		11001	11001-001-TRV, REC, ALT
Hitchcock	Karen		13106	13106-001-REC, PLC, TRN; 13106-002-REC, SOC, TRN
Hite	Henry		13329	13329-001-FLW, PLC, REC, OIL
Hobbs	A.J.		11524	11527-001-ALT, FWL, AIR, WTR, PHS, REC; 11527-002-REC, FWL, SOC, WTR, AIR; 11527-003-OIL, FWL, AIR, WTR, REC, GRZ, SOC, ALT, PLC
Hoeltzner	Tyler		11958	11958-001-OIL, AIR, WTR, SOC; 11958-002-ALT, OIL, SOC
Hoesen	Dick		1706	1706-001-REC, ALT, PLC, TRN
Hoffman	John	Carbondale Trustee	2	002-001-ALT, REC, ACC; 002-002-TRN; 002-003-FWL, OIL; 002-004-WSA, TRV, TRN, SSS, OIL, MIN, WTR, PRC, PLC, RLT, REC; 002-005-LWC, PLC; 002-006-OIL, PLC, PRC; 002-007-WSA, PLC
Hoffman	CJ		1206	1206-001-OIL; 1206-002-ALT, SOC, RNW, OIL; 1206-003-RNW, CUM; 1206-004-RNW, PHS; 1206-005-ALT
Hoke	Cody		12090	12090-001-SOC, OIL, MIN
Holder	Carl		13503	13503-001-PLC, REC, PHS, PRC, SCO
Holliday	Mark		1964	1964-001-REC, ALT, PLC, TRN
Holmes	Brian		11107	11107-001-REC
Holmes	Buddy		12067	12067-001-PRC, OIL, MIN; 12067-002-OIL, MIN, SOC; 12067-003-ALT, OIL, MIN, SOC
Holtz	Katrina		1113	1113-001-SOC
Honeycutt	Shaun		12011	12011-001-PLC; 12011-002-OIL, MIN, SOC, AIR

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Hood	Natalie		11414	11414-001-PLC, TRV, REC, SOC; 11414-002-PLC, TRV, REC, SOC, FWL
Houck	Karen		11427	11427-001-ACC, ALT, PLC, SOC, CAV, MIN; 11427-002-PLC, PAL; 11427-003-CAV, MIN, PAL, PLC, ACC, SOC, TRV, CON
Hren	Nick A.		1023	1023-001-OIL; 1023-002-OIL, SOC, ALT; 1023-003-OIL, SOC, ALT
Hren	Nick		11485	11485-001-OIL, MIN; 11485-002-SOC, OIL, MIN, ALT; 11485-003-PRC, ALT, OIL, MIN
Huckins	Louie		1006	1006-001-OIL, PHS, PRC
Huckins	Louie		11468	11468-001-OIL, MIN
Hudgens	Mark		12039	12039-001-PRC; 12039-002-SSS, ALT, MIN; 12039-003-PRC
Hudson	Jon	President, Montana Pilots' Association	1711	1711-001-REC, PRC, SOC; 1711-002-REC, PLC, PHS, PRC, SOC; 1711-003-REC, PLC, PRC, SOC, ALT; 1711-004-REC, PLC
Huffman	Rodger		1007	1007-001-OIL, PHS, PRC
Huffman	Rodger		11469	11469-001-PHS, OIL, MIN
Hughes	John		11646	11646-001-RLT, PRC; 11646-002-ALT, RLT
Hundy	Britt		11960	11960-001-ALT, OIL, SOC; 11960-002-ALT, SOC, OIL
Hunt	William		1924	1924-001-PLC, ALT, REC, SOI, WTR, FWL
Hunt	Bill		11420	11420-001-PLC, GRZ, ALT, FWL, TRV, SOI
Hunter	William		1114	1114-001-ALT; 1114-002-ALT, SOC
Hunter	Christine		1249	1249-001-RNW, OIL, SOC, PRC
Ingerson?	Ronald		1043	1043-001-ALT, OIL, PLC, SOC
Ingle	Mike		11002	11002-001-PRC, SOC; 11002-002-TRV; 11002-003-ALT, PRC, REC
Ingoldsby	Brian		11	011-001-TRV, REC, PLC; 011-002-TRV, REC, PLC; 011-003-TRV, REC, PLC, WTR; 011-004-TRV, REC, PLC; 011-005-TRV, REC, PLC, SOC
Jacobson	W. R.	Deep Creek Ranch	33	033-001-PLC, REC, TRV, TRN
Jaeger	Nolan		14050	14050-001-OIL, SOC
James	Don		11211	11211-001-TRV, REC, PRC; 11211-002-PLC, TRV, REC, WSA, PRC; 11211-003-PLC, TRV, REC; 11211-004-PRC, TRV, REC
Jarecki	Chuck	Recreation Aviation Foundation	13000	13000-001-REC, TRN; 13000-002-REC, TRN, CON, PRC; 13000-003-REC, TRN, PLC; 13000-004-REC, TRN; 13000-005-REC, ALT, TRN; 13000-006-REC, TRN; 13000-007-REC, TRN, PLC; 13000-008-REC, TRN, PLC

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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

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Jarecki	Chuck	Montana Pilots' Association	13102	13102-001-REC, TRN; 13102-002-REC, TRN, SCO
Jargen	Dahl		16007	16007-001-OIL, SOC
Jerome	Mark		15002	15002-001-ALT, LWC, SOC, PRC
Jobs	Justine		1059	1059-001-OIL, SOC
Johnson	Zachary		1135	1135-001-AIR; 1135-002-AIR; 1136-002-ALT, PHS; 1136-003-ALT, AIR; 1136-004-ALT, SOC; 1136-005-ALT, AIR; 1136-006-ALT, PHS
Johnson	John		12012	12012-001-PRC, OIL, MIN, RNW; 12012-002-ALT, SSS, ACC
Johnston	James		1134	1134-001-ALT; 1134-002-SOC, ALT; 1134-003-SCO
Johnston	Mark		1809	1809-001-PLC, TRN, REC
Johnston	Danielle		13205	13205-001- ALT, PLC, WTR, FWL, REC; 13205-006- PHS, REC
Jones	Robert		1946	1946-001-REC, TRN, SOC; 1946-002-REC, TRN
Jones	Kevin		12075	12075-001-PRC; 12075-002-SOC, SCO
Jones	Scott	Colorado Off Highway Vehicle Coalition and Trail Preservation Alliance	13010	13010-001-SOC, CON, RLT, REC; 13010-002-SOC, CON, TRV; 13010-003-TRV; 13010-004-SOC, PRC, TRV, ALT; 13010-005-TRV, ALT; 13010-006-SOC, REC, PRC; 13010-007-PRC, TRV; 13010-008-REC, TRV; 13010-009-TRV, SOC; 13010-010-REC, TRV; 13010-011-TRV, SOC; 13010-012-TRV; 13010-013-TRV; 13010-014-TRV, REC; 13010-015-TRV, REC, PRC; 13010-016-TRV; 13010-017-TRV, REC, PRC, CON; 13010-018-REC, SOC; 13010-019-SOC; 13010-020-SOC, REC; 13010-021-REC, SOC; 13010-022-REC, SOC, TRV; 13010-023-REC, SOC, TRV; 13010-024-TRV, REC, ALT; 13010-025-ALT, REC, TRV, SOC, SOC; 13010-026-REC, SOC; 13010-027-REC; 13010-028-SOC, SOC; 13010-029-SOC, FWL, CON; 13010-030-FWL, SOC; 13010-031-REC, SOC; 13010-032-REC, TRV, CON, SOC; 13010-033-FWL, VEG, CON, SOC; 13010-034-CON, TRV; 13010-035-CON, SOC, PRC; 13010-036-SOC, REC, RLT; 13010-037-REC; 13010-038-REC; 13010-039-REC; 13010-040-REC; 13010-041-REC, FWL; 13010-043-CON; 13010-044-TRV, CON, SOC; 13010-045-TRV, REC; 13010-046-TRV; 13010-047-TRV, PRC;



**Table V-3**  
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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
continued			13010	13010-048-TRV, REC, CON; 13010-049-REC, TRV, PRC, CON; 13010-050-TRV, REC; 13010-051-PRC, TRV; 13010-052-TRV, REC, PRC, CON; 13010-053-TRV, REC; 13010-054-TRV; 13010-055-REC, TRV, FWL; 13010-056-FWL, SSS; 13010-057-FWL, GRZ, SSS, ACC; 13010-058-FWL, REC, TRV; 13010-059-TRV, FWL; 13010-060-TRV; 13010-061-FWL, CON, TRV; 13010-062-TRV, FWL, REC; 13010-063-REC, FWL, TRV, CON, PRC; 13010-064-REC, TRV, FWL; 13010-065-FWL, REC, TRV, SOC, CON; 13010-066-FWL, REC, TRV, ALT; 13010-067-REC, TRV, ALT, CON; 13010-068-REC, FWL, SSS; 13010-069-FWL, SSS; 13010-070-REC, FWL, SSS; 13010-071-REC, FWL, SSS, CON; 13010-072-REC, FWL, SSS; 13010-073-REC, FWL, CAV, TRV, PRC; 13010-074-REC, PLC, PRC, TRV; 13010-075-PLC, FWL, SSS, REC; 13010-076-FWL, SSS, REC, PLC; 13010-077-ALT, WSA, ACC, SOC; 13010-078-WSA, CON, REC, TRV; 13010-079-FWL, WSA, ACC, CON; 13010-080-WSA,TRV; 13010-081-TRV, REC, PLC, WSA; 13010-082-ALT, WSA, ACC, PLC; 13010-083-PLC, WSA; 13010-084-PLC, WSA; 13010-085-WSA, CON, PRC; 13010-086-WSA, PLC, PRC, CON; 13010-087-ACC; 13010-088-ACC, WSA, PLC, ALT, REC; 13010-089-ACC, FWL, CON, SOC, REC, SSS; 13010-090-ACC, PLC, CUL; 13010-091-ACC, REC, SOC, CUL; 13010-092-CUL, PAL; 13010-093-ACC, PLC, SSS; 13010-094-ACC, REC, PLC; 13010-095-ALT, SSS, FWL, PRC, REC; 13010-096-REC, CON; 13010-097-FWL, SSS, REC; 13010-098-CON; 13010-099-ALT; 13010-100-TRV, CON; 13101-042-REC, FWL, TRV
Jones	Robert	Glade Park Associates, Inc.	13105	13105-001-REC, TRN; 13105-002-REC, TRN, PLC, PHS, SCO
Jones	Brian		17251	17251-001-ALT, REC, TRN
Judge	William		1626	1626-001-REC, TRN, ALT; 1626-002-PLC, PHS, REC, TRN, ALT; 1626-003-REC, TRN; 1626-004-CON

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Kakoyannis	Christina		13206	13206-001- PLC,REC; 13206-002- REC, PHS; 13206-003- REC, PLC, PHS; 13206-004- REC, PLC, PHS; 13206-005- REC, PHS; 13206-006- PLC, REC; 13206-008- PHS, PLC, REC, ALT; 13206-009- PHS, RECPLC, ALT, TRV; 13206-010- PHS, SOI; 13206-011- REC, PLC, PHS, ALT; 13206-012- REC, PLC, PHS, SOI, ALT; 13206-013- ALT, LWC, REC, WTR, AIR, FWL, VEG, ALT; 13206-014- ACC, ALT
kalin	Gary		1209	1209-001-AIR; 1209-002-PRC, OIL; 1209-003-PRC
Kancilva	Kirk		1426	1426-001-PRC, TRV, REC; 1426-002- REC, SOC; 1426-003-PRC, OIL, AIR
Karolides	Alexis		11413	11413-001-ALT, REC, FWL, PLC
Kawaguchi	Jerry		11258	11258-001-OIL, MIN, SOC
Kay	Robert		1911	1911-001-PRC; 1911-002-REC, TRN, PLC; 1911-003-REC, TRN; 1911-004- REC, TRN
Keeling	Michael		24	024-001-PLC, PRC; 024-002-PLC, REC, TRV
Keeney	Joseph		12025	12025-001-REC; 12025-002-OIL, MIN; 12025-003-ALT
Keilman	Karl		1106	1106-001-RNW; 1106-002-RNW
Keller	Douglas		11321	11321-001-PRC, REC; 11321-002- PRC, OIL, REC, PLC
Kellum	Richard		13125	13125-001-REC, TRN, PLC, SCO
Kelly	Debbie		11018	11018-001-ALT, PLC, REC, SOC
Kelly	Jerry		13140	13140-001-REC, TRN
Kembel	Bob and Joanne		1942	1942-001-REC, TRN, PLC
Kennedy	Byron A.		1002	1002-001-OIL, SOC
Kennedy	Byron		11464	11464-001-SOC, OIL, MIN
Kenney	Kelby		1009	1009-001-WSA, SOC, PRC, OIL, LWC
Kenney	Kelby		11471	11471-001-SOC, OIL, MIN; 11471- 002-LWC, PRC
Kerler	Hollis		11620	11620-001-FLW, OIL, MIN, ALT; 11620-002-LWC, WSA, OIL, MIN, REC; 11620-003-OIL, MIN, PRC, ALT; 11620-004-ACC, LWC, OIL, MIN, ALT, SSS, SOI, PLC; 11620- 005-REC, TRV; 11620-006-ALT, REC, TRV; 11620-007-WSR; 11620- 008-AIR, OIL, MIN, PHS, PRC, WTR; 11620-009-PRC
Ketcham	William		17008	17008-001-REC, TRN, PLC, SOC; 17008-002-REC, TRN, PHS
Ketzenberg	Lee		15000	15000-001-ALT, OIL, MIN, PRC, AIR

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Kilstrom	Kevin	Antero Resources Piceance Corporation	17033	17033-001-ALT, SOC, OIL; 17033-002-ALT, OIL; 17033-005-OIL; 17033-006-OIL; 17033-007-SOC, OIL; 17033-003-ALT, OIL
Kimball	Spencer	Western Energy Alliance	11610	11610-001-MIN, OIL, PLC, SOC; 11610-002-ALT, OIL, MIN, SOC; 11610-003-ALT, PRC, SOC, PLC; 11610-004-ALT, MIN, OIL, PRC; 11610-005-ALT, OIL, MIN, RLT, VIS; 11610-006-OIL, MIN, ALT, PRC, SOC; 11610-007-ALT, PRC, OIL, MIN; 11610-008-AIR, MIN, OIL, PRC; 11610-009-SOC; 11610-010-OIL, MIN; 11610-011-CUM, OIL, MIN, SOC; 11610-012-OIL, ALT, PRC; 11610-013-OIL, MIN, PRC; 11610-014-VIS, ALT, OIL; 11610-015-FWL, OIL; 11610-016-PRC, ALT; 11610-017-PRC, CUM, SOC, AIR; 11610-018-PRC, OIL, MIN; 11610-019-AIR, CUM, OIL, MIN; 11610-020-ALT, PRC
Kimball	Spencer	Western Engery Alliance	17034	17034-001-OIL, PLC, SOC; 17034-002-OIL, SOC, SOC; 17034-003-ALT, SOC, PLC; 17034-004-ALT, OIL; 17034-005-ALT; 17034-006-AIR; 17034-007-SOC, OIL; 17034-008-OIL; 17034-009-CUM; 17034-010-OIL; 17034-011-OIL; 17034-012-VIS; 17034-013-FWL; 17034-014-PRC; 17034-015-SOC; 17034-016-AIR, CUM, OIL; 17034-017-ALT
Kimmel	Jeremy		11343	11343-001-PLC, TRV, REC, SOC
King	Travis		11364	11364-001-PLC, TRV, REC
Kinoshita	Perry		11204	11204-001-PRC; 11204-002-PRC, REC, TRV; 11204-003-PRC, REC, TRV
Kinser	Michael		11318	11318-001-ALT, PRC, ACC, VEG, SSS; 11318-002-GRZ, REC, TRV, RLT, MIN, VEG, SSS; 11318-003-FWL, VEG, SSS, ACC; 11318-004-PRC, ACC, VEG, SSS; 11318-005-SOC, VEG, ACC, SSS; 11318-006-ACC, SSS, VEG, PRC, ALT
Kirk	Junnee		11536	11536-001-REC, FWL, PLC
Kirk	Junnee		11630	11630-001-PLC, TRV, REC, ALT, FWL; 11630-002-FWL, TRN, TRV, REC, PLC, ALT

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Kitzmann	Kathy	City of Aurora Water Department	11609	11609-001-PRC, CON; 11609-002-WTR, WSR; 11609-003-ALT, WSR, WTR; 11609-004-WSR, WTR, PRC, CON; 11609-005-WTR, PRC, REC, MIN, OIL; 11609-006-WTR, PRC; 11609-007-WTR, CON, PRC; 11609-008-WTR, PRC, ALT, REC; 11609-009-WTR, PRC; 11609-010-RLT, WTR, ALT, PRC; 11609-011-CON, PRC, WTR; 11609-012-ALT, REC, WTR, PRC; 11609-013-ALT; 11609-014-CLC, PRC; 11609-015-REC; 11609-016-WTR, REC, PRC; 11609-017-WTR, REC; 11609-018-WTR, REC; 11609-019-ALT, PRC, WTR, SOC, REC; 11609-020-WTR, REC, PRC; 11609-021-WTR, PRC; 11609-022-CUM; 11609-023-ALT, PRC
Knoke	Berry		1011	1011-001-OIL, PRC; 1011-002-OIL
Knoke	Berry		11473	11473-001-OIL, MIN, PRC; 11473-002-PLC, OIL, MIN
Knowles	Patrick		1949	1949-001-REC, TRN, PLC
Koehler	Tom		13104	13104-001-REC, TRN; 13104-002-REC, TRN, PLC, SOC; 13104-003-REC, TRN, PHS; 13104-004-REC, TRN, SOC
Koemick	Lindi		11950	11950-001-OIL, SOC
Koenck	David		11392	11392-001-PLC, TRN, TRV, FWL
Kolar	Julie		11335	11335-001-PLC, PRC
Kolar	Julie		11395	11395-001-PLC, TRV, TRN, FWL, PRC
Kolar	Julie		11449	11449-001-PLC, TRV, REC, FWL; 11449-002-CON, TRV, REC
Kolar	Julie		11602	11602-001-PLC, TRV, REC; 11602-002-CON, PLC, FWL, TRV
Koop	Karin		11352	11352-001-PLC, TRV, REC
Koskovich	Allen		12014	12014-001-OIL, MIN, PLC, ALT, PHS, SOC
Krall	David		11444	11444-001-REC, TRN, PLC, SOC; 11444-002-REC, TRN, FWL, PRC; 11444-003-TRN, PHS, SOC, PRC
Krall	David		11902	11902-001-REC, TRN; 11902-002-REC, PLC, SOC, TRN; 11902-003-REC, TRN
Kram	Megan	The Nature Conservancy of the Colorado River Valley	11627	11627-001-PRC; 11627-002-PRC, OIL, MIN, ALT, SSS, ACC; 11627-003-ALT, PLC, ACC, CAV, SSS; 11627-004-ACC, VEG, MIN, OIL, REC, WSR; 11627-005-SSS, MIN, OIL

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Krayer	Barry		11216	11216-001-SOC, TRV, REC; 11216-002-PLC, REC, TRV; 11216-003-PRC; 11216-004-PRC, PLC, WSA; 11216-005-PRC, TRV, REC; 11216-006-REC, TRV, PRC
Kroehler	Corbett		13307	13307-001-OIL, MIN, FWL, SSS ; 13307-002-WTR, WSR, LWC; 13307-003-OIL, MIN, PRC
Kurth	Nathan		1920	1920-001-REC, TRN; 1920-002-REC, TRN, PLC; 1920-003-REC, SOC
Kurth	Nathan		11528	11528-001-REC, TRN; 11528-002-REC, TRN, PLC
Kyle	Thomas		11654	11654-001-OIL, MIN, FWL, TRV, WSR, PRC
L-	Tony		1034	1034-001-AIR; 1034-002-AIR, CON, PRC; 1034-003-OIL, RNW; 1034-004-OIL, RNW, SOC
L...?	David		12055	12055-001-SOC, OIL, MIN
Ladd	Frank	Rifle Area Chamber of Commerce	11618	11618-001-SOC, PRC, CON
Land	Lloyd		1929	1929-001-REC, ALT, PLC, TRN
Landeros	Luis		1070	1070-001-OIL, SOC, REC, PRC
Landry	Mandy		1414	1414-001-OIL, AIR, PHS
Lane?	David		1054	1054-001-OIL, PLC, SOC; 1054-2-OIL, SOC, AIR
Langdon	Mike		11207	11207-001-PRC; 11207-002-TRV, REC; 11207-003-REC, TRV, PRC; 11207-004-VEG, FOR; 11207-005-ALT, PRC
Lange	Marc	Class 8 Trucks	13504	13504-001-REC; 13504-002-PHS; 13504-003-SOC; 13504-004-REC, SCO
Lansing	Joe		14025	14025-001-OIL, SOC
Larson	David		1616	1616-001-REC, TRN, ALT, PLC; 1616-002-REC, TRN, PHS; 1616-003-REC, TRN, SCO
Larson	David R.		13129	13129-001-REC, TRN, PLC, SOC; 13129-002-REC, TRN, PHS
LaViolette	Corrine		11461	11461-001-PHS, WTR, SOC, REC, FWL, ALT; 11461-WTR, ALT, WSR
Lawrence	Jennifer		1221	1221-001-AIR, SOC, RNW; 1221-002-CON, ALT, SCO
Leavitt	Erika		11404	11404-001-PLC, REC; 11404-002-FWL, TRV, REC; 11404-003-REC, TRV, SOC; 11404-004-PLC, TRV, REC
Lederhause	Mike		11521	11521-001-REC, ALT, CON, PRC, SOC, TRN, PLC; 11521-002- ALT, ACC, REC, PLC, PRC, SOC, TRN; 11521-003- ALT, REC, PLC, PRC, SOC, TRN
Lederhause	Mike		11976	11976-001-REC, TRN, PLC; 11976-002-ACC, PLC, REC, ALT, TRN; 11976-003-REC, TRN

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Ledinsky	John		15003	15003-001-PRC, OIL
Lee	Mitch		11526	11526-001- PLC, REC, FWL, ALT, PRC
Lee	Chad		17003	17003-001-ALT, PLC, MIN, OIL; 17003-002-PLC, OIL, WTR; 17003-003-PLC, ACC, ALT
Lemoine	Bruce		11108	11108-001-PRC; 11108-002-TRV, PRC; 11108-003-TRV; 11108-004-ALT; 11108-005-ALT, PRC; 11108-006-TRV, VEG, FWL; 11108-007-PLC, REC, WSA; 11108-008-REC, TRV; 11108-009-PLC, TRN, TRV, REC; 11108-010-LWC, ACC; 11108-011-PRC, FWL
Lentz	Zach		11017	11017-001-ALT; 11017-002-REC
Levine	Rinah		13108	13108-001-REC, TRN; 13108-002-REC, TRN, PLC, SOC; 13108-003-REC, TRN, PHS; 13108-004-REC, TRN, SOC
Lewis	Nate		12085	12085-001-OIL, MIN, SOC
Li...?	Timothy		11952	11952-001-OIL, SOC
Liberty	Janet		13135	13135-001-REC, TRN; 13135-002-REC, TRN, PHS
Liebetrau	Lloyd		11219	11219-001-PRC, TRV, REC; 11219-002-SOC, SOC, TRV, REC; 11219-003-TRV, REC, PRC; 11219-004-TRV, REC
Liebetrau	Marilyn		11221	11221-001-REC, TRV
Lien	David	Backcountry Hunters and Anglers	11011	11011-001-PRC, SOC, ALT; 11011-002-REC, PHS, SOC; 11011-003-REC, FWL; 11011-004-FWL, WSA, REC, ALT, SOC, PLC; 11011-005-ALT, REC; 11011-006-WSA, ALT, REC; 11011-007-REC, PLC, ALT; 11011-008-OIL, ALT, SOC, PRC, CON, ACC, WSA; 11011-009-REC; 11011-010-REC, FWL, PRC; 11011-011-TRV, FWL, REC, SOC; 11011-012- REC, SOI, WTR, FWL, PRC; 11011-013-ALT, CON, PRC; 11011-014-REC, WSA, TRV, PRC; 11011-015-FWL, REC, PRC, SOC, TRV; 11011-016-REC, SOC, PRC; 11011-017-WSA, PRC, ALT, SCO
Lien	David		11261	11261-001-CON, PRC, REC, TRV
Lilja	Daniel		1625	1625-001-REC, TRN, PLC, ALT
Lindauer	Ivo		1921	1921-001-PLC, ALT; 1921-002-FWL, REC, GRZ; 1921-003-WTR, GRZ, VEG; 1921-004-ALT, MIN, OIL, RNW
Lindseth	Brad		11111	11111-001-REC, TRV; 11111-002-ALT; 11111-003-ALT, PRC; 11111-004-PRC

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Lindseth	Brad		11520	11520-001- REC, ALT, TRV; 11520-002- REC, ALT, TRV, SOC; 11520-003- ALT, PRC, SCO
Lipscomb	Clark		11532	11532-001-ALT, TRV, RLT, PLC
Lipscomb	Clark		11532	11532-001-ALT, TRV, RLT, PLC; 11532-002-TRV, REC, PLC; 11532-003-PLC, TRV, RLT
Lipscomb	Clark		11532	11532-003-PLC, TRV, RLT; 11532-004-RLT, SOC, PLC; 11532-005-RLT, PLC, TRV, SOC
Lipscomb	Clark	Woody Creek Ventures, LLC	12050	12050-001-ALT, TRN, RLT, PLC; 12050-002-RLT, TRN, PLC
Lipscomb	Clark	Woody Creek Ventures, LLC	17114	17114-001-GRZ, PLC
Littlejohn	Candace		11000	11000-001-TRV, REC, SOC, ALT
Lively	Lex		1433	1433-001-ALT, PRC, OIL, MIN, SOC
Logan	Bonnie		1066	1066-001-PRC, ALT, SOC; 1066-002-OIL, ALT; 1066-003-SOC, ALT
Lombardi	Peter		11349	11349-001-TRV, ALT, REC, ACC, FWL, VEG; 11349-002-PLC, TRV, REC, ACC, VEG; 11349-003-SOC, TRV, REC
Long	Mark		1906	1906-001-TRN, REC; 1906-002-REC, TRN, PLC
Long	Jennifer		11430	11430-001-REC, PLC, TRV; 11430-002-REC, PLC, TRV, FWL; 11430-003-REC, PLC, FWL; 11430-004-OIL, ALT, REC, WTR, PHS, VIS, FWL
Long	Becky	Colorado Environmental Coalition	11652	11652-001-WSR, ALT; 11652-002-CON, PRC; 11652-003-WSR, WTR, ALT, PRC, CON; 11652-004-WTR, CON
Long	Mike		11901	11901-001-REC, PLC, ALT; 11901-002-REC, PLC; 11901-003-REC
Lopez	Jose		11913	11913-001-SOC, OIL; 11913-002-SOC, OIL; 11913-003-OIL, SOC, SCO
Luark	Mike	Luark's Quarter Circle L Ranch	12049	12049-001-ACC, CON, ALT, PLC, SSS, GRZ
Ludke	Peter		11530	11530-001-REC, PLC, TRN
Luedke	Gina		11346	11346-001-ALT
Luedtke	Rick		11238	11238-001-PRC, REC, TRV
Lutes	Rick and Amy		13134	13134-001-REC, TRN, PLC, SOC; 13134-002-REC, SOC
Lutts	Chris		12009	12009-001-ALT, OIL, MIN, PRC
Lyons	Hal	Camp Chateaugay	1621	1621-001-REC, TRN, PLC, ALT; 1621-002-REC, TRN, ALT; 1621-003-REC, TRN, PHS; 1621-004-SCO
Lyons	Natalie		11460	11460-001-OIL, PHS
M	Jenie		1314	1314-001-MIN, OIL, SOC; 1314-002-MIN, OIL, PHS
M-	John		1039	1039-001-SOC, REC, OIL

**Table V-3**  
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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
M-	John		1050	1050-001-OIL, SOC; 1050-002-OIL, SOC, REC; 1050-003-OIL, REC, SOC
M-	T-		1051	1051-001-ALT, FWL, SSS, ACC
M-	Robert		1085	1085-001-AIR; 1085-002-OIL, PRC; 1086-001-OIL, PHS; 1086-002-OIL, REC, FWL
MacPherson	Jeanne	Mountain Airdance LLC	1806	1806-001-REC, TRN, PLC, SOC; 1806-002-REC
MacPherson	Stuart		1923	1923-001-REC, TRN; 1923-002-REC, TRN, PLC
Madden	??		1959	1959-001-REC, ALT, PLC, TRN
Maganol	Lino		11970	11970-001-OIL, WTR, FWL, ALT, VEG, SOC
Maher	Tom		15	015-001-REC, PLC; 015-002-PLC, REC, TRV
Maiden	Wayne		11115	11115-001-PRC, REC, TRV
Malloy	Charles		17248	17248-001-ALT, PLC, REC, TRV
Mannel?	Tim		1030	1030-001-OIL, RNW, SOC; 1030-002-OIL, PLC, SOC
Mareth	Lynn		1712	1712-001-REC, PLC; 1712-002-REC, PLC; 1712-003-REC, PLC; 1712-004-REC, PLC, PHC, SOC
Marshman	Glen		1935	1935-001-REC, ALT, PLC, TRN
Martinez	Terry		1033	1033-001-OIL; 1033-002-OIL, PRC, SCO
Martinez	Randy		1220	1220-001-RNW; 1220-002-FWL, ALT, PRC; 1220-003- SOC
Martinez	James		1226	1226-001-ALT; 1226-002-OIL, RNW, SOC; 1226-003-ALT, OIL, SOC, CUM; 1226-004-SOC, ALT; 1226-005-PHS, ALT, OIL
Martinez	Angela		12030	12030-001-ALT, OIL, MIN, SOC
Masciarotte	Mark		11024	11024-001-REC, PLC, ALT, PRC, SOC; 11024-002-REC, ALT, CON
Massey	William		1620	1620-001-REC, TRN, ALT; 1620-002-PHS, REC, TRN; 1620-003-PLC, TRN, REC; 1620-004-CON
Mattix	Aaron		11013	11013-001-REC, PLC, FWL, TRV; 11013-002-PLC, REC, SOC; 11013-003-REC, FWL, CUL, SOC, ALT, PRC; 11013-004-PLC, REC, CUL, TRV; 11013-005-VEG, FWL; 11013-006-VEG, REC, TRV, PLC, ALT
Mattson	Carl		13120	13120-001-REC, TRN, PLC
Matz	Andrew		15006	15006-001-OIL, ALT, SOC
May	Nowell	Black Mountain Ranch	11451	11451-001-PLC, TRV, PHS; 11451-002-TRV, REC, VEG, PHS; 11451-003-VEG; 11451-004-REC, PLC, WTR, WSR
Mayne	Joel		11372	11372-001-REC, TRV, PLC
Mayo	Joanne		1704	1704-001-RLT, AIR, WTR, SOI; 1704-002-PLC, TRV



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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
McBroom	Bud		13123	13123-001-REC, TRN, PLC, SOC, PHS
McCall	Brian		11501	11501-001-REC; 11501-002-PLC, REC, TRV; 11501-003-PLC, REC, TRV, ALT
McClellan	Roz	Rocky Mountain Recreation Initiative	13221	13221-001-SSS, VEG, FWL, REC; 13221-002-PRC, RLT, FWL; 13221-003-REC, TRV; 13221-004-REC, PLC, ALT; 13221-005-REC, FWL, TRV; 13221-007- REC, ALT, TRV; 13221-008-PLC, REC, ALT, FWL; 13221-009-PLC, REC, ALT, FWL, SOI; 13221-010-PLC, ALT, REC, FWL; 13221-011-PLC, ALT, REC; 13221-012-LWC, PLC, ALT, REC; 13221-013-LWC, PLC, ALT, OIL, TRV; 13221-014-LWC, PLC, ALT, FWL, VEG; 13221-015-TRV, REC, ALT, PRC; 13221-016-TRV, ALT, PRC, SOC, REC; 13221-017- TRV, ALT, PRC, SOC; 13221-018- TRV, ALT, PRC, SOC; 13221-019-REC, ALT, PRC, SOC; 13221-020-REC, CON, ALT, PRC, SOC; 13221-021-TRV, REC, CON, ALT, PRC, SCO
McCloud	Brad		11103	11103-001-OIL, MIN; 11103-002-PRC; 11103-003-SOC, MIN, OIL, PLC, PRC; 11103-004-PRC, SOC
McCloud	Brad		11525	11525-001- OIL, PLC, CON, ALT, PRC, SOC, SOC
McComb	Trent		11903	11903-001-OIL, SOC; 11903-002-ALT, SOC; 11903-003-OIL, RNW; 11903-004-SOC, OIL; 11903-005-SOC
McCormack	Tim		11500	11500-001-REC, PRC, ALT
McCormack	Tim		11965	11965-001-REC, TRN
McCormick	Justin		1408	1408-001-REC, OIL; 1408-002-SOC; 1408-003-OIL, PHS
McCormick	Adam		14007	14007-001-OIL, SOC
McCune	Chad		1310	1310-001-PRC, OIL
McDaniel	Brett		1072	1072-001-SOC; 1072-002-SOC; 1072-003-PRC, CON
McDaniel	Gary		1611	1611-001-REC, TRN, ALT; 1611-002-REC, TRN, PHS; 1611-003-CON
McDonald	David		19	019-001-REC, TRV, SOC, PLC; 019-002-PLC, REC, TRV; 019-003-PLC, TRV, REC, SOC; 019-004-PLC, REC, TRV
McDonald	David		20	020-001-PLC, REC, TRV, SOC
McEwen	Bill		35	035-001-REC, TRV, TRN, FWL, LWC
McFarland	Paula		1427	1427-001-SOC, OIL, MIN, ALT

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
McFarland	Chris		1811	1811-001-REC, TRN, PLC; 1811-002-REC, TRN, CON
McKenna	John	Recreational Aviation Foundation	1640	1640-001-ALT, REC, TRN; 1640-002-CON, PRC, TRN; 1640-003-REC, TRN, ALT; 1640-004-PLC, ALT, TRN, REC; 1640-005-REC, TRN, ALT; 1640-006-REC, TRN, ALT; 1640-007-REC, TRN, ALT, SOC; 1640-008-REC, ALT, PLC; 1640-009-PLC, REC, TRN, ALT, CON, PRC; 1640-010-PRC, ALT, REC, TRN; 1640-011-CON
McKenna	Tricia		1817	1817-001-TRN, REC, SOC, PRC
McKenna	John		13131	13131-001-REC, TRN
McKenzie	Stanley		11231	11231-001-TRV, REC, PRC
McKie	Hilary		11408	11408-001-PLC, REC, TRV, FWL
McLendon	Bob		11206	11206-001-ALT, SOC, TRV; 11206-002-TRV, PRC
McMahon	Bill		1617	1617-001-REC, TRN, ALT, PLC
McMullen	Jim		1961	1961-001-REC, ALT, PLC, TRN
McMullen	Mary		11110	11110-001-TRV, PRC; 11110-002-TRV, FWL, CAV; 11110-003-ALT; 11110-004-ALT, PRC; 11110-005-TRV, FWL, VEG; 11110-006-PLC, REC, WSA; 11110-007-TRV, TRN; 11110-008-PLC, TRV, REC; 11110-009-LWC, ACC
McWilliams	Sean		1	001-001-OIL, PLC
Meil	Kris		14015	14015-001-OIL, SOC
Meil	Claire		14018	14018-001-OIL, SOC
Mellon	Nick		11945	11945-001-OIL, PHS; 11945-002-PHS
Mendoza	Benito		11908	11908-001-REC, SOC, OIL, ACC, SOC; 11908-002-SOC, OIL; 11908-003-PLC, REC, OIL, SOC
Mendoza	Bravio		11910	11910-001-ALT, OIL, PLC; 11910-002-SOC, OIL, RLT; 11910-003-OIL, SOC; 11910-004-OIL, SOC
Mendoza	Alem		11963	11963-001-OIL, REC, SOC; 11963-002-SOC, OIL, REC; 11963-003-OIL, SCO
Mendoza	Benito		12002	12002-001-PRC; 12002-002-SOC, ALT; 12002-003-PRC, OIL, MIN, RNW, SOC, REC; 12002-004-PRC

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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
Meulengracht	Robert	Trout Unlimited	13002	13002-001-WTR; 13002-002-PRC; 13002-003-OIL, ALT, FWL; 13002-004-OIL, FWL; 13002-005-ALT, OIL, FWL, REC; 13002-006-OIL; 13002-007-PRC; 13002-008-RNW, WTR, FWL, RLT; 13002-009-WTR, OIL, FWL; 13002-010-AIR, OIL; 13002-011-OIL, PRC, AIR, WTR, PHS, SOC, REC; 13002-012-FWL, PRC; 13002-013-OIL, PRC; 13002-014-ALT, PRC; 13002-015-OIL, AIR, WTR; 13002-016-FWL; 13002-017-FWL, SSS, OIL; 13002-018-PRC; 13002-019-WTR, FWL, SSS, OIL; 13002-020-ALT, WTR, FWL, SSS, OIL; 13002-021-FWL, SSS, WTR, OIL, ACC, PRC; 13002-022-ALT, WTR, FWL, SSS; 13002-023-WTR, FWL, SSS, OIL; 13002-024-WTR, OIL, FWL, SSS; 13002-025-FWL, OIL, ALT, PRC; 13002-026-OIL, FWL, ALT; 13002-027-FWL, OIL, ALT; 13002-028-WTR, ALT, FWL, OIL, PRC; 13002-029-WTR, FWL, OIL; 13002-030-WTR, OIL; 13002-031-WTR, OIL; 13002-032-WTR, OIL; 13002-033-WTR, OIL; 13002-034-FWL, OIL, SSS, WTR; 13002-035-FWL, WTR; 13002-036-SOI, FWL, OIL; 13002-037-ALT, OIL, FWL; 13002-038-REC, FWL, ALT, WTR, SSS, TRV; 13002-039-ACC, ALT, WTR, SSS, PLC; 13002-040-SOC, OIL, AIR, PHS, REC, CUM, VEG; 13002-041-WTR, OIL, FWL, ACC, SSS, ALT; 13002-042-OIL, FWL, SSS, WTR, ALT, PRC
Miesler	Hans		17007	17007-001-REC, TRN, PLC, SCO
Mikesell	Danni		1422	1422-001-OIL, ALT, PHS, SOC
Miller	Dustin		1042	1042-001-FWL, SSS, MIN; 1042-002-OIL, RNW
Miller	William		1638	1638-001-TRN; 1638-002-ALT, TRN, REC; 1638-003-TRN, REC, ALT, SOC; 1638-004-ALT, TRN, REC
Miller	William		11127	11127-001-TRN, REC, PRC, PLC, SOC; 11127-002-PRC; 11127-003-PRC, TRN, REC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Miller	Randall	Colorado Snowmobile Association	13001	13001-001-PRC; 13001-002-TRV, REC, PRC; 13001-003-TRV, REC, PRC, WSA, ACC, ALT; 13001-004-PRC; 13001-005-ALT, REC, TRV, PRC; 13001-006-REC; 13001-007-PRC, REC, TRV, ALT; 13001-008-PRC, REC; 13001-009-REC, FWL, PRC; 13001-010-REC, TRV; 13001-011-PRC; 13001-012-REC, TRV, ALT; 13001-013-ACC, LWC, TRV; 13001-014-TRV, REC, FWL; 13001-015-TRV, ALT; 13001-016-TRV, REC, PRC; 13001-017-REC, TRV, ALT, LWC, ACC, PLC; 13001-018-ALT, REC, TRV, PLC, PRC; 13001-019-REC, TRV, PLC; 13001-020-FWL, TRV; 13001-021-REC, TRV; 13001-022-TRV, REC, SOC; 13001-023-REC, WTR, TRV; 13001-024-FWL, REC; 13001-025-FWL, REC; 13001-025-FWL, REC, PRC, TRV
Miller	Bonnie		17122	17122-001-REC, TRV
Millette	Robert	Roaring Fork Sierra Club Group	11446	11446-001-SOC, ALT, REC, FWL; 11446-002-ALT, OIL; 11446-003-PLC, REC, FWL, SOC; 11446-004-ALT, AIR, OIL; 11446-005-OIL, ACC, LWC, ALT, REC; 11446-006-ALT, OIL, REC, PLC; 11446-007-ALT, FWL, PLC, WTR; 11446-008-WSR, FWL, WTR; 11446-009-PLC, REC, VIS, GRZ, FWL, WTR; 11446-010-PLC, OIL, RLT
Mitchell	Michael		1818	1818-001-TRN, PHS
Mohr	Rick		1939	1939-001-REC, TRN; 1939-002-REC, TRN, SCO
Mondienis	Denver		15001	15001-001-OIL, AIR, PHS
Montero	Ruben		12061	12061-001-OIL, MIN, ALT, SOC; 12061-002-OIL, MIN; 12061-003-PHS, OIL, MIN; 12061-004-ALT, OIL, MIN, SOC
Moon	Ray		16004	16004-001-SOC, OIL; 16004-002-SOC, OIL; 16004-003-OIL, CON; 16004-004-CON, PHS, OIL
Moreland	Lindsey		1932	1932-001-REC, ALT, PLC, TRN
Morey	Rob		1609	1609-001-PLC, REC, ALT; 1609-002-PLC, ALT, REC; 1609-003-PLC; 1609-004-PLC; 1609-005-REC, SOC, TRV
Morey	Rob		11379	11379-001-PRC; 11379-002-PLC, TRV, REC, ALT, RLT; 11379-003-PLC, REC, TRV, ALT; 11379-004-PLC, TRV; 11379-005-REC, TRV, SOC

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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
Morris	Tom		13126	13126-001-REC, TRN
Morrison	Gabe		12032	12032-001-ALT, OIL, MIN, SOC;
Morrow	Derek		11957	11957-001-ALT, OIL, AIR, WTR; 11957-002-OIL, SOC, ALT; 11957-003-ALT, SCO
Mortensen	Lou		1917	1917-001-SOI, PLC, VEG, FWL; 1917-002-RNW, ALT; 1917-003-ALT
Mosely	Claire	Joint Association	11614	11614-001-CON; 11614-002-OIL, MIN, PRC; 11614-003-PRC, AIR, OIL, MIN, VIS; 11614-004-ALT, AIR, FWL, PRC, OIL, MIN; 11614-005-PRC, OIL, MIN; 11614-006-OIL, MIN, ALT, PRC; 11614-007-OIL, MIN, FWL, CUL, CON, SSS, PRC; 11614-008-ALT, OIL, MIN; 11614-009-OIL, MIN, ALT, FWL, AIR; 11614-010-ALT, OIL, MIN; 11614-011-ALT, OIL, MIN, PRC; 11614-012-ALT, OIL, MIN, SOC, PRC, VIS; 11614-013-ALT, OIL, MIN, PRC; 11614-014-OIL, MIN, PRC, FWL, ALT; 11614-015-ALT, OIL, MIN; 11614-016-PRC, OIL, MIN; 11614-017-SOC, ALT, PRC, OIL, MIN; 11614-018-SSS, LWC, WSA, ACC, SOI, WTR, REC, MIN, OIL, SOC; 11614-019-SOC, OIL, MIN, PRC; 11614-020-ALT, OIL, MIN; 11614-021-ALT, SOC, OIL, MIN; 11614-022-PRC, OIL, MIN; 11614-023-OIL, MIN; 11614-024-LWC, WSA, PRC; 11614-025-LWC, PRC; 11614-026-AIR; 11614-027-ALT, AIR; 11614-028-AIR, OIL, MIN; 11614-029-ALT, TRN, AIR; 11614-030-OIL, MIN, AIR; 11614-031-AIR, ALT; 11614-032-OIL, MIN, CUM, AIR, ALT; 11614-033-OIL, MIN, ALT; 11614-034-TRN, OIL, MIN; 11614-035-AIR, ALT, OIL, MIN; 11614-036-ALT, TRN, OIL, MIN, AIR; 11614-037-AIR, ALT; 11614-038-AIR, PLC, VIS; 11614-039-AIR, VIS; 11614-040-AIR, ALT, VIS; 11614-041-AIR, ALT, TRN, VIS, PLC, OIL, MIN; 11614-042-AIR; 11614-043-AIR; 11614-044-OIL, MIN, AIR; 11614-045-AIR; 11614-046-ALT, AIR; 11614-047-WTR, PRC, CON; 11614-048-FWL, PRC, CON; 11614-049-FWL, WTR, ALT, CON, PRC; 11614-050-FWL, CON; 11614-051-SSS, CON; 11614-052-FWL, CON; 11614-053-ALT, FWL, WTR; 11614-054-FWL, ALT;

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Last Name First Name		Organization	Letter ID Code	Comment ID Codes
continued			11614	11614-055-ALT, FWL; 11614-056-ALT, WTR, SSS; 11614-057-SSS, ALT; 11614-058-PRC; 11614-059-PRC, SSS; 11614-060-PRC, FWL, WTR; 11614-061-FWL; 11614-062-LWC, ALT, PRC; 11614-063-FWL; 11614-064-SSS; 11614-065-CUL; 11614-066-VIS, OIL, ALT; 11614-067-RLT, OIL; 11614-068-PRC, ALT; 11614-069-PRC, ALT, OIL, MIN; 11614-070-PRC, ALT, CON
Moss	Brent		9	009-001-PLC, MIN, OIL, ALT; 009-002-CUM
Moss	Miranda		11939	11939-001-OIL, SOC; 11939-002-OIL, AIR, SOC, PHS; 11939-003-OIL, SOC; 11939-004-OIL, SOC; 11939-005-OIL, SOC; 11939-006-OIL
Mourar	Mary		11016	11016-001-WSA, ALT, REC, OIL, FWL, PLC; 11016-002-OIL, ALT, ACC, LWC
Mueller	Martin		13133	13133-001-REC, TRN, PLC
Munk	Dave		11503	11503-001-ALT, REC, FWL, RLT; 11503-002-CON, SOC, REC, FWL, PRC, RLT; 11503-003-ALT, CON, SOC, REC, FWL, PRC, RLT; 11503-004-ALT, REC, FWL, PRC
Munro	Manuel		12066	12066-001-OIL, MIN; 10267-005-PRC
Murrish	William	Recreational Aviation Foundation and Colorado Pilots Association	1628	1628-001-REC, TRN, ALT; 1628-002-PLC, REC, TRN, ALT
Nadeau	John		1633	1633-001-REC, TRN, ALT; 1633-002-PLC, TRN, REC, ALT; 1633-003-ALT, REC, TRN; 1633-004-CON
Narracci	Robert		11531	11531-001-CON, REC, TRV, WSR; 11531-002-ALT, PLC, WTR; 11531-003-ALT, REC, PLC, WTR; 11531-004-ALT, REC, WTR, PLC; 11531-005-ALT, OIL, SOC, WTR, AIR, REC; 11531-006-PLC, REC, CON, WTR; 11531-007-PRC, CON, TRV; 11531-008-PLC, TRV; 11531-009-REC, GRZ, FWL; 11531-010-TRV, FWL; 11531-011-TRV, PLC, REC; 11531-012-ACC, PLC, REC, TRV; 11531-013-WSR, CON, PLC, ALT; 11531-014-WSR, ALT, CON, WTR, REC; 11531-015-ALT, WTR, WSR; 11531-016-ALT, MIN, OIL, TRV, REC; 11531-017-ALT, AIR, TRV, RNW, OIL, VEG, WTR, WSR; 11531-018-ALT, WTR, WSR, REC; 11531-019-TRV, PLC, REC, WSR
Nass	Daniel		1015	1015-001-ALT, OIL, SOC

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Nass	Daniel		11477	11477-001-ALT, MIN, OIL; 11477-002-SOC, OIL, MIN, PHS
Neese	Jerry		11126	11126-001-TRV, REC; 11126-002-ALT, PRC, TRV, REC
Nelson	Mike		11133	11133-001-PRC; 11133-002-PRC, TRV, REC
Nelson	Randy		14009	14009-001-OIL, SOC
Neubecker	Kendrick		11523	11523-001- ALT, PRC, SOC; 11523-002- WTR, ALT, REC, FWL, VEG, SSS, PRC; 11523-003- WTR, VEG, ATL; 11523-004- WTR, FWL, OIL, VEG, PRC, SOC; 11523-005- VEG, FOR, ATL; 11523-006-FWL, ALT, WTR, PLC, PRC; 11523-007-WTR, CON, PRC; 11523-008-SSS, FWL, ALT, PRC, CON; 11523-009-CON, SSS, FWL, ALT, PRC; 11523-010-WTR, SSS, FWL, PRC; 11523-011-ACC, ALT, PLC, SSS, PRC; 11523-012-ACC, ALT, SSS, PRC; 11523-013-ACC, ALT, VEG, WTR, CON, PRC; 11523-014- WSR, ALT, REC, PLC, PRC; 11523-015- WSR, ALT, REC, PLC, SSS, PRC; 11523-016- WSR, CON, ALT, WTR, PLC, PRC; 11523-017-WSR, CON, ALT, SOC, PRC; 11523-018-WSR, PLC, ALT, SOC, PRC; 11523-019-ALT, SOC, PRC, WTR, FWL, VEG, SSS
Newitt	Cody		1073	1073-001-OIL, PLC, SOC; 1073-002-OIL, PLC, PRC, CON; 1073-003-ALT, OIL, SOC
Newton	Virginia		1802	1802-001-PLC, TRN, REC, FWL
Nichols	Anthony		1630	1630-001-ALT, REC, TRN; 1630-002-VEG, TRN, WFM; 1630-003-REC, TRN, ALT
Nichols-Alivs	Susan		12057	12057-001-PLC, REC, TRV; 12057-002-ALT
Nims	Clarke		11438	11438-001-ALT, REC, FWL, PLC
no name			1105	1105-001-SOC; 1105-002-SOC; 1105-003-RLT; 1105-004-SCO
no name			11100	11100-001-PLC, REC, TRV, SOC; 11100-002-TRV, REC, PLC
Norman	Jerry and Kathy		1622	1622-001-REC, TRN, PLC, ALT; 1622-002-REC, TRN, PHS
Norris	Randall		12052	12052-001-ALT, OIL, MIN; 12052-002-OIL, MIN, SOC; 12052-003-PHS, OIL, MIN; 12052-004-PRC, SOC
O-	C-		1040	1040-001-OIL, RNW, SOC; 1040-002-ALT, OIL, SOC; 1040-003-OIL, SOC
O?	S?		11979	11979-001-AIR, SOC, OIL; 11979-002-AIR, SOC; 11979-003-ALT, LWC; 11979-004-PRC

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Occhionero	Matt		11132	11132-001-REC, TRV
Ogilby	Chuck	Thompson Divide Coalition	13006	13006-001-OIL, PLC; 13006-002-WTR, OIL, SOC; 13006-003-OIL, SOC, CON; 13006-004-FWL, OIL, WTR, REC, GRZ, AIR, SOC, ALT
O'Kelly	Cody		21	021-001-PLC, REC, TRV, SOC
O'Kelly	Cody		22	022-001-PLC, REC, TRV
Oliver	Andrew		1138	1138-001-OIL, ALT, SOC; 1138-002-OIL, ALT, SOC
Oliver	Paul		1954	1954-001-REC, TRN, SOC, PLC
Olsen	Norma		13207	13207-001- FWL, REC, PLC, ALT; 13207-002- REC, PLC, FWL, ALT
Olsen	Norma		13332	13332-001-FWL, PLC, REC
Olson	Ryan		1001	1001-001-OIL
Olson	Shane		1707	1707-001-REC, ALT, PLC, TRN
Olson	Ryan		11378	11378-001-SOC, MIN, OIL, PRC
Ortega	Efren		12059	12059-001-OIL, MIN, SOC
Ortiz	Hector		12070	12070-001-PRC; 12070-002-OIL, MIN, ALT, REC, SOC; 12070-003-AIR, CON, PRC, SOC; 12070-004-OIL, MIN, PRC, CON
Osborn	Kelly		11353	11353-001-REC, TRV, PLC; 11353-002-PRC
Otte	Gail		11455	11455-001-REC, PLC, FWL
Overhult	Tim		1027	1027-001-OIL, RNW, PRC; 1027-002-OIL, RNW, PRC; 1027-003-OIL, RNW, PRC, SOC
Owen	Barbara		11339	11339-001-PLC, MIN, OIL, SOC; 11339-002-OIL, MIN, SOC; 11339-003-OIL, MIN, SOC, PRC
P-	Eric		1032	1032-001-SOC; 1032-002-SOC, OIL, PLC
Paben?	Brett		1037	1037-001-OIL, REC, SCO
Page	Michael		12071	12071-001-PRC, OIL, MIN, CON; 12071-002-OIL, MIN, PHS, PRC
Paladino	Charles		11255	11255-001-SOC, PRC, OIL, MIN, PLC



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Palmer	Adam	Hardscrabble Trails Coalition	11524	11524-001-PLC, TRV, PRC; 11524-002-PLC, TRV, PRC; 11524-003-TRV, PRC, SOC, CON; 11524-004-PLC, REC, TRV, PRC, SOC, CON; 11524-005-PHS, PLC, REC, TRV, PRC, SOC, CON; 11524-006-REC, TRV, PLC, PRC, SOC, CON; 11524-007-REC, TRV, PRC, CON; 11524-008-REC, TRV, PRC, CON, PLC; 11524-009-REC, TRV, PRC, CON, PLC, SSS, FWL; 11524-010- REC, TRV, PRC, CON, PLC; 11524-011-REC, TRV, PRC, CON, PLC; 11524-012-REC, TRV, PRC, CON, PLC; 11524-013-PLC, SSS, VEG, TRV, VIS, OIL; 11524-014-SSS, VEG, TRV; 11524-015-SSS, VEG, TRV; 11524-016-SSS, VEG, TRV, ALT, PRC, SOC, REC, CON; 11524-017-SSS, VEG, TRV, ALT, PRC, SOC, PLC, REC; 11524-018 -TRV, ALT, REC; 11524-019 -PLC, TRV, ALT, REC, PRC, CON; 11524-020 -REC, TRV, ALT, PRC, CON; 11524-021 -REC, PLC, PHS, TRV, ALT, PRC, CON; 11524-022 -REC, PLC, PHS, TRV, ALT, PRC, CON; 11524-023 -REC, PLC, TRV, ALT, PRC, CON; 11524-024 -REC, PLC, TRV, ALT, PRC, CON; 11524-025 -REC, PLC, TRV, ALT, PRC, CON; 11524-026 -REC, PLC, TRV, ALT, PRC, CON; 11524-027 -REC, PLC, TRV, ALT, PRC, CON; 11524-028 -REC, PLC, TRV, ALT, PRC, CON; 11524-029 -REC,TRV, ALT, PRC, CON, PLC; 11524-030 -REC,TRV, ALT, PRC, CON, SOC; 11524-031 -REC,TRV, ALT, PRC; 11524-032-REC,TRV, ALT, VEG; 11524-033-REC,TRV, ALT; 11524-034-REC,TRV, ALT; 11524-035-REC,PLC,ALT
Palmer	Donald and Randall		17009	17009-001-ALT, PLC, REC, VIS; 17009-002-PLC, WTR, MIN; 17009-003-PLC, ACC
Parker	Virginia		13210	13210-001- PLC, FWL, REC, GRZ, FWL, ALT
Parks	Andy		1960	1960-001-REC, ALT, PLC, TRN
Parrington	Pamela		1245	1245-001-OIL, SOC, PRC; 1245-002-SOC, PRC, ALT
Patrick	Robert		17014	17014-001-REC, TRN, PLC; 17014-002-REC, TRN
Paulson	Chad		11327	11327-001-PLC, REC, TRV

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Pazdra	Paul		1217	1217-001-ALT; 1217-002-SOC, OIL, FWL; 1217-003-ALT, PRC, OIL, SOC; 1217-004-ALT, SOC
Pederson	Rover		11120	11120-001-PRC; 11120-002-TRV, PRC; 11120-003-TRV, FWL, REV, CAV; 11120-004-TRV, REC; 11120-005-SOC, REC, TRV; 11120-006-PRC; 11120-007-PRC, TRV, REC; 11120-008-ALT
Pendleton	Steve		11222	11222-001-REC, TRV, PRC
Pennington	David		1053	1053-001-OIL, SOC
Pepping	Mary		17020	17020-001-REC, TRN; 17020-002-REC, TRN; 17020-003-REC, TRN, PHS
Perkin	Bruce		13116	13116-001-REC, TRN, SOC; 13116-002-REC, TRN
Perry	Marjorie	; and William Fales	11360	11360-001-PLC, GRZ, TRV, LWC, ACC; 11360-002-REC, TRV, OIL, MIN, LWC, TRN, PRC; 11360-003-MIN, OIL, CUM, WTR, AIR, REC, TRV; 11360-004-GRZ, ACC, VEG, REC, TRV; 11360-005-REC, TRV; 11360-006-GRZ, SOC, WTR, VEG, FWL, REC, TRV, PLC; 11360-007-GRZ; 11360-008-REC, TRV, FWL, VEG, GRZ, SOC; 11360-009-PLC, ACC, FWL, VEG, TRV, TRN, REC; 11360-010-REC, TRV, VEG; 11360-011-TRV, REC, SOI, FWL, VEG; 11360-012-REC, TRV, PLC, OIL, LWC; 11360-013-PLC, TRV, REC, FWL, VEG, GRZ; 11360-014-PRC, WSA, LWC, OIL, MIN, ACC, REC, TRV, FWL, VEG, SOC
Pershall	Dean		14037	14037-001-OIL, PRC
Pestaina	Felipe		1320	1320-001-MIN, OIL, SOC
Peters?	Ken		1055	1055-001-OIL, SOC
Petersen	Bonnie	Club 20	17261	17261-001-PRC, SOC; 17261-002-ALT, PRC, SOC, OIL
Peterson	Chut		1216	1216-001-SOC; 1216-002-SOC, OIL; 1216-003-CUM, SOC; 1216-004-ALT, OIL, SOC; 1216-005-RNW, OIL
Peterson	Raymond		13121	13121-001-REC, TRN; 13121-002-REC, TRN, PLC, SCO
Petosa	Louise		11334	11334-001-PLC, TRV, REC; 11334-002-REC, PHS
Phelps	James		1103	1103-001-ALT, FWL, SSS; 1103-002-FWL, SSS, ACC; 1103-003-FWL, SSS

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Philip	Susan	Town of Basalt	11615	11615-001-PRC; 11615-002-PLC; 11615-003-PLC, PRC, CON, REC, GRZ, FWL, TRV; 11615-004-TRV, PRC, REC, FWL, CON; 11615-005-PRC, CON; 11615-006-ALT, TRV, REC, PLC; 11615-007-ALT, TRV, REC, RLT, CON, PLC; 11615-008-PLC, GRZ; 11615-009-REC, PLC, FWL, ACC, TRV; 11615-010-RLT, PLC; 11615-011-WTR; 11615-012-PRC, PLC; 11615-013-CON, TRV; 11615-014-ALT
Pirzadeh	Abdi		11317	11317-001-REC, TRV, ALT, PLC, PRC
Pittman	Roger		11350	11350-001-REC, PRC
Plunar	Jason		1407	1407-001-SOC, ALT; 1407-002-AIR
Pokrandt	Jim		11506	11506-001-REC; 11506-002-REC; 11506-003-REC, TRV, SOC, PRC
Pollack	Gail		11212	11212-001-PRC, PLC; 11212-002-ALT; 11212-003-WTR, PLC, SSS; 11212-004-AIR, PLC, MIN, OIL; 11212-005-PLC, REC, TRV, SOC, FWL, GRZ; 11212-006-MIN, OIL, SOC, PLC, TRN; 11212-007-PLC, FWL, LWC; 11212-008-OIL, MIN, ALT
Pond	Wallace		13110	13110-001-REC, TRN, SOC; 13110-002-REC, TRN, PHS; 13110-003-REC, TRN, TRV
Pool	Fred		1627	1627-001-REC, TRN, PLC, PRC; 1627-002-PHS, REC, TRN; 1627-003-ALT, TRN, REC
Porter	Allan		11325	11325-001-PLC, REC; 11325-002-TRV, REC, PLC, SOC, VIS, ALT; 11325-003-PLC, REC, TRV, VIS, VEG; 11325-004-PLC, TRV, REC, VIS, VEG, FWL, LWC, ALT; 11325-005-PLC, ALT, TRV, REC; 11325-006-PLC, TRV, REC; 11325-007-PRC
Porzak	Glenn	Upper Colorado Entities	11329	11329-001-WSR, ALT, WTR, PRC; 11329-002-ALT, PRC
Post	Gordon B.		1021	1021-001-RNW, OIL; 1021-002-FWL, SSS, ALT, ACC
Post	Gordon		11483	11483-001-PRC, OIL, MIN; 11483-002-ALT, FWL, SSS; 11483-003-ACC, SSS, FWL, PRC
Potter	Jack		11224	11224-001-OIL, MIN, SOC
Potter	John		11246	11246-001-REC, TRV, PRC; 11246-002-PLC, WSA, REC, TRV, PRC; 11246-003-PRC, TRV, REC
Potter			14066	14066-001-OIL
Povenmire	King		13118	13118-001-REC, TRN

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Powell	George		1642	1642-001-ALT, REC, TRN, PLC; 1642-002-REC, TRN, ALT; 1642-003-CON
Powell	Kent		12086	12086-001-SOC, OIL, MIN
Prieto	Romiro		1126	1126-001-OIL; 1126-002-SOC
Pritchard	Mike	Roaring Fork Mountain Bike Association	11247	11247-001-CON, REC, TRV; 11247-002-PLC, TRV, REC; 11247-003-PLC, TRV, REC, PHS, VEG; 11247-004-ALT, TRV, REC, PLC; 11247-005-PLC, TRV, REC, PHS; 11247-006-ALT, TRV, REC; 11247-007-PLC, TRV, REC, PHS, FWL, VEG; 11247-008-ALT, TRV, REC; 11247-009-PLC, TRV, REC; 11247-010-PLC, TRV, REC; 11247-011-ALT, REC, TRV; 11247-012-PLC, TRV, REC, VEG; 11247-013-ALT; 11247-014-PLC, TRV, REC; 11247-015-CON, ALT, TRV, REC, PLC
Pritchard	Mike	Roaring Fork Mountain Bike Association	11502	11502-001-PLC, REC, CON, ALT; 11502-002-PHS, REC, FWL, TRV, PLC, LWC, RLT, ALT; 11502-003-CLC REC, TRV, PLC, LWC, RLT, ALT; 11502-AZ-004-ALT, CON, REC, TRV, PLC; 11502-AZ-005-ALT, REC, TRV, PLC, PHS
Quest	Joan		12028	12028-001-OIL, MIN, SOC, PRC
Quintare	Raul		1400	1400-001-SCO
Raczak	Jan		11403	11403-001-REC, FWL, PLC; 11403-002-PRC; 11403-003-REC, PLC
Ramagli	Thomas		11223	11223-001-TRV, REC, PRC
Raney	Mariah		1207	1207-001-PHS, PRC, OIL; 1207-002-PHS, RNW; 1207-003-OIL, PHS, PRC
Raney	Becky		11454	11454-001-OIL, PRC; 11454-002-OIL, SOC, PRC; 11454-003-PRC, SOC, OIL; 11454-004-PRC, OIL, ALT, SOC; 11454-005-OIL, PRC, PHS; 11454-006-PRC, SOC, OIL, ALT
Rau	Brian		1619	1619-001-REC, TRN, PLC, ALT
Ray	Robert		13217	13217-001- REC, TRN, ALT; 13217-002- REC, TRN, ALT
Ray	Robert		17010	17010-001-REC, TRN, PLC
Rayster	Jacob		11922	11922-001-OIL, SOC
Reece	Lisa	Maine Aeronautics Association	13009	13009-001-REC, TRN, PLC, PHS, SCO
Reed	Jason		1079	1079-001-OIL, CON; 1079-002-AIR, CON, PRC
Reed	Steve		11137	11137-001-PRC; 11137-002-REC, TRV, PRC
Reed	Edward		12017	12017-001-OIL, MIN, SOC
Reid	James		11920	11920-001-OIL, SOC
Reider	Norman		1084	1084-001-OIL, PRC

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Last Name	First Name	Organization	Letter ID	Comment ID Codes
			Code	
Reiner	Josh		1008	1008-001-ALT, WSA, LWC
Reiner	Josh		11470	11470-001-ALT, PRC; 11470-002-ALT, LWC, WSA, PRC
Renney	Veronica		1212	1212-001-AIR; 1212-002-PRC, RNW, SCO
Rexford	Bill		11006	11006-001-REC, TRV, PRC, ALT; 11006-002-PR, TRC, REC, ALT
Reyes	Fernando		11914	11914-001-OIL; 11914-002-OIL, SOC
Reyes	Jose		12062	12062-001-SOC, OIL, MIN, ALT
Reynolds	Evelyn		1406	1406-001-OIL, AIR, SCO
Reynolds	Thomas		1907	1907-001-REC, ALT, PLC, TRN
Rhea	Susan	Citizens Group	10	010-001-ALT; 010-002-OIL, CUM, PRC; 010-003-PRC, ALT; 010-004-CLC, MIN, OIL
Rhodes	Patrick		1615	1615-001-ALT, REC, TRN; 1615-002-REC, PLC, ALT; 1615-003-CON
Rice	Mandy		1412	1412-001-PRC; 1412-002-ALT, OIL, SOC; 1412-003-SOC, OIL, ALT
Richards	Jacob		11621	11621-001-OIL, MIN, PRC, TRN, AIR, ALT
Richards	James		13128	13128-001-REC, TRN, SCO
Rimel	Lee		13213	13213-001- PLC, REC, LWC, TRV, ALT
Rivas	A...?		12065	12065-001-OIL, MIN, AIR, PHS
Roadup	Chris		11949	11949-001-AIR, OIL, PHS; 11949-002-OIL, SOC; 11949-003-OIL, CON; 11949-004-AIR
Roberts	Corey		1110	1110-001-SOC; 1110-002-OIL, SOC; 1110-003-SOC, RLT; 1110-004-OIL
Roberts	Katelyn		11101	11101-001-PRC; 11101-002-ALT, SOC, OIL; 11101-003-MIN, OIL, SOC, CUM; 11101-004-OIL, SOC, SOC; 11101-005-ALT, SOC, PRC, OIL, MIN
Roberts	Katelyn		11462	11462-001-PRC, OIL; 11462-002-ALT, SOC, OIL; 11462-003-OIL, SOC; 11462-004-OIL, SOC, REC, ALT
Roberts	Milton		11941	11941-001-OIL, SOC; 11941-002-OIL, AIR, SOC, PHS; 11941-003-OIL, SOC; 11941-004-OIL, SOC; 11941-005-OIL, SOC; 11941-006-OIL
Rock	Gordon		1910	1910-001-TRN, REC, PLC
Rock	Gordon		11437	11437-001-REC, TRN, PLC, PHS, SOC
Rock	Gordon		11974	11974-001-REC, TRN, PLC
Rodriguez	Gilbert		1016	1016-001-OIL, PRC; 1016-002-OIL, AIR, SOC
Rodriguez	Gilbert		11478	11478-001-OIL, MIN; 11478-002-OIL, MIN, PRC, AIR, SOC
Roehm	Daric		1004	1004-001-OIL
Roehm	Troy		1068	1068-001-OIL, PRC, SOC

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Roehm	Daric		11466	11466-001-PRC, OIL, MIN
Rogers	Jay		11345	11345-001-REC, PRC
Rollf	John		11385	11385-001-REC, TRN; 11385-002-TRN, REC, PLC, PHS; 11385-003-SOC, PRC, TRN, REC; 11389-002-PHS, TRN
Romano	Patrick		1927	1927-001-REC, ALT, PLC, TRN
Romero	Thomas		1013	1013-001-ALT, OIL, SOC; 1013-002-OIL
Romero	Thomas		11475	11475-001-OIL, MIN; 11475-002-ALT, OIL, MIN, SOC, PRC; 11475-003-SOC, OIL, MIN; 11475-004-MIN, OIL
Rose	Mary		11340	11340-001-PLC, TRV, REC, FWL
Rosenblum	Mary		1636	1636-001-ALT, TRN, REC; 1636-002-PHS, TRN; 1636-003-PLC, TRN, REC; 1636-004-TRN, REC, SCO
Rowe	Roberta		14010	14010-001-OIL, SOC
Rowser	Brent		11383	11383-001-REC, TRN, SOC; 11383-002-SOC, TRN, REC, PRC
Rubino	Bob		1926	1926-001-REC, ALT, PLC, TRN
Rudolchick	Doug		11123	11123-001-PRC, TRV, REC; 11123-002-TRV, TRN, WFM, PHS; 11123-003-PLC, WFM, SOC, TRV, REC
Rudy	Joseph		11249	11249-001-REC, TRV, LWC, PRC
Ruchmann	Mark		25	025-001-REC, PLC; 025-002-PLC, PRC
Rueter	Curtis	Noble Energy, Inc.	11642	11642-001-PRC; 11642-002-FWL, WTR, ALT; 11642-003-ALT, FWL, OIL, MIN; 11642-004-ALT, FWL, WTR; 11642-005-FWL, CON; 11642-006-SSS, CON; 11642-007-FWL, CON, OIL, MIN; 11642-008-ALT, WTR, FWL; 11642-009-ALT, FWL; 11642-010-ALT, OIL, MIN, FWL; 11642-011-ALT, WTR, FWL; 11642-012-ALT, SSS; 11642-013-SSS, FWL; 11642-014-FWL, WTR; 11642-015-LWC; 11642-016-FWL, SSS; 11642-017-SSS; 11642-018-FWL, SSS; 11642-019-FWL; 11642-020-PRC
Ruiz	Ismael		12060	12060-001-ALT, OIL, MIN, SOC; 12060-002-OIL, MIN, ALT, ACC, SOC
Ruiz	Adan		12074	12074-001-SOC, OIL, MIN, PRC; 12074-002-ALT, PRC
Rutkowski	Tony		1046	1046-001-PRC, OIL
Rutledge	Will		11124	11124-001-PRC; 11124-002-ALT, PRC, TRV, REC
Ruy	Jesus		14044	14044-001-OIL, SOC
Rytting	Matt		17016	17016-001-REC, TRN, PLC, SCO
Salazar	Rafael		1077	1077-001-OIL, FWL; 1077-002-OIL, SOC, PHS

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Salinas	Junior		1003	1003-001-OIL, SOC
Salinas	Junior		11465	11465-001-SOC, OIL, MIN, PRC
Sampels	Angela		13208	13208-001- OIL, PLC, WTR, ALT; 13208-002- OIL, PHS, PLC, FWL, ALT; 13208-003- AIR, WTR, REC, FWL, OIL, ALT
Sampels	Angela		13330	13330-001-PLC, OIL, MIN, SOC, PRC, ALT; 13330-002-PRC, WTR; 13330-003-PRC, CON, SOC, OIL, MIN; 13330-004-PRC, OIL, MIN, WTR, TRN, SOC, PHS; 13330-005- TRN; 13330-006-PRC, AIR, WTR, REC, FWL
Sampson	Wyatt		1022	1022-001-OIL, SOC; 1022-002-AIR, OIL, PRC; 1022-003-PRC, OIL, SOC
Sampson	Wyatt		11484	11484-001-PRC, OIL, MIN; 11484- 002-PRC, AIR; 11484-003-PRC, SOC, OIL, MIN
Samuleson	Kirk		1948	1948-001-REC, TRN, PLC, SCO
Sappington	Steve		1940	1940-001-REC, TRN, PLC, SCO
Sarchet	Levi		14041	14041-001-ALT, LWC, PRC, SOC
Sbarra	BJ		11019	11019-001-ALT, PLC, REC; 11019- 003-PLC, ALT; 11020-002-REC, ALT, PRC, SCO
Schachter	Sumner		13202	13202-001-PLC, ALT; 13202-002- PLC, REC, ALT, WTR, AIR, FWL; 13202-003-REC, FWL, OIL, SOC, ALT; 13202-004-PLC, OIL, FWL, VEG, ALT; 13202-005-PLC, VEG, FWL, SSS, ALT, OIL
Schantz	Matt		1635	1635-001-ALT, REC, TRN; 1635-002- REC, TRN; 1635-003-PLC, ALT, TRN, REC, PHS; 1635-004-CON
Schaub	Phil		12024	12024-001-OIL, MIN, SOC
Schippet	James		11956	11956-001-SOC, OIL; 11956-002- OIL, SCO
Schmidt	Ronnie		1419	1419-001-OIL
Schmidt	Ernest		1950	1950-001-REC, TRN, PLC
Schneider	Joel		1821	1821-001-PHS, TRC, REC, SOC, PRC
Scholl	Duane	Middle Park Water Conservancy District	12001	12001-001-PLC, WTR, REC; 12001- 002-CON, WSR, WTR, ALT, PRC
Schreiber	Kurt		1136	1136-01-ALT, SOC
Schriner	Steve		16000	16000-001-OIL; 16000-002-ALT, OIL, SOC; 16000-003-OIL, SOC; 16000-004-OIL
Schulte	Vicki		1431	1431-001-SOC, OIL, MIN
Schumacher	Jo		1902	1902-001-REC; 1902-002-REC, TRN, PLC; 1902-003-TRN, REC; 1902-004- TRN, REC; 1902-005-PRC, REC

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Schwarz	Kurt	Maryland Ornithological Society	11605	11605-001-FWL, VEG; 11605-002-REC, SOC; 11605-003-REC; 11605-004-FWL; 11605-005-ALT; 11605-006-ALT, OIL, MIN, FWL, LWC, WSR; 11605-007-FWL, MIN, OIL, TRV, REC, LWC, ACC, ALT, WSR; 11605-008-ALT, TRV, REC, FWL; 11605-009-TRV, ALT, FWL, REC; 11605-010-ALT, PRC, FWL, LWC, WSR
Schwenke	Diane	Grand Junction Area Chamber of Commerce	13331	13331-001-SOC, PRC, OIL, ALT
Scott	Daniel		11141	11141-001-PRC, REC, TRV
Scott	Mark		11507	11507-001-REC, TRN, PHS
Seevers	John		1803	1803-001-SOC, TRN, REC, SOC; 1803-002-TRN, REC, PHS, WFM; 1804-003-REC, TRN, PRC
Seibold	John	Grand Canyon Valle Airport	1629	1629-001-REC, TRN, ALT, PLC; 1629-002-PHS, REC, TRN; 1629-003-CON
Self	Andrew		11259	11259-001-OIL, MIN, SOC, PRC
Severance	Chuck		11201	11201-001-ALT, SOC; 11201-002-SOC, PRC, REC, TRV; 11201-003-PLC, PRC, WSA; 11201-004-PRC, SOC, TRV, REC; 11201-005-REC, TRV, PRC; 11201-006-PRC
Sexton	Rich		11010	11010-001-PRC, REC, TRV; 11010-002-PRC, CSO; 11010-003-TRV, ALT, PRC, SOC; 11010-004-PRC; 11010-005-ALT, REC, TRV, PRC; 11010-006-REC, PRC
Seymour	Preston		1304	1304-001-MIN, OIL, PRC, SOC; 1304-002-SOC, MIN, OIL; 1304-003-SOC, PRC
Shaffer	Bruce		1215	1215-001-OIL, SOC; 1215-002-ALT, RNW; 1215-003-SOC, RNW, ALT
Shaw	James		13214	13214-001- REC, PHS, SOI, OIL, TRN; 13214-002- REC, TRN, PLC, ALT
Sheahan	Casey	Patagonia	1953	1953-001-PRC; 1953-002-PLC, WTR, SSS, FWL; 1953-003-AIR, OIL, PLC; 1953-004-PLC, REC, SOC, GRZ; 1953-005-PLC, OIL; 1953-006-FWL, VEG, SSS, PLC; 1953-007-PLC, FWL, SOC, AIR, WTR, GRZ, ALT, PLC
Sheets	J		11113	11113-001-TRV, REC, PRC
Shugart	Roger		17026	17026-001-PLC, WSA, OIL; 17026-002-OIL, PLC, WSA; 17026-003-WTR, AIR, PLC; 17026-004-PLC, TRN; 17026-005-WSA, OIL, WTR, AIR, FWL, ACC



**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Siefkes	Barbara	WPX Energy	11625	11625-001-OIL, MIN, SOC; 11625-002-OIL, MIN; 11625-003-AIR, OIL, MIN, CUM, PRC; 11625-004-AIR, MIN, OIL, ALT; 11625-005-AIR, MIN, OIL, CUM; 11625-006-AIR, CON, PRC, OIL, MIN; 11625-007-PHS, ALT, MIN, OIL; 11625-008-ALT, OIL, MIN, AIR; 11625-009-MIN, OIL, RNW, ALT; 11625-010-ALT, MIN, OIL, AIR; 11625-011-ALT, OIL, MIN, SOC, AIR; 11625-012-ALT, OIL, MIN, AIR; 11625-013-AIR, ALT, OIL, MIN; 11625-014-PRC, OIL, MIN, ALT, AIR; 11625-015-ALT, AIR, OIL, MIN; 11625-016-ALT, OIL, MIN, WTR, RLT; 11625-017-ALT, OIL, MIN, AIR, PRC, CON; 11625-018-ALT, OIL, MIN, AIR, SOC; 11625-019-SOC, ALT, OIL, MIN, PRC; 11625-020-OIL, MIN, CUM, ALT; 11625-021-OIL, MIN, ALT, PRC; 11625-023-PRC; 11625-024-CON; 11625-025-ALT; 11625-026-ALT, OIL, MIN; 11625-027-WTR, ALT; 11625-028-REC, TRV, ALT, OIL, MIN; 11625-029-AIR, ALT, OIL, MIN; 11625-022-ALT, OIL, MIN, WTR
Siegel	Olivia	Aspen Center for Environmental Studies	17124	17124-001-REC, PLC, FWL
Siegfried	Brandon		11021	11021-001-REC, ALT, TRV; 11021-002, REC, GRZ, ALT; 11021-003-REC, TRV; 11021-003-SOC, REC, ALT
Siegfried	Brandon		13505	13505-001-ALT, REC, PLC, PRC; 13505-002-ALT, GRZ, SOC, PRC, PHS; 13505-003-SOC, ALT, REC
Silengo	Chuck		14019	14019-001-OIL, SOC
Silfe	John		1430	1430-001-SOC, OIL, MIN
Silicz	Nick		1952	1952-001-REC, TRN, PLC
Simons	Travis		1236	1236-001-SOC, OIL, SOC; 1236-002-SOC, OIL, SCO
Simpson	Lee		1048	1048-001-REC, TRV, OIL
Simpson	Suprena		11023	11023-001-ALT, REC, CUM; 11023-002-PLC, REC, CUM, ALT
Simpson	Suprena		11235	11235-001-PRC
Simpson	Suprena		11236	11236-001-PRC
Sinclair	Dana		1503	1503-001-OIL, MIN, FWL; 1503-002-SOC, OIL, MIN; 1503-003-OIL, MIN, FWL, PRC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Sinden	Candys	Northern Colorado Water Conservancy District	11517	11517-001- WTR, PLC, ALT, WSR, PRC, SOC, REC; 11517-002-WSR, PLC, ALT, WTR, PRC, SOC; 11517-003- CON, ALT, PRC, SOC; 11517-004- WSA, ALT, PRC, SOC; 11517-005- WSR, PLC, ALT, PRC, SOC; 11517-006- WTR, PLC, ALT, PRC, SOC; 11517-007- FWL, PLC, ALT, PRC, SOC, VEG, CON; 11517-008- WSR, WTR, ALT, PRC, SOC, PLC
Sisneros	Caleb		1069	1069-001-ALT, OIL, SOC, PHS, CON
Six	Corey		11918	11918-001-OIL, SOC
Sjoerdsma	Craig		12084	12084-001-OIL, MIN, SOC
Skalla	Bill		12034	12034-001-ALT, OIL, MIN, SOC
Skellion	Mike	Avalanche Property Maintenance	17	017-001-PLC, REC, TRV, TRN
Skjerpen	Trevor		13405	13405-001-PRC, OIL, MIN; 13405-002-PRC, SOC, CON
Slade	Brian		11966	11966-001-OIL, SOC
Slappey	J.H.	East Canyon Creek, LLC	13222	13222-001-PLC, PHS; 13222-002- PLC,PHS, ALT; 13222-003- PLC,GRZ, VEG, ALT
Slaven	Gary		11131	11131-001-REC, TRV, PRC
Sloan	Kelly	Americans for Prosperity	17259	17259-001-PRC ALT, SOC, OIL
Slogan	Scott		11390	11390-001-PRC, FWL, REC
Sloyers	Donna		14012	14012-001-OIL, SOC
Smile	Michael		13218	13218-001- WSA, ALT
Smith	Steven A.		1222	1222-001-ALT, OIL, SOC; 1222-002- OIL, SCO
Smith	Matt		1319	1319-001-ALT, MIN, OIL, PRC; 1319-002-ALT, MIN, OIL, SOC

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

Last Name First Name		Organization	Letter ID Code	Comment ID Codes
Smith	Jerry		11415	11415-001-PRC, SOC, CON, ALT; 11415-002-ALT, REC, TRV; 11415-003-TRV; 11415-004-TRV, PRC; 11415-005-RLT, TRV, VIS; 11415-006-TRV, CUL; 11415-007-PRC, FWL, TRV; 11415-008-TRV; 11415-009-TRV, PRC; 11415-010-TRV; 11415-011-TRV, REC; 11415-012-TRV, REC; 11415-013-TRV, REC, WSA, SOC; 11415-014-TRV, SOC, REC; 11415-015-TRV, REC, CUL; 11415-016-PRC, TRV; 11415-017-TRV, REC, SOC; 11415-018-TRV, REC, SOC; 11415-019-SOC; 11415-020-TRV, CUL, VIS, SOC; 11415-021-OIL, RNW, SOC; 11415-022-VEG; 11415-023-TRV; 11415-024-TRV, CUL, WTR, VEG, FWL; 11415-025-TRV, REC; 11415-026-TRV, SOC, CON; 11415-027-TRV, PRC; 11415-028-TRV, REC; 11415-029-TRV, REC; 11415-030-TRV, CUL; 11415-031-ALT, REC, TRV; 11415-032-TRV, REC; 11415-032-TRV, REC; 11415-033-TRV, RLT; 11415-034-TRV; 11415-035-REC, TRV; 11415-036-TRV; 11415-037-TRV, ALT, REC; 11415-038-TRV, PRC, SCO
Smith	Pete		11514	11514-001-REC, ALT; 11514-002-REC, PHS, TRN, PLC, ALT
Smith	Kendall		11900	11900-001-REC; 11900-002-FWL, REC; 11900-003-PLC, REC; 11900-004-ALT, REC
Smith	Dennis	Oregon Pilots Association	13132	13132-001-REC, TRN, SOC, PHS, PRC
Smulka	Ann		11619	11619-001-PLC, TRV, REC, FWL
Solberg	Jesse		16006	16006-001-AIR, OIL, SOC, CON
Sornboroer	David		1963	1963-001-REC, ALT, PLC, TRN
Soto	Juancarlos		11118	11118-001-PRC, ALT, TRV, REC
Soychak	Steve	Grand Junction Economic Partnership	17249	17249-001-SOC, OIL, MIN; 17249-002-OIL, MIN, REC, SOC
Spach	Janet		13406	13406-001-OIL, PRC
Sparks	William	Beatty & Wozniak, P.C. on behalf of Dejour Energy (USA) Corp.	17255	17255-001-OIL; 17255-002-OIL, PRC, ALT, SOC; 17255-003-PRC, OIL, ALT; 17255-004-OIL, PRC; 17255-005-OIL, CUM; 17255-006-OIL, ALT, FWL, PRC, CUM; 17255-007-OIL, AIR, PRC; 17255-008-PRC, ALT, OIL; 17255-009-PRC, OIL, FWL, SSS; 17255-010-PRC, OIL, ALT
Spevber	Clark		11919	11919-001-OIL, SOC

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Spicer	William		1808	1808-001-REC, TRV, TRN, SOC; 1808-002-REC, TRV; 1808-003-REC, TRV, FWL, PLC, SSS; 1808-004-REC, TRV
Spinuzzi	Gary		11459	11459-001-REC, PLC, TRV, RLT, FWL, WTR
St. Pierne	Roni		11959	11959-001-ALT, SOC, OIL; 11959- 002-ALT, OIL; 11959-003-ALT, SOC
Staby	Paul		1931	1931-001-REC, TRN, PLC
Stahl	Barry		1813	1813-001-TRV, ALT, REC, PRC; 1813-002-FWL, REC, TRV, ALT, PRC; 1813-003-PLC, REC, TRV, ALT
Standhart	Gary		13101	13101-001-REC, TRN; 13101-002- REC, TRN, PHS
Stanhope	Jason		11368	11368-001-REC, TRV, PLC; 11368- 002-SOC, TRV, REC
Steel	Addison		1637	1637-001-ALT, REC, TRN
Steel	Todd		11241	11241-001-SOC; 11241-002-SOC, OIL, MIN; 11241-003-SOC
Steele	Meghan		1232	1232-001-RNW, SOC, SOC; 1232- 002-AIR, CON; 1232-003-CON, PRC
Steele	Brookelle		17015	17015-001-OIL, REC, AIR, WTR, FWL, SOC
Sten	Daniel		11365	11365-001-TRV, REC, PRC
Stephenson	Shane		11386	11386-001-REC, TRN
Stevens	Daniel		1020	1020-001-RNW, OIL; 1020-002-FWL, SSS; 1020-003-RNW, OIL, PRC
Stevens	Tom		11323	11323-001-PLC, REC, TRV; 11323- 002-PLC, ALT; 11323-003-TRN; 11323-004-REC, TRV; 11323-005- PLC, RLT, REC, TRV, TRN
Stevens	Daniel		11482	11482-001-MIN, OIL, ALT; 11482- 002-FWL, SSS; 11482-003-PRC, OIL, MIN
Stevens	Laurie	Thompson Divide Coalition	11600	11600-001-PRC, CON, PLC; 11600- 002-PLC, PRC, OIL, MIN; 11600- 003-PLC, PRC, FWL, VEG, WTR, SSS; 11600-004-PLC, SOC, REC, FWL; 11600-005-PLC, SOC, GRZ, REC, TRV; 11600-006-PLC, WTR, OIL, GAS; 11600-007-PLC, OIL, MIN, WTR, SOC, FWL, VEG, PRC; 11600-008-OIL, MIN, TRN, PRC; 11600-009-OIL, MIN, PLC, FWL, WTR, AIR, REC, GRZ, SOC, ALT, PLC, PRC
Stevens	Evan		11917	11917-001-OIL, SOC
Stewart	John		11362	11362-001-PRC; 11362-002-PLC, REC; 11362-003-REC, PHS, SOC, TRV; 11362-004-REC, TRV
Stoerr	Jacques		11396	11396-001-ALT, PLC, FWL, TRV, TRN, PRC
Stonecipher	Wayne		1913	1913-001-REC, TRN

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Organization		Letter ID	Comment ID Codes
Last Name	First Name	Code	
Stryker	Edwin	1819	1819-001-TRN, REC, PHS
Stubbs	Shannon	1420	1420-001-OIL, PLC
Stucklen	Robert	13111	13111-001-REC, TRN, PLC, SCO
Sullivan	Cynthia	1301	1301-001-OIL, MIN, PHS
Sullivan	Cynthia	1305	1305-001-ALT, PRC, MIN; 1305-002-ALT, MIN, OIL, SOC, PRC
Sundgren	Kent	11109	11109-001-TRV, REC; 11109-002-PRC; 11109-003-TRV, PRC; 11109-004-TRV, FWL, CAV; 11109-005-ALT; 11109-006-ALT, PRC; 11109-007-TRV, FWL, VEG; 11109-008-PLC, REC, WSA; 11109-009-TRV, REC; 11109-010-PLC, TRV, TRN; 11109-011-LWC, ACC; 11109-012-PRC, FWL
Sutherland	Lee	11535	11535-001-REC, TRN, PHS
Sutherland	Chip	14061	14061-001-CON, OIL, ALT, SOC
Sutterfield	Karl	11649	11649-001-TRN, SOC
Swallo	Kris	1244	1244-001-AIR, ALT, CON; 1244-002-OIL, ALT
Swanberg	Chuck	13215	13215-001- REC, PHS, TRN, ALT
Swofford	Joseph	1074	1074-001-OIL, PRC, ALT
Takos	Jeff	15016	15016-001-OIL, MIN, SOC; 15016-002-AIR, OIL; 15016-003-SOC, OIL, ALT; 15016-004-OIL; 15016-005-PHS, OIL; 15016-006-PRC
Talbott	Russell	11640	11640-001-SOC; 11640-002-REC, TRV, ALT; 11640-003-TRN; 11640-004-RLT, PLC; 11640-005-REC, ALT; 11640-006-PRC, ALT; 11640-007-MIN, SOC, OIL
Tanis	Randy	11921	11921-001-OIL, SOC
Taylor	Lisa	11244	11244-001-OIL, MIN, SOC
Taylor	Leslie	11405	11405-001-REC, PLC, TRN; 11405-002-TRN, REC, PHS; 11405-003-TRN, REC, PHS, SOC
Taylor	Zack	11406	11406-001-PLC, REC; 11406-002-PLC, PRC
Taylor	Andrew	11450	11450-001-REC, RLT, CUL, OIL, VEG, FWL, WTR, AIR, PLC, MIN; 11450-002-REC, PLC, ALT
Teague	Jo	11250	11250-001-TRV, REC, PRC
Terry	Tyler	1436	1436-001-PRC, OIL, MIN, AIR; 1436-002-PRC; 1436-003-OIL, MIN, SOC, ALT, PRC
Terry	Jim	13005	13005-001-REC, TRN, PLC, SCO
Terry	Jim	13008	13008-001-REC, TRN, PLC, SCO
Thew	Jim	11947	11947-001-OIL, SOC; 11947-002-ALT, OIL, SOC, MIN
Thomas	Mitch	1014	1014-001-PRC, OIL, SOC
Thomas	J.	1504	1504-001-OIL, MIN, PRC; 1504-002-OIL, MIN, SOC; 1504-003-OIL, MIN

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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Thomas	Mitch		11476	11476-001-PRC
Thomas	Chris	Community Hospital	17032	17032-001-PRC; 17032-002-PHS, OIL, SOC; 17032-003-ALT, SOC; 17032-004-ALT, SOC; 170317033-004-OIL, AIR
Thompson	Jesse		11022	11022-001-PLC, TRV, ALT; 11022-002-PLC, TRV, REC, ALT; 11022-003-REC, PLC, ALT; 11022-004-REC, PLC, TRV, CLC
Thompson	Jack		11382	11382-001-REC, TRN, PLC; 11382-002-PHS, TRN
Thuillier	Michael	Colorado Back Country Trail Riders Alliance	11511	11511-002-PLC, TRV, REC, ALT
Thurston	Matt		16003	16003-001-OIL, SOC; 16003-002-ALT, OIL; 16003-003-OIL, ALT, SOC
Till	Kenneth		1230	1230-001-PRC, WTR; 1230-002-PRC, WTR, ALT, OIL, SOC; 1230-003-SOC, PRC
Tolley	Sam		1010	1010-001-OIL, REC, SOC; 1010-002-OIL, SOC
Tolley	Sam		11472	11472-001-MIN, OIL, REC; 11472-002-OIL, MIN, SOC, PLC
Torres	Ted?		1029	1029-001-OIL, PLC, SOC; 1029-002-OIL, SOC; 1029-003-OIL, REC, SOC
Trane	Fleming	Citizens Group, Thompson Divide Coalition	11806	11806-001-PLC, OIL, WTR, AIR, FWL, REC, GRZ, SOC, PRC
Trantow	George D.		16	016-001-ALT; 016-002-ALT, REC, TRV, TRN, SOC, PLC; 016-003-ALT, PRC, PLC; 016-004-ALT, PLC, SOC, TRV, REC; 016-005-ALT, REC, PLC, SOC; 016-006-ALT, PHS, REC, TRV, PLC; 016-007-ALT, REC, PLC; 016-008-ALT, TRV, TRN, PLC; 016-009-ALT, SOC, PHS, REC, TRV, TRN, PLC
Travis	Tom		1080	1080-001-ALT, OIL, SOC, PHS; 1080-002-OIL, PHS; 1081-001-AIR, PRC, CON; 1081-002-RNW, PHS
Truitt	Shane		13412	13412-001-OIL, MIN, SOC
Tucker	Darren		11645	11645-001-ALT, FWL; 11645-002-REC, TRV, FWL
Tucker	Kevin		12082	12082-001-PRC, OIL, MIN; 12082-002-ALT, OIL, MIN
Turnbull	Tom and Roz	Four Bar Ranch	1814	1814-001-PRC; 1814-002-PRC, ALT; 1814-003-ALT, PLC, GRZ; 1814-004-ALT, PLC, REC, TRV, GRZ; 1814-005-TRN, PLC, REC, TRV; 1814-006-REC, TRV, TRN, ALT, VEG; 1814-007-TRN, PLC, TRV, ALT, REC, WTR; 1814-008-REC, TRV, FWL, GRZ; 1814-009-PRC, ALT

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<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Turner	Trina		11208	11208-001-REC, TRV, PRC; 11208-002-SOC, TRV, REC; 11208-003-REC, TRV; 11208-004-PRC, REC, TRV
Turner	Casey		14048	14048-001-OIL, SOC
Turpie	Bill		11104	11104-001-REC, TRN, SOC, PRC; 11104-002-PLC, REC, TRN
Urenda	Pablo		11969	11969-001-FWL, SSS, CON, SOC
Urie	Kevin	Denver Water	1943	1943-001-WTR; 1943-002-WTR, PLC; 1943-003-ALT, WTR; 1943-004-WTR, ALT; 1943-005-WTR, PLC; 1943-006-WTR; 1943-007-WTR, WSR, REC; 1943-008-REC; 1943-009-ALT, REC, WTR; 1943-010-WSR; 1943-011-WSR, REC; 1943-012-ALT, WSR, REC, WTR; 1943-013-WSR, ALT; 1943-014-WSR, REC, FWL; 1943-015-ALT, WSR; 1943-016-WTR; 1943-017-WTR, REC, WSR; 1943-018-ALT, REC, WTR
Utter	Mike		11220	11220-001-REC, TRV, SOC; 11220-002-REC, TRV
Uyehara	Annie		11426	11426-001-OIL, PLC; 11426-002-OIL, PLC, REC, TRV, PHS; 11426-003-OIL, TRV, PHS; 11426-004-OIL, TRV, PHS; 11426-005-OIL, SOC; 11426-006-OIL, SOC; 11426-007-OIL, VIS; 11426-008-OIL, WTR; 11426-009-OIL, WTR; 11426-010-OIL, REC, PLC, FWL; 11426-011-OIL, TRV; 11426-012-OIL, AIR, WTR, SOI; 11426-013-OIL, FWL; 11426-014-OIL, PLC
Uyehara	Carl		11428	11428-001-OIL, PLC, VIS, REC; 11428-002-OIL, TRV, TRN, PHS; 11428-003-OIL, PHS; 11428-004-OIL, WTR, AIR, SOI, SOC; 11428-005-OIL, TRV, TRN, SOC; 11428-006-OIL, FWL
Valdez	D?		11978	11978-001-PRC; 11978-002-OIL; 11978-003-SOC, OIL; 11978-004-SOC, ALT, OIL
Valencia	Karsyn		12076	12076-001-OIL, MIN, SOC
Valineir	Kostnic		1057	1057-001-OIL, PLC, PRC; 1057-002-OIL, PRC, SOC
Van Matre	Brady		11125	11125-001-REC; 11125-002-PRC, REC, TRV
Vanby?	Mark		1031	1031-001-OIL, SOC
Vance	Mickey		14060	14060-001-OIL, SOC
Vandehei	Mark		1507	1507-001-OIL, MIN, PRC, AIR
Vanloen	Traci		14033	14033-001-OIL, ALT
VanMeter	Gary		1916	1916-001-REC, TRN

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VARIOUS	VARIOUS		13003	13003-001-SOC; 13003-002-OIL, SOC; 13003-003-SOC; 13003-004-SOC; 13003-005-SOC; 13003-006-SOC, REC, OIL; 13003-007-REC, OIL, SOC; 13003-008-SOC; 13003-009-SOC, OIL
Vaughn	Darren		13138	13138-001-REC, TRN, SOC, PHS
Vawter	Russ		1632	1632-001-REC, TRN, ALT; 1632-002-PLC, REC, TRN, ALT; 1632-003-REC, TRN; 1632-004-ALT, REC, TRN
Vei	Shauna		11953	11953-001-OIL, SOC; 11953-002-OIL, AIR, SOC, PHS; 11953-003-OIL, SOC; 11953-004-OIL, SOC; 11953-005-OIL, SOC; 11953-006-OIL; 11953-006-OIL, SOC, PLC
Vei	Steve		11954	11954-001-OIL, SOC; 11954-002-OIL, AIR, SOC, PHS; 11954-003-OIL, SOC; 11954-004-OIL, SOC; 11954-005-OIL, SOC; 11954-006-OIL; 11954-006-OIL, SOC
Velasco	Miguel		11911	11911-001-OHS, PRC; 11911-002-PHS, PRC
Velasco	Salvador		12088	12088-001-OIL, MIN, SOC
Verner	Jason		14016	14016-001-OIL, SOC
Vieira	Linda		11417	11417-001-PLC, REC, FWL, SOC
Villa	Ruben		1909	1909-001-REC, TRN, PLC
Vincent	Brad		1218	1218-001-AIR, CON; 1218-002-AIR, ALT; 1218-003-RNW, AIR, PHS
Vink	Deborah	The Nature Conservancy	14003	14003-001-CON
Voell	David		11218	11218-001-PRC, TRV, REC
Voight	Preston		14021	14021-001-OIL, SOC
Vozick	Eric		11407	11407-001-REC, FWL; 11407-002-PLC, REC, TRV; 11407-003-FWL, REC, TRV; 11407-004-FWL, REC
W...?	J...?		12080	12080-001-OIL, MIN, PRC
Wade	Roger		11975	11975-001-REC, PLC; 11975-002-REC, PLC
Wainwright	Charles		1925	1925-001-REC, TRN, PLC
Walden	Carmel		31	031-001-REC, PRC, ALT; 031-002-MIN, OIL; 031-003-ALT, WSA, LWC
Walden	Carmel		1601	1601-001-REC, WSA; 1601-002-LWC, ALT; 1601-002-OIL
Waldron	Robert		1810	1810-001-REC, TRN, SOC; 1810-002-REC, TRN, PHS
Waligroski	Gregg		17000	17000-001-REC, TRN, FWL; 17000-002-PLC, TRN, REC, PHS
Waller	Marty		17006	17006-001-REC, TRN, SCO
Waltman	Ted		1905	1905-001-REC, ALT, PLC, TRN
Wanner	Ralph		11510	11510-001- OIL, FWL, VEG, WTR, AIR, ALT



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**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Warden	Stephen		11341	11341-001-REC, TRV, PLC; 11341-002-PLC, PHS, REC, TRV; 11341-003-ALT; 11341-004-TRV; 11341-005-PLC, REC, TRV; 11341-006-ALT; 11341-007-TRV
Warner	Stephanie		11463	11463-001-OIL, PLC, ALT, REC, FWL
Warner	Kevin		11508	11508-001-PLC, ALT, OIL, AIR, WTR
Warnke	Carl		11367	11367-001-PLC, TRV, REC
Warren	Michael		1417	1417-001-OIL, MIN, ALT, SOC
Warren	Adam		11245	11245-001-OIL, MIN, SOC; 11245-002-SOC, PRC
Warren	Michael	Energy Liason	13223	13223-001-FWL, VEG, SOC, ALT; 13223-002- REC, SOC, ALT, FWL; 13223-003- OIL, PLC, SOC, ALT, FWL; 13223-004- OIL, PLC, FWL, WTR, ALT, SOC; 13223-005-PRC, CON, ALT, FWL; 13223-006-PRC, FWL, OIL, SSS, SOC, ALT; 13223-007-FWL, ALT, REC, CUM, PRC, SOC, OIL; 13223-008- CUM, PRC, SOC, OIL; 13223-009- CUM, PRC, SOC, OIL, FWL; 13223-010- CUM, PRC, SOC, OIL; 13223-011- OIL, CUM, PRC, SOC; 13223-012- FWL, ALT; 13223-013- WTR, FWL, ALT. PRC, SOC, OIL; 13223-014- WTR, PLC, FWL, ALT. PRC, SOC; 13223-015- PLC, FWL; 13223-016-PLC, FWL, CON; 13223-017-FWL, ACC; 13223-018-FWL, PRC; 13223-019- CON, PRC, TRV; 13223-020-CON, PRC, FWL, VEG, SSS; 13223-021- CON, PLC, ACC, FWL, ALT; 13223-022-ALT, PLC, ACC, REC, OIL, VEG; 13223-023-ALT, PLC, ACC, PRC, SOC; 13223-024-ALT, PLC, ACC, VEG; 13223-025-ALT, ACC, PLC, VEG; 13223-026-ALT, VEG, SSS, ACC; 13223-027-ALT, OIL, VEG; 13223-028-ALT, VEG, PLC, ACC; 13223-029- ALT, PLC, VEG, SSS, REC; 13223-030-PRC, ALT, OIL, CON PLC; 13223-031-FWL, PRC, ALT, VEG; 13223-032-WSR; 13223-033-FWL, SSS; 13223-034- FWL, SSS; 13223-035-ALT; 13223-036-GRZ, PRC; 13223-037-PRC; 13223-038-PRC, FWL; 13223-039- OIL, PRC; 13223-040-REC, FWL, TRV; 13223-041-FWL; 13223-042- FWL, PRC; 13223-043-FWL, ALT, PLC; 13223-044-FWL, OIL;

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

Last Name First Name		Organization	Letter ID Code	Comment ID Codes
continued			13223	13223-045-SOI; 13223-046-SOI; 13223-047-SOI; 13223-048-WTR; 13223-049-WTR; 13223-050-WTR; 13223-051-VEG; 13223-052-VEG; 13223-053-VEG; 13223-054-VEG; 13223-055-VEG, SSS; 13223-056-FWL; 13223-057-FWL; 13223-058-FWL; 13223-059-FWL; 13223-060-FWL; 13223-061-FWL, OIL, MIN; 13223-062-FWL, WTR; 13223-063-FWL; 13223-064-FWL; 13223-065-FWL; 13223-066-FWL; 13223-067-FWL; 13223-068-FWL, SSS; 13223-069-FWL; 13223-070-FWL, OIL, MIN; 13223-071-FWL; 13223-072-SSS; 13223-073-SSS; 13223-074-SSS; 13223-075-SSS; 13223-076-SSS, OIL, MIN; 13223-077-SSS; 13223-078-SSS; 13223-079-SSS; 13223-080-SSS; 13223-081-SSS; 13223-082-SSS; 13223-083-SSS; 13223-084-LWC, OIL; 13223-085-GRZ; 13223-086-REC; 13223-087-REC; 13223-089-REC, FWL; 13223-090-REC, FWL; 13223-091-RLT; 13223-092-RLT, FWL; 13223-093-RLT, MIN; 13223-094-MIN, PRC, CON; 13223-095-MIN; 13223-096-OIL, MIN, FWL, SSS; 13223-097-MIN, OIL, WTR, FWL, SSS, ACC, LWCS, WSR; 13223-098-OIL, FWL; 13223-099-OIL; 13223-100-OIL; 13223-101-MIN; 13223-102-ACC; 13223-103-ACC; 13223-104-ACC, TRV; 13223-105-WSA, OIL; 13223-106-WTR; 13223-107-WTR; 13223-108-WTR; 13223-109-WTR; 13223-110-WTR; 13223-111-WTR; 13223-112-WTR; 13223-113-WTR; 13223-114-WTR; 13223-115-WTR; 13223-116-WTR; 13223-117-VEG; 13223-118-FWL; 13223-119-FWL; 13223-120-FWL; 13223-121-FWL; 13223-122-FWL; 13223-123-FWL; 13223-124-FWL; 13223-125-FWL; 13223-126-FWL; 13223-127-FWL; 13223-128-FWL; 13223-129-SSS; 13223-130-SSS; 13223-131-SSS; 13223-132-SSS; 13223-133-SSS; 13223-134-SSS; 13223-135-SSS; 13223-136-SSS; 13223-137-SSS; 13223-138-SSS; 13223-139-SSS; 13223-140-SSS; 13223-141-SSS; 13223-142-SSS; 13223-143-SSS; 13223-144-REC;

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
continued			13223	13223-145-RLT, FWL; 13223-146-MIN, PRC, FWL; 13223-147-OIL, PRC, CON; 13223-148-PHS; 13223-149-CUM; 13223-150-FWL; 13223-151-FWL; 13223-152-FWL, REC; 13223-153-FWL; 13223-154-FWL; 13223-155-FWL; 13223-156-FWL; 13223-157-FWL; 13223-158-FWL; 13223-159-FWL; 13223-160-FWL; 13223-161-FWL; 13223-162-FWL, REC; 13223-163-FWL; 13223-164-FWL, OIL; 13223-165-FWL, OIL; 13223-166-REC; 13223-167-RLT; 13223-168, RLT, OIL; 13223-169, RLT, OIL, FWL, SSS, ACC, LWC, WSR; 13223-170-FWL; 13223-171-FWL; 13223-172-FWL; 13223-173-TRV; 13223-174-TRV; 13223-175-TRV; 13223-176-TRV; 13223-177-FWL, TRV; 13223-178-FWL, OIL; 13223-179-WTR; 13223-180-FWL; 13223-181-FWL; 13223-182-FWL; 13223-183-FWL; 13223-184-FWL, OIL, MIN; 13223-185-FWL; 13223-186-FWL; 13223-187-FWL; 13223-188-FWL; 13223-188-VEG; 13223-189-FWL; 13223-190-PRC; 13223-191-OIL, FWL, PRC
Wasli	Kevin		11522	11522-001-ALT, PLC; 11522-002-REC, TRV, ALT; 11522-003- ALT, REC, TRV, PRC
Watkins	Deborah		11342	11342-001-ALT, REC, TRV; 11342-002-REC, TRV, VIS; 11342-003-PLC, TRV, REC; 11342-004-REC, TRV, PRC
Watson	Stephen		15008	15008-001-ALT, TRV
Watt	Andy		12045	12045-001-OIL, MIN, PRC; 12045-002-ALT; 12045-003-OIL, MIN, SOC; 12045-004-OIL, MIN
Webster	Donavon		11944	11944-001-OIL, SOC
Wells	Patrick	Aurora Water and Colorado Springs Utilities	11613	11613-001-PRC, CON; 11613-002-PRC, CON; 11613-003-WSR, WTR; 11613-004-ALT, WTR; 11613-005-WSR; 11613-006-WSR, REC; 11613-007-WSR; 11613-008-WTR, WSR; 11613-009-WSR, WTR
Whaley	Wes		14013	14013-001-OIL, SOC

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
White	Jason	Carbondale Environmental Board, Thompson Divide Coalition	7	007-001-OIL, REC, SOC; 007-002-ACC, LWC; 007-003-SOC, LWC, OIL, PLC; 007-004-WTR, OIL; 007-005, ALT, LWC, REC, SOC, FWL, OIL, ACC; 007-006-OIL, REC, RLT, SOC, PRC; 007-007-PRC; 007-008-RNW; 007-009-PRC, MIN, ALT
White	Richard		1087	1087-001-OIL, PRC; 1087-002-ALT, OIL, PRC
White	Joseph R.		1219	1219-001-AIR, OIL, CON; 1219-002-CON, PRC; 1219-003-AIR, PRC
White	Paul		14020	14020-001-OIL, SOC
Whiteman	Eric		11433	11433-001-REC, TRN; 11433-002-REC, TRN; 11433-003-REC; 11433-004-REC
Whiting	Mely	Trout Unlimited	11662	11662-001-ALT, WSR, CON; 11662-002-PLC, WSR, ALT, WTR; 11662-003-PLC, WSR, ALT, WTR, SSS; 11662-004-PLC, WSR, ALT, WTR
Whitman	Eric		14006	14006-001-OIL, SOC
Whitsitt	Jaque	Midvalley Trails Committee of Eagle County	15013	15013-001-ALT, TRV, REC, PRC, CON, PLC
Wilkie	Robert		12007	12007-001-SOC, TRN; 12007-002-OIL, MIN, RNW; 12007-003-SOC
Wilkinson	Barry		1058	1058-001-OIL, PLC, PRC; 1058-002-OIL, PRC, SOC
Williams	Monte		1231	1231-001-PRC; 1231-002-OIL, FWL; 1231-003-RLT; 1231-004-ALT
Williams	Jan		1321	1321-001-PRC, OIL, MIN, SOC
Williams	Megan		11424	11424-001-AIR, CUM; 11424-002-AIR, SOC, PRC; 11424-003-AIR, PRC, PHS; 11424-004-AIR, ALT, SOC, PRC; 11424-005-AIR, SOC, PRC; 11424-006-AIR, ALT, SOC, PRC; 11424-007-AIR, PRC, SOC, ALT, PHS, VEG, PLC; 11424-008-AIR, OIL, TRV; 11424-009-ALT, AIR, OIL; 11424-010-AIR, OIL, VIS, PLC; 11424-011-AIR, OIL, ALT, PRC; 11424-012-AIR, ALT, PRC; 11424-013-AIR, ALT, PRC; 11424-014-AIR, VIS, PRC, PLC; 11424-015-AIR, PRC, ALT; 11424-016-AIR, PRC, OIL; 11424-017-AIR, PRC, ALT, TRV; 11424-018-AIR, PRC, OIL, ALT, PLC, CUM; 11424-019-AIR, PLC, PRC; 11424-020-AIR, PHS, PRC; 11424-021-AIR, PRC, OIL; 11424-022-AIR, OIL, PRC, ALT
Williams	Jessie		15012	15012-001-OIL, SOC
Wilson	Brad		1434	1434-001-PRC; 1434-002-OIL, MIN, FWL, PRC
Wilson	Scott		11948	11948-001-OIL, ALT, AIR, SCO

**Table V-3**  
**List of Commenters and Organizations on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Letter ID Code</b>	<b>Comment ID Codes</b>
Winegard	Becky		11240	11240-001-PRC, OIL, MIN; 11240-002-OIL, MIN, SOC, PRC; 11240-003-ALT, SOC, OIL, MIN, PRC; 11240-004-OIL, MIN, PRC; 11240-005-PRC, SOC, SOC, OIL, MIN
Wodlinger	Kevin		13322	13322-001-OIL, MIN, PRC, SOC
Wolf	Byron		11210	11210-001-PRC, TRV, REC; 11210-002-PRC; 11210-003-ALT, PRC; 11210-004-PRC, TRV, REC
Wolff	Don		1201	1201-001-AIR, OIL, CON; 1201-002-AIR, RNW
Woolman	Jim		1425	1425-001-OIL, MIN; 1425-002-PRC, SSS, MIN; 1425-003-OIL, MIN
Woolman	Karen		1428	1428-001-OIL, MIN, PRC
Worthy	Crista and Fred		11432	11432-001-PLC, PRC, REC, TRN; 11432-002-REC, TRN, PHS; 11432-003-REC, TRN, PHS, WSA; 11432-004-REC, PHS, TRN
Wray	Brian		11214	11214-001-TRV, REC, PRC
Wright	Jeff		34	034-001-ALT; 034-002-REC, TRV; 034-003-AIR, PLC, PHS
Wyley	Scott		1036	1036-001-AIR, CON, SOC, PRC; 1036-002-OIL, PRC
Yorgesen	Dennis		11928	11928-001-OIL, SOC; 11928-002-OIL

**Table V-4**  
**List of Anonymous or Illegible Commenters on the Draft RMP/Draft EIS**

<b>Last Name</b>	<b>First Name</b>	<b>Organization</b>	<b>Comment ID Code</b>	<b>Comment ID Code</b>
Anonymous			11509	11509-001-PRC; 11509-002-ALT, OIL, AIR, WTR; 11509-003-PLC, REC, FWL, VEG, CON, PRC, SOC; 11509-004-ALT, SOC; 11509-005-ALT, SOC, CON, OIL, TRV, REC; 11509-006-PLC, REC, TRV, PHS, ALT, SOC, WTR; 11509-007-REC, ALT, CON, FWL, PHS, SOC; 11509-008- PLC, TRV, REC, ALT, CON, FWL, VEG, SOC, PRC; 11509-009-REC, PLC, ALT; 11509-010-REC, PLC, ALT, CON, PHS, TRV; 11509-011-REC, RLT, ALT, PHS, TRV; 11509-012-REC, RLT, ALT, PHS, TRV; 11509-013-REC, ALT, FWL, VEG, TRV; 11509-014-REC, ALT, TRV, RLT; 11509-014-REC, ALT, TRV, RLT; 11509-015-SOC, ALT, PRC; 11509-016-SOC, ALT, PRC; 11509-017-SOC, ALT, PRC, VEG; 11509-018-REC, ALT, FWL, PRC; 11509-019-LWC, SOC, ALT, PRC, PLC, FWL, VEG, OIL, TRV, WSA; 11509-019-SOC, ALT, PRC, CUM, FWL, VEG; 11509-020-PLC, ALT, WSR, REC; 11509-021-OIL, PLC, ALT, SOC, PRC, REC, WTR, PHS, FWL; 11509-022-OIL, REC, FWL, ALT, SOC, PRC, REC, WTR, PHS, FWL; 11509-023-GRZ, FWL, VEG, SOC, PRC
P?	illegible		1101	1101-001-RLT, 1101-002-ALT, OIL
illegible			1104	1104-001-ALT, OIL
Ault	J?		1107	1107-001-ALT, PHS
H?	Dustin		1108	1108-001-OIL, 1108-002-SOC
illegible			1127	1127-001-AIR, 1127-002-OIL, AIR
illegible			1129	1129-001-OIL, SOC
illegible			1131	1131-001-OIL
Jim?	Breel?		1133	1133-001-SOC, 1133-002-RLT; 1133-003-RLT
P?	V?		1137	1137-001-AIR
W?	Greg		1140	1140-001-SOC, 1140-002-SOC, 1140-003-SOC
illegible	illegible		1202	1202-001-FWL, ALT, 1202-002-FWL
illegible	illegible		1203	1203-001-ALT, OIL, 1203-002-SOC, 1203-003-OIL, 1203-004-SOC, OIL,
illegible	illegible		1208	1208-001-PHS, RNW, 1208-002-AIR, 1208-003-PHS, CON; 1208-004-AIR
illegible	illegible		1229	1229-001-SOC, OIL, PRC, 1229-002-SOC, OIL, ALT
illegible	illegible		1239	1239-001-ALT, OIL, SOC, 1239-002-ALT, 1239-003-CON, SOC, ALT

**Table V-4**  
**List of Anonymous or Illegible Commenters on the Draft RMP/Draft EIS**

		Organization	Comment ID	Comment ID Code
Last Name	First Name		Code	
illegible	Richard		1240	1240-001-OIL, ALT, SOC, 1240-002-OIL, ALT, SOC, PRC, 1240-003-SOC, CUM, PRC, SOC
illegible	illegible		1246	1246-001-OIL, ALT, WTR, 1246-002-OIL, SOC, ALT
illegible			1300	1300-001-AIR, PRC; 1300-002-OIL
W?	S?		1402	1402-001-OIL, SOC, AIR
A?	F?		1415	1415-001-OIL, FWL, SOC
Illegible			1423	1423-001-AIR; 1423-002-OIL, SOC
Illegible	illegible		12006	12006-001-AIR, PRC, CON
Illegible	Robert		12033	12033-001-ALT, OIL, MIN, SOC
Illegible	Zachary		12038	12038-001-OIL, MIN, PRC; 12038-002-AIR, OIL, MIN, PRC; 12038-003-AIR
Illegible	illegible		12043	12043-001-ALT, OIL, MIN, SOC; 12043-002-ALT, LWC, PRC, SOC, OIL, MIN; 12043-003-ALT, OIL, MIN
Illegible	illegible		12044	12044-001-OIL, MIN, PRC, PHS
Illegible	C		12047	12047-001-ALT, OIL, MIN, SOC
Illegible	illegible		12063	12063-001-OIL, MIN, ALT; 12063-002-WTR, ALT; 12063-003-SSS, ALT, ACC; 12063-004-ALT, WSA, LWC, PRC; 12063-005-ALT, OIL, MIN, SOC
Illegible	John		12078	12078-001-AIR, PRC, CON, OIL, MIN
Illegible	?		12081	12081-001-PRC, SOC, OIL, MIN; 12081-002-AIR, PRC, CON
Illegible	illegible		12083	12083-001-ALT, PRC, AIR, CON, OIL, MIN; 12083-002-ALT, LWC, PRC, WSA; 12083-003-PRC
Illegible	illegible		13407	13407-001-OIL, SOC, PRC
Illegible	illegible		13408	13408-001-OIL, ALT, PRC; 13408-002-AIR, OIL, SOC; 13408-003-WTR, OIL, MIN, ALT; 13408-004-CON, PRC
Illegible			14046	14046-001-MIN, OIL, PRC
Illegible			14051	14051-001-OIL, SOC
Illegible	Mark		14052	14052-001-OIL, SOC, ALT
Illegible			14054	14054-001-AIR, OIL, SOC, PRC
Illegible			14055	14055-001-OIL, ALT, SOC
Illegible			14058	14058-001-AIR, OIL, PRC, SOC
Illegible			14059	14059-001-AIR, OIL, PRC, SOC
Illegible			14062	14062-001-SOC, OIL, MIN
Illegible			14063	14063-001-OIL, FWL, SOC
Illegible			14064	14064-001-OIL, SOC
Illegible	Jason		15010	15010-001-AIR, ALT, PRC
Illegible	Jesse		15017	15017-001-OIL, PRC, AIR
Illegible			15018	15018-001-OIL, MIN, PRC, SOC
Illegible	illegible		16005	16005-001-SOC, OIL; 16005-002-REC, OIL, SOC

# APPENDIX V

## PART 3: CAMPAIGN LETTERS

### CAMPAIGN LETTERS SUBMITTED FOR THE DRAFT RMP/DRAFT EIS

Several organizations held campaigns regarding the alternatives evaluated and the issues discussed in the Draft RMP/Draft EIS through which their constituents were able to submit standardized letters. These organizations submitted most of these letters in bulk to the BLM, while some were submitted directly to the BLM by the individual. Ten campaigns were submitted on the Draft RMP/Draft EIS, with more than 26,300 constituents represented. Table V-5 lists the separate organizations whose members submitted campaign letters on the Draft RMP/Draft EIS along with the identified comments. The individual names of all those who submitted campaign letters are available in the administrative record.

**Table V-5**  
**Organizations Whose Members**  
**Submitted Campaign Letters on the Draft RMP/Draft EIS**

<b>Organization</b>	<b>Number of Participants in Campaign</b>	<b>Comment Response Categories</b>
Natural Resources Defense Council (11700)	17,424	OIL, MIN, FWL, REC, WTR, AIR, ACC, VEG, SSS, WSR, PHS, PRC
Environmental Defense Fund	8,323	OIL, LWC, ACC, FWL, WSR, PHS, PRC
Roaring Fork Mountain Biking Association (11247)	11	TRV, REC, PHS, WEG, FWL, AIR, GRZ, RLT
Thompson Divide Coalition (11409)	249	FWL, OIL, WTR, AIR, REC, GRZ, SOC, TRV, VEG
Save Thompson Divide (11806)	130	FWL, OIL, WTR, AIR, REC, GRZ, SOC, VEG
Recreational Aviation Foundation (1640)	123	REC, TRN, CON, SOC, REC, TRV
Aviation Support Group (1706)	27	REC, TRN
Winter Closures Group (11003)	3	TRV, SOC
Oil and Gas Support Group 1 (11938)	8	OIL, SOC
Oil and Gas Support Group 2 (14005)	29	OIL, SOC

Some campaign letters were submitted as a single form letter, with multiple signatures attached, indicating support for the campaign. Some individuals modified a standard letter provided by the organization to reflect or emphasize various concerns. These modifications were reviewed and any additional comments identified



were logged, categorized, evaluated, and considered in the preparation of the Proposed RMP/Final EIS as non-campaign individual comment.

### **NATURAL RESOURCES DEFENSE COUNCIL CAMPAIGN LETTER**

I am writing to oppose your current preferred alternative for the Colorado River Valley, which would lead to irresponsible oil and gas development.

The Colorado River Valley is home to vital wildlife habitat for elk, sage grouse, Canada lynx, bighorn sheep, and genetically-pure Colorado River cutthroat trout. It is an enormously popular area for outdoor recreation year-round, and it is also adjacent to many communities with growing populations that depend on these lands for clean water and clean air. This land is supposed to be managed for all these multiple uses, but your current plan would make dirty oil and gas development the top priority.

You should protect all lands with wilderness characteristics and Areas of Critical Environmental Concern from oil and gas leasing. These lands must be preserved for important wildlife and plant species and rare geological formations. In addition, all rivers suitable for inclusion in the WSR System should be designated as such to ensure their protection.

I urge you to complete a full health impact assessment before approving any new leasing, to understand the risks to human health and the options to mitigate such impacts, as requested by local governments. The National Environmental Policy Act requires federal agencies to consider "the degree to which the proposed action affects public health or safety."

I am also concerned that you are planning to move ahead with new oil and gas development without fully assessing the weakness of current regulations. I urge you to reject your current preferred alternative and go back to the drawing board. Please create a management plan that does more to protect the communities and wildlands of this region.

### **ENVIRONMENTAL DEFENSE FUND CAMPAIGN LETTER**

I am writing to oppose your current preferred alternative for the Colorado River Valley, which would lead to irresponsible oil and gas development. The Colorado River Valley is home to vital wildlife habitat for elk, sage grouse, Canada lynx, bighorn sheep, and genetically-pure Colorado River cutthroat trout. It is an enormously popular area for outdoor recreation year-round, and it is also adjacent to many communities with growing populations that depend on these lands for clean water and clean air. This land is supposed to be managed for all these multiple uses, but your current plan would make dirty oil and gas development the top priority. You should protect all lands with wilderness characteristics and Areas of Critical Environmental Concern from oil and gas leasing. These lands must be preserved for important wildlife and plant species and rare geological formations. In addition, all rivers suitable for inclusion in the WSR System should be designated as such to ensure their protection. I urge you to complete a full health impact assessment before approving any new leasing, to understand the risks to human health and the options to mitigate such impacts, as requested by local governments.

The National Environmental Policy Act requires federal agencies to consider "the degree to which the proposed action affects public health or safety." I am also concerned that you are planning to move ahead with new oil and gas development without fully assessing the weakness of current regulations. I urge you to reject your current preferred alternative and go back to the drawing board. Please create a management plan that does more to protect the communities and wildlands of this region.

## **ROARING FORK MOUNTAIN BIKE ASSOCIATION**

### **Comments regarding the BLM's Colorado River Valley Draft Resource Management Plan and Environmental Impact Statement**

On the following pages, please find detailed comments for the BLM Zones that are within our regional area of concern, along with attached zone maps that provide route suggestions & proposals.

#### **ZONE I / (PRINCE CREEK)**

##### Significant issues:

- Currently, there is true potential for collisions between user groups. Motorcycles ascend quickly; mountain bikes descend quickly. Combined with the dense scrub oak vegetation surrounding the trails in this zone, serious injuries may result.
- Habitat protection can be improved through seasonal trail closures.
- Transient camping, largely unregulated, is a burden on the lands along Prince Creek Rd. Camp sites should be removed along the road to reduce this problem.
- Management of the land for multiple uses.

##### Access:

- Better access needs to be provided near the Rock Bottom Ranch, via the Rio Grande bike path. This will help keep trails close to population centers, cutting down on driving to trailheads to result in an overall reduced carbon footprint for the local community.
- Plan routes that will provide access to trails in Hay Park (WRNF) and Light Hill (Zone J).

##### Alternative Choice:

From a multiple use standpoint, the available alternatives do not meet the needs of the different user groups. Our preference is for Alternative B, which would designate this zone as an SMRA. However, RFMBA has informally met with CBTRA, and in brief, our two organizations agree that motorcycles are appropriate on some existing single track, while we further agree that other trails should be mechanized only, as they present safety and trail sustainability issues if motorcycle use were to continue. The proposed trails to be shared are "N. Porcupine", "Lower Outtie", and "Upper Buckhorn". The trails that they agree do not work well for motorcycles are "Skull Bucket", "Innie", & "Outtie". There was also a concern that motorcycles should be routed away from trails close to the BLM access provided via Rock Bottom Ranch's easement, in order to prevent a motorcycle from accessing the Rio Grande paved bike path. Thus, "Buckhorn Traverse" should also remain non-motorized. These trails are identified accordingly on the attached map. We suggest that Alternative B be revised to conform with the above route designations.

Specific Comments (each comment number is referenced on the attached map):

- 1) Trail 23913, “Father of Ginormous” should be a downhill travel only trail due to the blind corners and fast decent. The top 1/3 of this trail leading to the top of the Crown needs to be reworked due to overgrowth. As mountain biking should appeal to all level of riders, consideration should be given to include additional features (roll over jumps & crossovers) which will heighten the enthusiasm of the younger generation of riders, and allow intermediate riders the ability to advance their riding skill set.
- 2) Create a more sustainable access route to The Crown; current access uses an easement through private property (ACES - Rock Bottom Ranch) that is a steep old 4wd route which is not sustainable.
- 3) Reroute the “Creekside” trail so that it avoids adjacent private property.
- 4) As proposed in the citizen’s group discussions, have a connector trail from “Innie” to the “Father of Ginormous” to keep bikes off of roads that can present conflicts with motorized users.
- 5) As there are no single track trails on the El Jebel side of the crown, consideration needs to be given for a trail that starts at the top of the Crown and connects to the southeastern side of the “Buckhorn Traverse” trail. This gives El Jebel & Basalt residents the opportunity to easily access single track without having to drive to a trailhead.
- 6) One of the highest priorities for the Roaring Fork Mountain Biking Association has been to identify how one riding zone can interconnect to the next. This is important as it allows for riders to journey beyond a small area enhancing the amount of time a person can spend on a bike and their riding experience. As Prince Creek is the natural stepping stone to the Hay Park area on the adjacent WRNF, it makes sense to have a route system interconnecting the two as proposed on the attached map.
- 7) Safety issues are of a major concern descending the road from Hay Park. It’s a heavily traveled narrow road which can result in a tragic consequence between vehicles and bikes. This can be easily mitigated by adding a trail descending on BLM land from the Thomas Lake trailhead parking lot.

## **ZONE H / (NORTH THOMPSON CREEK)**

Significant issues:

- Alleviate trailhead overcrowding and overuse of other popular nearby BLM areas. The nearby Red Hill SRMA documents 55,000 annual user visits. As the valley experiences additional growth and the popularity of recreational opportunities continue to increase, local trails will continue to see more use. North Thompson can alleviate this pressure.
- To provide cohesive relations between recreational users and ranchers, potential new trail layouts should work to limit the proximity of trails to private ranch land located on the valley floor adjacent to the Town of Carbondale. See comments below under “Trail improvement or additions”.
- Suggest improving habitat protection through seasonal trail closures.

Access:

- The existing north side access provides close to home opportunities which helps reduce our carbon footprint.
- Consideration should be given as outlined below on allowing for interconnectivity to the Thompson Creek area.

Alternative choice:

- We support the Preferred Alternative, B, as it is the best choice for multiple uses, while also limiting resource extraction. If Alternative C is chosen, revisions should be made to allow current mountain bike use to continue.

Specific Comments (each comment number is referenced on the attached map):

1) Although Red Hill experiences 55,000 users at the trailhead, only a small number (less than 300) journey to the northern most trails. The same can hold true for N Thompson. Although there will be a lot of users at the trailhead because of the time and efforts required, very few users will venture to the far southern flanks of this zone. Thus, a distant loop on the south side of the Lorax will cause little disruption to cattle, or as a noted rancher concern, chasing wildlife from BLM lands to the Carbondale valley floor ranching lands. Seasonal closures could also be used to address this concern.

2) Having connectivity with other riding zones is a high priority of the Roaring Fork Mountain Biking Association. As N. Thompson allows for easy access to the Thompson Creek trails, a loop on the western flank of this area meets this objective. This also meets the desires of the local ranchers by keeping trails away from the private ranching land in the Carbondale valley floor.

**ZONE G / (RED HILL & FISCHER CREEK)**

Significant issues:

- Overuse of trails.
- Habitat protection through seasonal closures.

Access:

- If the Sutey Ranch/Two Shoes land exchange materializes, access should be provided from the north side of Red Hill to alleviate overuse pressure on the Carbondale side.
- Trail access from Spring Valley/CMC to Fischer Creek will foster outdoor recreation opportunities for those students at the CMC campus and neighboring residential communities.
- Provide a new access route from valley floor at El Jebel to access WRNF land on Basalt Mountain.

Alternative choice:

- We support the Preferred Alternative, B. If Alternative C is chosen, revisions should be made to allow current mountain bike use in the Fischer Creek area to continue.

Specific Comments (each comment number is referenced on the attached map):

1) As noted above, a trail accessing Spring Valley/CMC will provide easy opportunities for the local college community to access trails. Many of these students have little to no means, so driving to trails can be limited opportunity, or simply out of the question. Access from this point will allow a perfect back door access trail for the college residents and the neighboring residential areas. Additionally, this will provide a potential loop to Red Hill as outlined in #2 below.

2) Although the hillside is steep, there is potential to create a sustainable trail accessing Red Hill from lower Cattle Creek. This would provide a solution that alleviates the pressure of the significant number of users accessing this SRMA from the Carbondale trailhead, all while providing easier access for the Ironbridge neighborhood and the Glenwood area.

3) If access is gained through a lower El Jebel subdivision as currently being pursued through Mid Valley Trails, the BLM lands on the Western Flank of Basalt Mountain would provide access to the existing Basalt Mountain (WRNF) trail system.

## **ZONE F / (GREATER GLENWOOD AREA)**

Significant issues:

- This is the most populated area of all zones, yet there are the fewest trails in all of the zones located within this BLM jurisdiction.

Access:

- Easy access is available from many areas.

Alternative choice:

- As Alternatives B & C would effectively close many of the 4 wheel drive roads that currently exist in this zone, we suggest that many of these routes be revised in Preferred Alternative B to remain open to Mechanized (mountain bike) use.

Specific Comment (each comment number is referenced on the attached map):

1) As Glenwood is the most populated area in the valley and also heavily relies on tourist revenue, additional trails are needed to support this zone. Accessing the flat tops from Glenwood would provide a classic trail opportunity to reach high alpine zones with large vertical climbs/descents. If the trail head was placed at the South Canyon exit of I-70, there could also be a trail system that heads south from the Interstate.

## **ZONE J / (BASALT)**

Significant issues:

- Interconnectivity between other zones as described below.
- Habitat protection through seasonal closures, to be considered at only the most sensitive locations.

Access:

- Close to Basalt.

Alternative choice:

- We support the Preferred Alternative, B.

Specific Comment (each comment number is referenced on the attached map):

1) To provide Basalt residents an alternate access to the Hay Park trail system (on WRNF land), a new route connection from the north side of Light Hill makes sense. The main existing route on the ridge of Light Hill should be rerouted to provide a more sustainable trail and a more enjoyable riding experience for local residents.

We look forward to working with BLM staff to achieve approvals for the route system improvements proposed within the above comments. Alternative B, with some key revisions, can be a truly successful “Preferred Alternative” that will provide a strong framework for managing these lands over the next twenty five years or, We look forward to continuing our partnership with the BLM, to fulfill our mission of creating the best possible system of trails for mountain bike use throughout the Roaring Fork Valley.

## **THOMPSON DIVIDE COALITION**

I write to offer comments on the Draft RMP & Draft EIS for the BLM Colorado River Valley Field Office, Colorado. The decisions made for the final RMP/EIS will steer the protection and development of a large portion of Western Colorado for years to come. While the BLM can directly manage human issues such as travel, recreation, ownership, urban interface, cultural resources, and energy development, the natural resources of wildlife, water, air, habitat and vegetation do not operate in the isolation of political boundaries and rely on the health of entire ecosystems for their sustainability and therefore cannot be managed in isolation. I ask the BLM to consider my comments as related to the Thompson Divide Area, which contains BLM, Forest Service, State, and private lands because it represents whole habitats and ecosystems of which the BLM lands are an integral part, and especially concerning the BLM management of mineral leases under all Federal lands.

### **Key Components of Alternative C:**

#### **Water Quality:**

The rivers and streams of the Thompson Divide area are some of the highest quality in the state as determined by the Thompson Divide Baseline Water Quality Study from 2009 to 2011, which was designed

and conducted by the Roaring Fork Conservancy in Thompson Creek and the 4 Mile Creek Watershed. The conclusion of this 4-season sampling was that the waters were of very high quality and supported a healthy community of microorganisms. The endangered Colorado River Cutthroat Trout is present in several branches of Thompson Creek. Visit [www.savethompsondivide.org](http://www.savethompsondivide.org) for the Thompson Divide Executive Summary of the water quality report.

**Air Quality:**

The current air quality of the Thompson Divide area is clean as there are minimal roads and partial year use. Oil and gas development would threaten the air quality from the release of contaminants associated with drilling, traffic and year round use.

**Recreational Demand and Uses:**

The Thompson Divide area contains important natural values, it is a key economic driver in the 5-county region which it covers. The region is a popular recreation destination, hosting recreational activities including hunting, fishing, horseback riding, hiking, biking, backcountry skiing, snowmobiling, wildlife viewing, ice climbing and sport climbing. The Thompson Divide area contains Game Management Units #42 and #43, which together drew 14,000 big game licenses in 2010, according to the Colorado Division of Wildlife. The total direct economic input from hunting and fishing in the 5-county region is \$113,200,000, with the indirect impact being \$314,500,000, also according to the Colorado Division of Wildlife. These numbers demonstrate the critical role that undeveloped landscapes like the Thompson Divide play in contributing to local and state economies. In addition to the recreational inputs afforded by hunting and fishing, ranching in the Thompson Divide area also provides an important economic input; this landscape has supported summer cattle feeding of multiple generations of ranchers. Over 90% of the Thompson Divide area is currently leased for grazing.

**Energy Development:**

Energy development in this region would severely threaten the watersheds, natural values and economics inputs that the region benefits from. The Bureau of Land Management should withdraw the Thompson Divide area from availability for oil and gas development. Further, to the extent that there are existing leases in the area, BLM should take this opportunity to revisit those leases to ensure that they were issues in compliance with existing laws and regulations. Approximately 1/2 of the area was designated by the 2001 Roadless Rule and Colorado Roadless Rule for protection from further road building.

**Fish and Wildlife:**

The Thompson Divide Coalition is aiming to protect 221,000 acres that spans both BLM and Forest Service lands. The area comprises primarily mid-elevation habitat that is the headwaters for 15 watersheds, representing the key migration routes between connecting the Ragged Wilderness Area, the Flat Tops Wilderness Area and the Grand Mesa. It is important to wildlife for calving and fawning grounds, summer range, and winter habitat. The Thompson Divide is home to important populations of elk, bear, mountain lion, bighorn sheep, lynx, wild turkeys, boreal owls and cutthroat trout. It contains one of the largest aspen groves in the nation as well as old-growth spruce and pine forests, and is a biologically rich area that has been left largely in its natural state. Visit [savethompsondivide.org](http://savethompsondivide.org) for the Division of Wildlife letter of support.

Oil and gas development is incompatible with current uses, preservation of wildlife and wildlife habitat, clean air and water, recreational uses, grazing and other economic values. The BLM should support Alternative C as it pertains to the Thompson Divide area.

### **SAVE THOMPSON DIVIDE**

I ask that you deny SG Interests recent proposal to unitize 32,000 acres in the Thompson Creek area. The area is inappropriate for long-term natural gas development.

Thompson Creek helps sustain local communities with clean water, clean air, undisturbed expanses for wildlife and game, opportunities for recreation, and lands important for livestock operators who rely on federal grazing permits. Much of the area is inventoried roadless and retains values of national significance.

Approving an exploratory unit of this size in an area with so many incompatible values and uses is neither necessary nor advisable in the public interest. The public interest would be better served by letting these leases expire or making the operator prove them up individually.

The BLM must consider the abundant natural resources in the area that would be impacted by oil and gas development. On balance, this proposal will not properly conserve those natural resources. In fact, natural gas development in this area is likely to significantly degrade the natural resources that make Thompson Divide so unique.

Should the agency proceed with consideration of this unit proposal, it is necessary that a full environmental impact statement be prepared to assess and disclose potential impacts to the public.

### **RECREATIONAL AVIATION FOUNDATION**

The Recreation Aviation Foundation (RAF) is a national organization with members in all fifty states. The RAF's mission is "Keeping the legacy of recreational aviation strong by preserving, maintain and creating public use recreational and backcountry airstrips nationwide". The RAF applauds the BLM for its efforts to develop a Resource Management Plan (RMP) for the Colorado River Valley planning area. However, after a careful review of the draft RMP, the RAF can find no provision for the continued operation and management of the recreational airstrips located within the planning area. Therefore, the RAF finds that it would be appropriate to include language in the final RMP that addresses this issue in a positive manner.

The RAF can find no evidence in the draft RMP that aviation organizations or individuals within the aviation community were contacted at any time during the planning process, despite the fact that there are airstrips on BLM administered lands within the planning area. This omission includes the Colorado Division of Aeronautics and the Colorado Pilots Association. Therefore, the RAF would like to correct this omission by providing detailed comments and input into the Draft RMP.

The public lands of the west are used by many members of the flying community who choose to use their personal aircraft to fly to destination airstrip for recreational activities. Once on the ground they pursue common types of outdoor recreational, like camping, taking day hikes and participating in other outdoor activities such as hunting, fishing, wildlife viewing, photography, bird watching, studying plants, and looking at the natural landforms, all by means of using the airstrip as an internal trailhead. Airstrips provide the lowest impact on the land of any means to access interior portions of the landscape.



Charted and uncharted public airstrips are found throughout the west on BLM lands. For example, in Montana there are six grass airstrips located within the BLM managed Upper Missouri Breaks National Monument. The airstrips date back to the 1950s and existed for various public uses until they were officially recognized by the Monument RMP which was finalized in January, 2008. The Monument RMP provides for their public use and casual maintenance, and with no requirement for BLM authorization prior to aircraft use. See attachment A.

The Price, Utah BLM district has five airstrips (also dating prior to NEPA) which are recognized in their RMP (finalized October 2008), one of which is in a Wilderness Study Area. Various levels of maintenance are authorized, depending on airstrip location. No pre-use authorization is required of pilots. More detailed information on these two management areas is found in attachment B.

Within the Colorado River Valley RMP area are at least two airstrips suitable for recreational use. They are Tepee Creek and Roan Cliffs. A Google Map of each airstrip is included with this letter. There may well be other suitable recreational airstrips within the planning area and if so, they should be considered for inclusion in the final RMP.

The following are specific comments on the draft RMP.

- 1) In the executive summary, page six, under Issue Identification 1, the words *“improve public access”* are used. In Issue Identification 2, there is mention of *“providing a variety of recreational opportunities”*. Yet, there is no mention of providing for aviation opportunities in the draft plan. There is no mention of existing airfields that provide recreational access, despite the fact that such airfields do exist.
- 2) In Chapter 2-74, Recreation and Visitor Services, the goal for Alternatives B, C and D is *“Produce a diversity of quality recreational opportunities that support outdoor-oriented life styles and add to participants’ quality of life while contributing to the local economies”*. However, the draft plan makes no mention of providing opportunities for aviators. In fact, the draft plan takes the opposite approach on page 2-84 under Water and Air Travel: *“Air: Require all motorized aircraft..... to have a use authorization for take-off and landing locations on BLM lands or waterways”*. This statement needs to be deleted and new language inserted that provides access to authorized BLM airstrips and waterways that are recognized in the final RMP. Also, provision must be made to provide for unrestricted access to other landing sites that may be authorized in the future. What other user is required to obtain pre-authorization for land access?
- 3) In Chapter 3.3.3, Accessibility: Airstrips provide a means of achieving some of the desired goals mentioned in the text, specially the lack of means to reach more remote region due to health, age or other disabilities.
- 4) In Chapter 3.3.4, new language to be as a stand-alone portion of Travel Management portion of the RMP. The RAF proposes the following: *“Recreation aviation can be an integral part of balanced recreational travel plan. Recreational airstrips can serve as internal trailheads, providing a means of minimal impact access to many regions of BLM lands. Two airstrips are specifically authorized for public access without preauthorization: Roan Cliffs and Tepee Creek. Management criteria can be found in Appendix O of the final RMP.”*

Conclusion: The Colorado River Valley RMP should contain specific reference to and provide for unrestricted public use of two airstrips: Roan Cliffs and Tepee Creek. There should be no requirements for pre-authorization prior to use. The final RMP needs to provide guidance for the maintenance of the two

airstrips. The RAF has been working with the BLM at both the state and national level. See attachment C. Recreational airstrips are a legitimate use of BLM lands as cited below:

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d. Water and Air. Resource Management Plans shall address access across BLM-Managed lands to federal- and state-owned waters and for aircraft landings on land and water. Recreational backcountry airstrips can be an integral part of a balanced and efficient transportation system. Backcountry airstrip designations need to be consistent with the goals and objectives for the planning area and applicable Federal Aviation Administration regulations.

#### **AVIATION SUPPORT GROUP**

I am an avid outdoor enthusiast and also a pilot. I am concerned about the current draft for the Colorado River Valley RMP. The possible action to “Require all motorized aircraft, including but not limited to airplanes, helicopters, and ultralights, to have a use authorization for take-off and landing locations on BLM lands or waterways” is limiting and unnecessary for the recreational use of the current airstrips inside the CRV including, but not limited to Roans Cliff and Tepee Creek airstrips. The Recreational Aviation Foundation (RAF), the Aircraft Owners and Pilots Association (AOPA), and the Colorado Pilots Association (CPA) have all submitted positions and wording changes for the Draft RMP and I support these positions. For years I have enjoyed the use of recreational airstrips around the country on BLM and public land. These inclusions have provided me and my family the opportunity to enjoy the outdoors in ways we couldn’t have otherwise. In fact, several landing strips in Utah currently sit on BLM land. Through continued cooperation of various pilot groups and the BLM, these airstrips have provided a great way to enjoy remote access to public land. The RAF, AOPA, and the CPA have submitted wording changes and positions statements that I support.

#### **WINTER CLOSURES GROUP 1**

1. BLM proposes to almost double winter closures by closing an additional 81,500 acres to over the snow travel and limit snowmobiles to trails on additional 14800 acres (twice current amount) but no maps of open or closed areas is provided – how is the public going to ever know where boundaries are located
2. BLM provides a lot of information on a lot of issues that is very poorly organized and often simply not relevant to most users. There is simply no analysis of why any changes are needed for winter recreation management, and without analysis it makes it very hard to for the public to explain why they are opposed to the plan
3. no maps of trails in designated trails areas is provided- these are critical to any analysis and comment as often trails summer motorized trails are closed in the winter and non-motorized trails are opened. A lack of sufficient maps is the primary reason the White River National Forest separated their resource plan from their travel plan
4. without area designations or maps we have to question how NEPA analysis could be sufficient
5. Maps are always provided in other agency proposals for travel plans- White River National Forest had numerous maps for winter use proposals that provided specific trails to be designated, open area boundaries and closure areas.

6. BLM wants to manage with an assumption that areas are closed unless posted open- contrary to management of most other public areas where it is assumed to be open unless posted otherwise

7. Similar to the White River National Forest- the Colorado Valley should withdraw the travel plan portion of the Resource Plan and create additional maps and analysis for winter recreation to satisfy NEPA and to allow for meaningful public comment

#### **OIL AND GAS SUPPORT GROUP 1**

We need energy to power our nation and we can only hope to increase our energy independence by developing our own energy resources, especially natural gas and oil. Many of our public lands managed by the BLM have substantial oil and gas reserves. It is important that the policies and procedures used to regulate oil and gas development are clear, consistent, and attainable.

#### **OIL AND GAS SUPPORT GROUP 2**

- Oil and gas development is important for our local and state economies;
- The BLM needs to take into account the many innovations of the industry. We shouldn't make the rules and policies so overly restrictive. A one-size-fits-all policy doesn't help protect the quality of our air, environment or our communities;
- The restrictions in the draft would put western slope gas at a grave cost disadvantage to other gas plays in other parts of Colorado;
- The draft contains blatantly wrong estimates about reasonable foreseeable development because the BLM's underlying analysis fails to recognize the advancements that have made shale production economic in recent years; and
- The draft fails to contemplate that Colorado already has the most restrictive oil and gas regulations in the world.

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