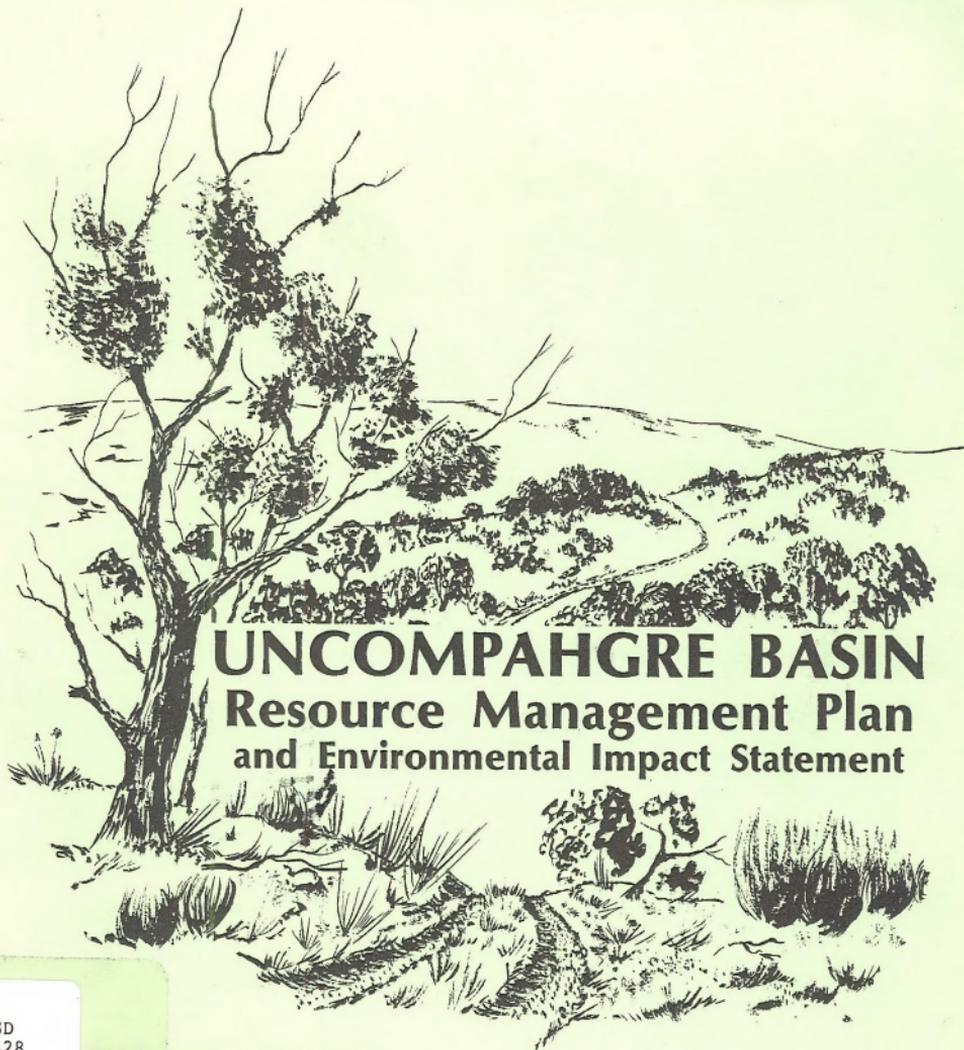




88063983

Final
September 1988



UNCOMPAHGRE BASIN

Resource Management Plan and Environmental Impact Statement

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1988

Department of the Interior
Bureau of Land Management
Montrose District, Colorado
Uncompahgre Basin Resource Area





United States Department of the Interior

BUREAU OF LAND MANAGEMENT
MONTROSE DISTRICT OFFICE
2465 SOUTH TOWNSEND
MONTROSE, COLORADO 81401



IN REPLY REFER TO:

Dear Reader:

Enclosed for your review is the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Uncompahgre Basin Planning Area. The Proposed Resource Management Plan, hereinafter referred to as the Proposed Plan, is a refinement of the Preferred Alternative in the Draft Uncompahgre Basin RMP/EIS, with consideration given to public comment analysis, corrections, and rewording for clarification. The Proposed RMP and Final EIS is published in an abbreviated format and is designed to be used in conjunction with the Draft Uncompahgre Basin RMP/EIS which was released in June 1987.

The Proposed Plan is the Bureau of Land Management's proposed action. With the exception of the recommendations for the Camel Back, Adobe Badlands, and Gunnison Gorge Wilderness Study Areas, all parts of this Proposed Plan may be protested in accordance with the planning regulations, 43 CFR 1610.5-2. Protests shall be in writing and sent to the Director (760), Bureau of Land Management, Room 909, Premier Building, 1725 I Street, N.W., Washington, D.C. 20240, within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register. The protest shall include the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed decision is believed to be wrong.

At the end of the 30-day protest period, and after the Governor's consistency review, the Proposed Plan, excluding any portions under protest, shall become final. Approval shall be withheld on any portion of the Proposed Plan under protest until final action has been completed on such protest. The Record of Decision and Final Resource Management Plan will then be published.

Sincerely,

Alan L. Kesterke
District Manager



#18724863

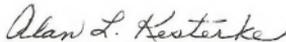
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UNCOMPAHGRE BASIN
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT
SEPTEMBER 1988

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DENVER, COLORADO 80225

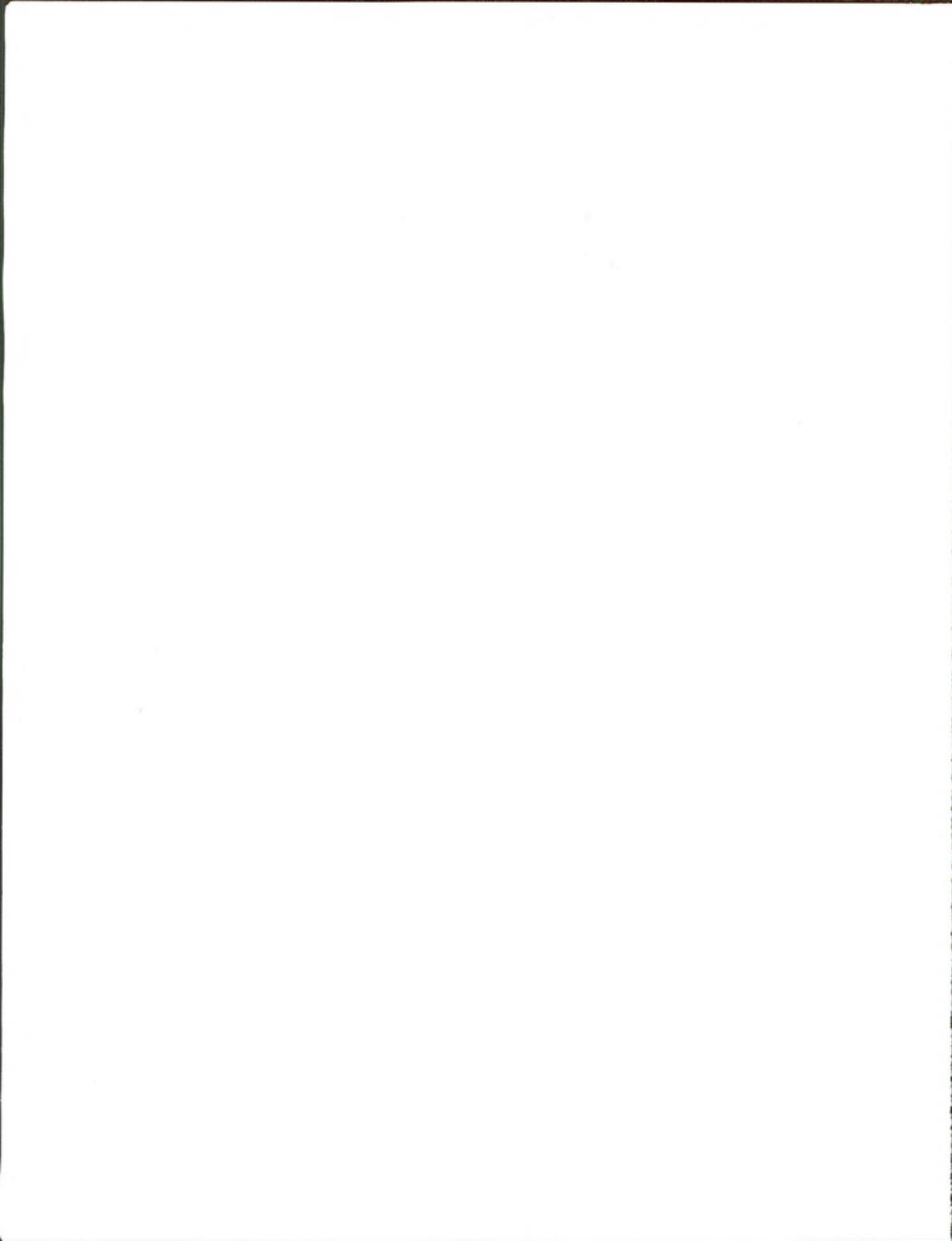
Prepared by:
United States Department of the Interior
Bureau of Land Management
Colorado State Office
Montrose District
Uncompahgre Basin Resource Area



District Manager, Montrose



State Director, Colorado



**UNCOMPAHGRE BASIN
PROPOSED RESOURCE MANAGEMENT PLAN
AND
FINAL ENVIRONMENTAL IMPACT STATEMENT**

Draft () Final (X)

Lead Agency: The United States Department of the Interior, Bureau of Land Management

Type of Action: Administrative (X) Legislative ()

This is the Proposed Resource Management Plan and Final Environmental Impact Statement for the Uncompahgre Basin Planning Area of the Uncompahgre Basin Resource Area.

This document responds to public comments on the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement. It corrects errors made in the Draft RMP/EIS and, based on public comments and internal BLM review, refines and modifies the Draft RMP/EIS Preferred Alternative. The modified Preferred Alternative is the Bureau of Land Management's Proposed Resource Management Plan.

This document incorporates by reference the Draft RMP/EIS which was released in June 1987; the Draft RMP/EIS must be used in conjunction with the Proposed RMP and Final EIS.

For further information on this Proposed Resource Management Plan and Final Environmental Impact Statement, contact Allan J. Belt, Area Manager, Bureau of Land Management, Uncompahgre Basin Resource Area, 2505 South Townsend Avenue, Montrose, Colorado 81401; telephone 303-249-7791 (commercial) or FTS 322-7300.

Protests to this Proposed Resource Management Plan must be received within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register.

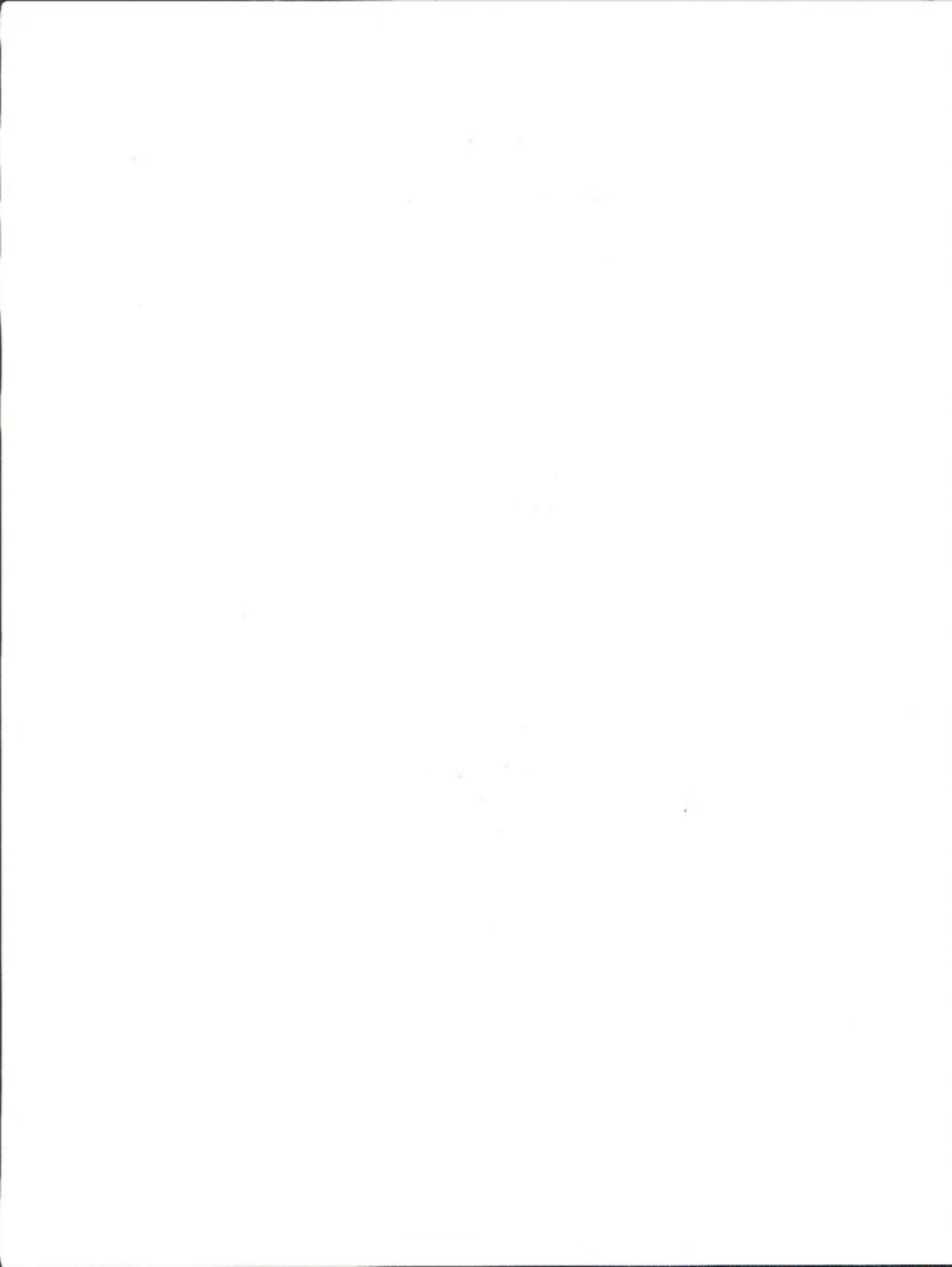


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SUMMARY OF THE PROPOSED PLAN

This Proposed Resource Management Plan identifies the future management of the public lands in the Uncompahgre Basin planning area portion of the Uncompahgre Basin Resource Area in west-central Colorado. The Proposed Plan is a modified version of the Preferred Alternative presented in the Draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement (RMP/EIS), June 1987. A summary of the Proposed Plan by affected resource or resource use follows.

AIR QUALITY

Existing air quality would be maintained. All actions would comply with air quality standards and regulations.

COAL

Existing coal leases on 26,663 acres would be continued. Approximately 83,334 acres of federal coal estate in the Paonia/Somerset and Bookcliffs coal areas would be identified as acceptable for further coal leasing consideration. There are an additional 1,756 acres of federal coal reserves under private surface and within the Gunnison National Forest boundary. Approximately 920 acres would be acceptable for further coal leasing consideration with stipulations.

OIL, GAS, AND GEOTHERMAL RESOURCES

Leasing of federal oil, gas, and geothermal estate would be allowed on 484,349 acres with standard lease terms. There would be a yearlong no surface occupancy stipulation on 9,135 acres, and seasonal stipulations on 176,076 federal surface acres and on 16,136 acres of non-federal surface where the government holds the oil and gas mineral rights. Seasonal stipulations would also apply to seismic activities. The Gunnison Gorge WSA (21,038 acres) would be closed to leasing.

LOCATABLE MINERALS

Existing withdrawals currently close 59,250 acres to mineral entry and location under the mining laws. Under the proposed plan, it would be recommended that these withdrawals be retained on 9,440 acres, which includes the Needle Rock ONA/ACEC, and revoked on 49,890 acres. Revocation of the withdrawals would open 49,890 acres to mineral entry and location. The Gunnison Gorge WSA, the Escalante Canyon ACEC, and the Fairview RNA/ACEC (23,310 acres) would be closed to mineral entry and location. Mineral entry and location would be allowed

on the remainder of the federal mineral estate (642,392 acres).

MINERAL MATERIALS

Disposal of mineral materials would be allowed on 444,532 acres of public land with federal mineral estate. Disposal of mineral materials would be subject to seasonal restrictions on 63,174 of these acres, and would require review by the agency holding the withdrawal on 9,360 acres. Disposal of mineral materials would not be permitted on 36,493 acres.

SOILS AND WATER RESOURCES

Water quality and erosion conditions would be inventoried and monitored. All actions under the proposed plan would comply with water quality standards and regulations. Approximately 26,547 acres, including the Elephant Skin Wash project, would be intensively managed to reduce salinity loads in the Colorado River. Projects and special protective measures would be developed. Projects designed to reduce runoff, erosion, and sediment on 47,260 acres could be developed if they would not conflict with big game and riparian habitat management, livestock grazing, and forest management.

RIPARIAN ZONES

Riparian zones on 6,320 acres would be improved through implementation of special protective and restorative measures. Riparian zones in the remainder of the planning area would be maintained in their present condition.

THREATENED AND ENDANGERED SPECIES

One ACEC, one RNA/ACEC, and one ONA/ACEC (a total of 9,055 acres) would be designated to protect threatened and endangered plants and unique plant associations, and to identify recreation hazards. Measures to protect threatened and endangered species would be required in plans for all surface-disturbing activities. Habitat suitable for bald eagles, peregrine falcons, and river otters would be maintained in the Gunnison Gorge area.

WILDLIFE HABITAT

Approximately 67,320 acres would be intensively managed as crucial deer and elk winter range. Big game forage allocations would be maintained at present levels. A total of 3,292 acres in the Storm King area would be

SUMMARY

intensively managed as elk calving habitat. Approximately 1,990 acres along the Gunnison River west of Delta would be intensively managed and improved for waterfowl habitat. Seventy (70) miles of streams would be intensively managed to restore and protect aquatic habitats. Habitat in the Gunnison Gorge and Camel Back areas would be managed for bighorn sheep; disturbances in these areas would be minimized.

LIVESTOCK GRAZING

Public lands would be managed as "I" category (336,562), "M" category (74,817 acres), and "C" category (39,033 acres) grazing allotments. Suitable unallotted lands on 26,873 acres would be considered for grazing use authorizations except on areas where wildlife has priority for forage. No livestock grazing would be allowed on 5,792 acres. Grazing use would be managed at present forage allocation levels. Land treatments and project developments would be restricted on 151,690 acres. Grazing use would be restricted (season of use, percent utilization) on 39,590 acres.

FORAGE ALLOCATION

Wildlife would have priority for allocation of future additional forage on 72,342 acres; livestock would have priority on 186,810 acres. Future additional forage on 193,612 acres would be divided evenly between wildlife and livestock. No additional forage would be allocated on the Adobe Badlands ONA/ACEC.

FORESTRY

Commercial forests on 3,127 acres (estimated allowable harvest of 160.5 MBF/year) and suitable woodlands on 24,255 acres (estimated allowable harvest of 1,213 cords/year) would be managed for sustained yield production. Seasonal restrictions would apply on 1,606 acres of commercial forest lands.

RECREATION

The outer portion of the Gunnison Gorge area (40,792 acres) would be managed for motorized and non-motorized recreation opportunities. Until a decision is made on wilderness designation, the Gunnison Gorge WSA would be managed for non-motorized recreation and whitewater boating opportunities. Boating use would be managed for six to ten group encounters per day, with commercial trips limited to one per day.

The Needle Rock area would be managed as an ONA/ACEC. The Escalante Canyon ACEC would be managed and developed for recreation use that would not conflict with threatened and endangered plants. The Adobe Badlands

ONA/ACEC would be managed for its scenic qualities and for non-motorized recreation opportunities.

The lower Gunnison River, below the Escalante Bridge, would be managed for boating opportunities. River access would be developed and maps and information provided. A portion of the adobes north of Delta (8,942 acres) would be managed for ORV use. The remainder of the planning area would be managed for extensive recreation use.

OFF-ROAD VEHICLES

Approximately 224,276 acres would be managed as open to ORV use; 38,600 acres would be closed to ORV use. Vehicle use would be limited to designated roads and trails yearlong on 56,974 acres. There would be seasonal vehicle-use limitations on 163,227 acres.

CULTURAL RESOURCES

Cultural resources would be protected from surface-disturbing activities as required by law. A Class III inventory would be conducted on 5,848 acres west of Montrose and Olathe. Some identified high-value sites would be assigned a long-term protective classification.

VISUAL RESOURCES

Visual resources would be managed according to VRM guidelines, with 27,901 acres under VRM Class I; 27,384 acres under VRM Class II; 293,417 acres under VRM Class III; and 134,375 acres under VRM Class IV.

WILDERNESS

The Gunnison Gorge WSA (21,038 acres) would be recommended as preliminarily suitable for designation as wilderness. The Camel Back WSA and Adobe Badlands WSA (a total of 20,827 acres) would be recommended as non-suitable for designation as wilderness.

The Camel Back area would be closed to ORV use and managed with emphasis on riparian system, wildlife habitat, and livestock grazing management. The major portion of the Adobe Badlands area would be managed as an ONA/ACEC; the remainder of this area would be managed as wildlife habitat.

MAJOR UTILITIES

Public lands on 301,006 acres would be open to development of major utility facilities. A total of 82,038 acres would be closed to utility development. Special stipulations and conditions would restrict utility development on 100,033 acres.

LAND TENURE ADJUSTMENTS

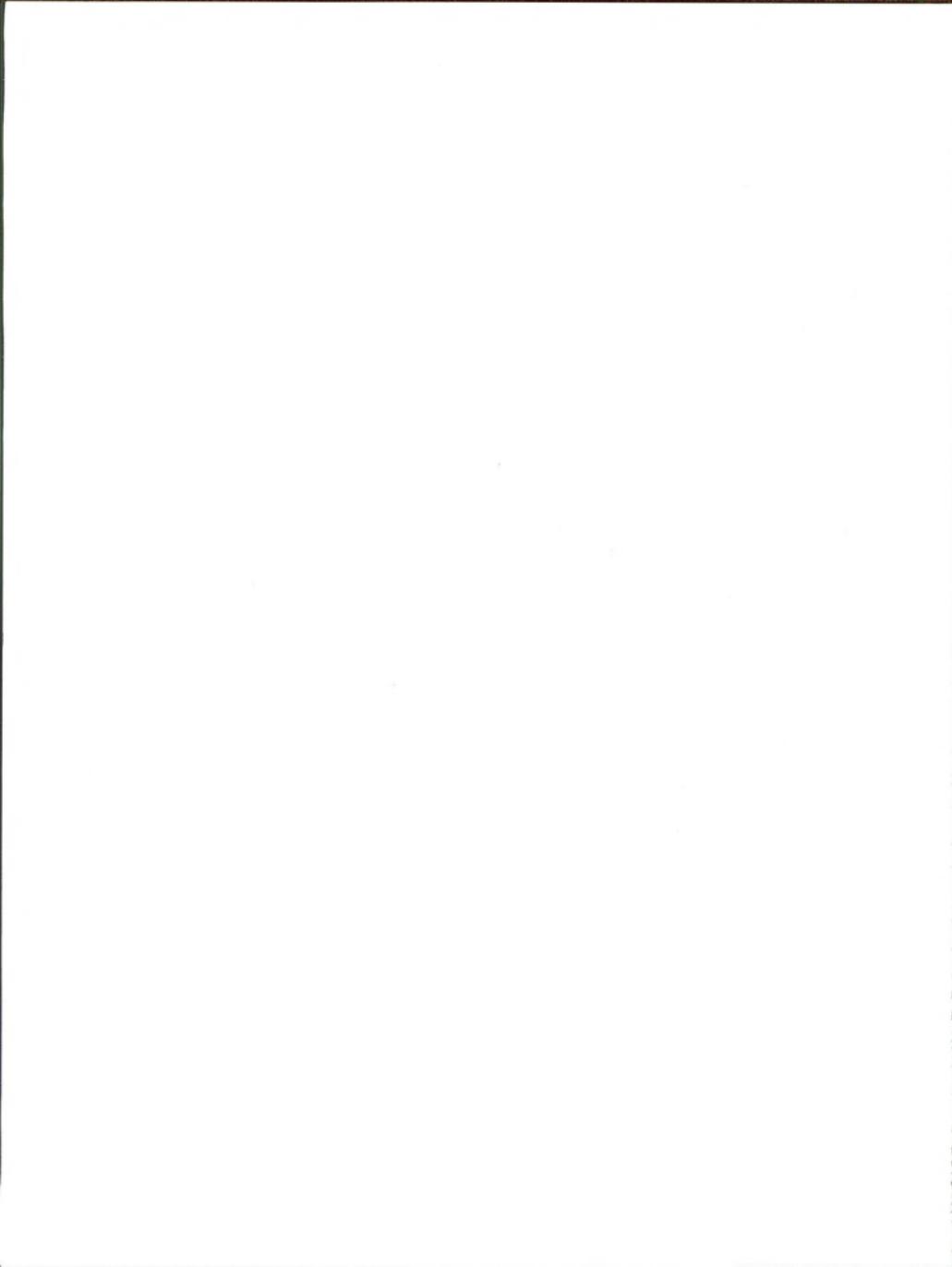
One hundred forty-three (143) tracts of public land (totalling 11,026 acres) scattered throughout the planning area would be considered suitable for disposal. Non-federal lands would be considered for acquisition through exchange opportunities if such lands meet established criteria and enhance resource management within management units.

ACCESS

Public access would be acquired into 16 public land areas.

FIRE MANAGEMENT

Public lands totalling 110,252 acres would be managed for intensive fire suppression; 202,895 acres would be managed for conditional fire suppression. Prescribed fire would be permitted on 169,930 acres.



INTRODUCTION

This is the Proposed Resource Management Plan (RMP) and Final Environmental Impact Statement (EIS) for the Uncompahgre Basin Planning Area. The RMP/EIS was prepared in accordance with planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA). Included in this document are the public comments on the Draft Uncompahgre Basin RMP/EIS of June 1987 (Draft RMP/EIS), the Bureau of Land Management's (BLM's) responses to the public comments, the changes and corrections to the Draft Uncompahgre Basin RMP/EIS, and the Proposed Resource Management Plan.

The Proposed Resource Management Plan (Proposed Plan) identifies the future management of the public lands in the Uncompahgre Basin planning area portion of the Uncompahgre Basin Resource Area in west-central Colorado. The planning area encompasses a total of approximately 1.38 million acres in the BLM's Montrose District. The BLM has administrative responsibility for the public lands and resources on 483,077 surface acres and 755,923 acres of mineral estate within the planning area.

The Proposed Plan is very similar to the Preferred Alternative that was analyzed in the Draft RMP/EIS. In response to public comments and internal BLM review, several changes were made to the Preferred Alternative as it was developed into the final Proposed Plan. The major changes are as follows.

Oil, Gas, and Geothermal Resources. Leasing conditions for the Escalante Canyon ACEC and the Fairview RNA/ACEC were changed from standard lease terms to leasing with no surface occupancy. Leasing conditions for the Adobe Badlands ONA/ACEC were changed from standard lease terms with a seasonal restriction to leasing with no surface occupancy. The changes were based on public comments and managements' concern for protection of the resource values within the special management areas.

In this Proposed Plan, the scope of the oil and gas program has been expanded to include an analysis of split-estate management for oil and gas resources. Split-estate lands are those lands where the surface estate is owned by one entity and the mineral estate is owned by another. Throughout this document, split-estate will refer to non-federal surface with federal oil and gas resources. The decision to broaden the scope to include an analysis of split-estate lands was based on information resulting from the resolution of the BLM's authority in split-estate leasing precipitated by the resolution of protests on several recent BLM RMPs, including the Little Snake RMP.

The authority and legal responsibility of the BLM when issuing oil and gas leases on split-estate lands is covered under the following statutes:

Federal Land Policy and Management Act (FLPMA)
National Environmental Policy Act (NEPA)
National Historic Preservation Act (NHPA)
Endangered Species Act (ESA)

The BLM recognizes that it does not have the legal authority to regulate how a surface owner manages his or her property. However, the above statutes give the agency the statutory authority and responsibility to take reasonable measures to avoid or minimize environmental impacts that may result from federally-authorized mineral lease activities. This authority exists regardless of whether the surface is federally-owned or not.

Locatable Minerals. The Escalante Canyon ACEC and the Fairview RNA/ACEC, previously open to mineral entry and location, would be withdrawn from entry and location. These changes were based on public comments and managements' concern for protection of the resource values within the special management areas.

Mineral Materials. The Adobe Badlands ONA/ACEC, previously open for disposal of mineral materials with a seasonal (spring) restriction, would be closed to disposal of mineral materials. This change was based on the need to protect the values within the ONA/ACEC and also because mineral materials are readily available elsewhere in the planning area.

Riparian Areas. Under the Proposed Plan, livestock grazing use would not be permitted in riparian zones (within Management Unit 9) from March 1 through range readiness. The 35 percent utilization restriction would be used as general guidance for improvement, but could vary depending on the individual area. This change was based on the fact that differences in vegetative condition do exist between riparian areas. The 35 percent utilization limit would be implemented if necessary, but it was felt that substantial improvement could be achieved through implementation of other strategies, such as changes in the season of use.

Recreation. Under the Proposed Plan, the five-year period during which the BLM would manage use and activities in the Storm King Peak area to be compatible with potential ski area development would be eliminated. This change was based on the importance of the area's wildlife and timber values.

Off-Road Vehicles. Under the Proposed Plan, the 10,402 acres within the Camel Back WSA would be closed to ORV use. This change was based on the needs to prevent accidental destruction of threatened and endangered plants

INTRODUCTION

as a result of ORV use, to protect visual qualities, and to reduce active erosion.

Special Management Areas. Approximately 6,783 acres within the Adobe Badlands WSA would be designated as the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). This change was based on the needs to protect the area's unique scenic qualities and its threatened and endangered plants, and to reduce active erosion.

Land Tenure Adjustments. Approximately 16,398 acres previously identified for consideration for disposal have been placed in the retention category. This change was based on public comments and managements' concern that certain tracts, especially larger blocks or tracts with public use values, be retained in public ownership.

REVIEW OF THE DRAFT RMP/EIS

AVAILABILITY AND REVIEW

The Draft Uncompahgre Basin RMP/EIS was filed with the Environmental Protection Agency (EPA) in July of 1987. A notice of availability and an announcement of the public hearings schedule was published in the *Federal Register*, August 7, 1987, page 29445. This same notice established a 90-day public comment period expiring on November 5, 1987.

News releases provided information on how to obtain copies of the Draft RMP/EIS and Draft Wilderness Technical Supplement (WTS), the locations at which the drafts could be reviewed, and the address for submission of written comments. Additional news releases announced the schedules for the formal public hearings which were held in Hotchkiss, Colorado, on September 22, 1987; in Lakewood, Colorado, on September 24, 1987; and in Montrose, Colorado, on September 29, 1987.

DISTRIBUTION OF THE DRAFT RMP/ EIS

Approximately 800 copies of the Draft RMP/EIS and Draft WTS were distributed to federal, state, and local governments and agencies, Congressional and Legislative offices, private interest groups and organizations, academic and business institutions, and individuals. Distribution was by use of volume mailing and in response to individual requests for the documents. Copies of the documents were also available for public review and distribution in the BLM's Montrose District Office and Uncompahgre Basin Resource Area Office.

The cover letter in the Draft RMP/EIS solicited comments on both the Draft RMP/EIS and the Draft WTS from all recipients and reviewers.

The distribution list for the Draft RMP/EIS and Draft WTS included the following agencies and organizations in addition to approximately 500 individuals and businesses.

FEDERAL AGENCIES

Department of the Interior

Bureau of Land Management
Headquarters Planning Office
Colorado State Office
Canon City District Office

Craig District Office
Grand Junction District Office
Montrose District Office
Bureau of Mines
Bureau of Reclamation
Fish and Wildlife Service
National Park Service
Black Canyon of the Gunnison National Monument
Minerals, Water, and Air Quality Office

Department of Agriculture

Forest Service
Supervisor's Office; Grand Mesa-Uncompahgre-Gunnison National Forest
Ouray Ranger District
Paonia Ranger District
Soil Conservation Service
Delta Conservation District
Shavano Conservation District

Department of Energy

Western Area Power Administration

Other Federal Agencies

Environmental Protection Agency
Federal Highway Administration
Advisory Council on Historic Preservation

COLORADO STATE AGENCIES

Department of Agriculture
Department of Natural Resources
Division of Parks and Outdoor Recreation
Division of Wildlife
Colorado Natural Areas Program
Mined Land Reclamation Board
Natural Heritage Inventory
State Clearinghouse
State Historic Preservation Officer
District 10 Regional Planning Commission

COUNTY GOVERNMENTS AND AGENCIES

Delta County

Board of County Commissioners
Planning Commission
Planning Department

REVIEW OF THE DRAFT RMP/EIS

Montrose County

Board of County Commissioners
Planning Commission

Ouray County

Board of County Commissioners
Land Use Administrator

Gunnison County

Board of County Commissioners
Planning Commission

Mesa County

Board of County Commissioners
Policy and Research Office

MUNICIPAL GOVERNMENTS

City of Delta
City of Montrose
Town of Cedaredge
Town of Crawford
Town of Hotchkiss
Town of Olathe
Town of Orchard City
Town of Ouray
Town of Paonia
Town of Ridgway

CONGRESSIONAL AND LEGISLATIVE OFFICES

Distribution was made to the offices of Senator William L. Armstrong, Senator Timothy E. Wirth, and Congressman Ben Nighthorse Campbell, and to the offices of State Senators Robert DeNier and Robert Pastore, and State Representatives Ed Carpenter and Margaret Masson.

INTEREST GROUPS AND ORGANIZATIONS

American Wilderness Alliance
Audubon Society, Western Colorado Chapter
Chipeta Chapter, Colorado Archeology Society
Club 20
Colorado Historical Society
Colorado Mining Association
Colorado Mountain Club
Colorado Native Plant Society
Colorado Open Space Council
Colorado Trail Riders

Continental Divide Trail Society
Delta County Cattlemen's Association
Ducks Unlimited, Montrose Chapter
Grand Junction Geological Society
Gunnison County Stockgrowers' Association
Gunnison River Coalition
League of Women Voters
Minerals Exploration Coalition
Montrose County Chamber of Commerce
National Council of Public Land Users
National Wildlife Federation
Natural Resources Defense Council
The Nature Conservancy
North Fork Woolgrowers' Association
Ouray County Alliance
Ouray County Cattlemen's Association
Paonia Chamber of Commerce
Rocky Mountain Oil and Gas Association
Sierra Club, Rocky Mountain Chapter
Sierra Club, Uncompahgre Group
Society for Range Management
Southern Ute Tribe
Trout Unlimited, Montrose Chapter
Uncompahgre Valley Livestock Association
United Four Wheel Drive Association
Ute Mountain Tribe
Western Colorado Congress
Western Organization of Resource Councils
Western Slope Energy Research Center
Western Slope Woolgrowers' Association
Western Small Miners' Association
The Wilderness Society
Wildlife Management Institute
The Wildlife Society

PUBLIC COMMENTS

Fifty-one persons testified at the public hearings in Hotchkiss, Lakewood, and Montrose, Colorado. One hundred seventy-three (173) persons, groups, or agencies submitted written comments.

The transcripts of the public hearings and the written comments are reproduced in this document immediately following Table 2. Table 1 and Table 2 identify the commenters; the commenter number (first column of each table) appears in the upper right corner of the reproduced transcripts and written comments. The numbers in the third column of each table also appear in the margins of the reproduced transcripts and comment letters; they correspond to the BLM's responses to the questions and concerns that were brought forward in the testimony and in the written comments. The comment responses follow the transcripts and comment letters.

REVIEW OF THE DRAFT RMP/EIS

Table 1
 PERSONS WHO TESTIFIED AT THE PUBLIC HEARINGS

| COMMENTER NUMBER | COMMENTER | RESPONSE NUMBER |
|------------------|--|---------------------------------------|
| H-1 | L.T. Mangum; City of Delta; Delta, Colorado | 61 |
| H-2 | W.N. Brunner; Paonia, Colorado | 1, 5, 6, 18, 48, 67, 68, 85, 127, 136 |
| H-3 | Mark Welsh; Hotchkiss, Colorado | 13, 42 |
| H-4 | David Johnston; Paonia, Colorado | 68, 136 |
| H-5 | John B. Benjamin; Hotchkiss, Colorado | 12 |
| H-6 | Caleb Gates; Paonia, Colorado | 68, 70, 136 |
| H-7 | Stephen F. Hinchman; Paonia, Colorado | 7, 136, 137 |
| H-8 | Mark Paigen; Paonia, Colorado | 12, 68, 69, 136 |
| H-9 | Gerrie Wolf; Cedaredge, Colorado | 9, 66 |
| H-10 | Hank Hotze; Gunnison River Expeditions; Hotchkiss, Colorado | 12, 68, 69, 136 |
| H-11 | Robin Nicholoff; Hotchkiss, Colorado | 9, 13, 68, 69, 136 |
| H-12 | John Groome; Paonia, Colorado | 68, 69, 136 |
| H-13 | Jerry Price; Whistling Acres Ranch; Paonia, Colorado | 14 |
| L-1 | John Stansfield; Sierra Club, Pikes Peak Group; Monument, Colorado | 68, 136 |
| L-2 | Carl Gerity; Quinn Coal Company; Golden, Colorado | 34 |
| L-3 | Bill Foreman; Boulder, Colorado | 28, 68, 136 |
| L-4 | Kirk Cunningham; Boulder, Colorado | 28, 68, 136 |
| L-5 | Todd Robertson; Denver, Colorado | 28, 68, 69, 136 |
| L-6 | Earl Jones; Boulder, Colorado | 68, 136 |
| L-7 | Karin Molliver; Boulder, Colorado | 28, 68, 136 |
| L-8 | Rocky Smith; Denver, Colorado | 28, 68, 69, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 1 (continued)

| COMMENTS NUMBER | COMMENTS | RESPONSE NUMBER |
|--------------------|---|---|
| L-9 | Allison Graves; CU Wilderness Study Group; Boulder, Colorado | 28, 68, 69, 136 |
| L-10 | Steve Pettit; Boulder, Colorado | 68, 136 |
| L-11 | Bruce Robson; Boulder, Colorado | 28, 68, 69, 136 |
| L-12 | Roz McClellan; Boulder, Colorado | 21, 68, 136 |
| L-13 | Norm Mullen; Boulder, Colorado | 28, 68, 69, 136 |
| L-14 | Marty Walter; Boulder, Colorado | 68, 69, 136 |
| L-15 | Eleanor Von Barga; Colorado Native Plant Society; Denver, Colorado | 68, 136 |
| L-16 | Scott Hatfield; Boulder, Colorado | 68, 69, 136 |
| L-17 | Dave Allured; Boulder, Colorado | 2, 28, 60, 68, 69, 136 |
| L-18 | Donald Thompson; Denver, Colorado | 68, 69, 136 |
| L-19 | Polly Mills; Boulder, Colorado | 68, 136 |
| L-20 | Jennie Spencer; CU Environmental Center; Boulder, Colorado | 68, 136 |
| L-21 | Kirk Koepsel; Colorado Environmental Coalition; Denver, Colorado | 19, 20, 22, 24, 28, 29, 31, 33, 42, 45, 46, 47, 63, 67, 68, 69, 72, 85, 94, 104, 119, 136 |
| M-1 | Kenneth Gray; Delta, Colorado | 121 |
| M-2 | Melvin Thomas Gore; Delta, Colorado | 65, 67 |
| M-3 | Jo Gore; Delta, Colorado | 65, 105, 121 |
| M-4 | Mark Pearson; Sierra Club, Rocky Mountain Chapter; Grand Junction, Colorado | 68, 69, 136 |
| M-5 | Les Hamilton; Uncompahgre Cattle Company; Delta, Colorado | 121 |
| M-6 | John Musser; Delta, Colorado | 121, 134 |
| M-7 | Walter Rule; Ouray, Colorado | 68, 69, 136 |
| M-8 | Linda Delman; Montrose, Colorado | 68, 69, 136 |
| M-9 | Bill Harris; Colorado Archeological Society, Chipeta Chapter; Montrose, Colorado | 123, 124, 125 |

REVIEW OF THE DRAFT RMP/EIS

Table 1 (continued)

| COMMENTER NUMBER | COMMENTER | RESPONSE NUMBER |
|------------------|---|-------------------------|
| M-10 | Stuart Krebs; Montrose, Colorado | 64, 68, 136 |
| M-11 | W.D. Wetlaufer; Montrose, Colorado | |
| M-12 | John Baldus; Western Colorado Congress and Uncompahgre Valley Association; Montrose, Colorado | 22, 28, 46, 69, 85, 107 |
| M-13 | Dave Seymour; Uncompahgre Livestock Association; Olathe, Colorado | 67 |
| M-14 | Deborah Gore; Olathe, Colorado | 121, 131 |
| M-15 | Richard Gore; Olathe, Colorado | 111, 121, 131 |
| M-16 | Bill Hamilton; Cedaredge, Colorado | |
| M-17 | Herschel "Bud" Burgess; Eckert, Colorado | |

REVIEW OF THE DRAFT RMP/EIS

Table 2
PERSONS WHO SUBMITTED WRITTEN COMMENTS

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|--|---|
| 1 | Bureau of Reclamation; Upper Colorado Regional Office; Salt Lake City, Utah | 49, 50, 71, 85, 87, 88, 89, 90, 91, 92, 93, 97, 128 |
| 2 | U.S. Geological Survey; Assistant Director for Engineering Geology; Reston, Virginia | 38, 39 |
| 3 | Bureau of Mines; Intermountain Field Operations Center; Denver, Colorado | 35, 71 |
| 4 | National Park Service; Rocky Mountain Region; Denver, Colorado | 16, 17, 68 |
| 5 | U.S. Forest Service; Grand Mesa-Uncompahgre-Gunnison National Forests; Delta, Colorado | 15, 108 |
| 6 | U.S. Air Force; Regional Civil Engineer Central Region; Dallas, Texas | 57 |
| 7 | U.S. Fish and Wildlife Service; Fish and Wildlife Enhancement; Grand Junction, Colorado | 11, 85, 99 |
| 8 | Environmental Protection Agency; Region 8; Denver, Colorado | 23, 24, 25, 27, 33, 44, 71, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 101, 102, 118 |
| 9 | Colorado Department of Natural Resources; Office of the Executive Director; Denver, Colorado | 7, 24, 27, 28, 36, 37, 38, 53, 67, 83, 85, 94, 100, 103, 104, 109, 119, 136 |
| 10 | City of Delta; John R. Kappa, City Attorney; Montrose, Colorado | 10, 54, 71 |
| 11 | BLM Montrose District Advisory Council; Clay V. Bader, Chairman; Montrose, Colorado | 3, 13, 30, 67, 68, 102, 136 |
| 12 | BLM Montrose District Grazing Advisory Board; James Suckla, Chairman; Cortez, Colorado | 121 |
| 13 | Sierra Club Southwest Office; John Bradley; Boulder, Colorado | 68, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|---|---|
| 14 | Colorado Mountain Club; Babs Schmerler; Montrose, Colorado | 68, 69, 136 |
| 15 | Colorado Archaeological Society, Chipeta Chapter; Bill Harris; Montrose, Colorado | 123, 124, 125 |
| 16 | Colorado Environmental Coalition; Kirk Koepsel; Denver, Colorado | 22, 27, 28, 31, 32, 33, 42, 45, 46, 47, 63, 67, 68, 69, 85, 94, 104, 119, 136 |
| 17 | Rocky Mountain Oil and Gas Association; Jess Cooper; Denver, Colorado | 8 |
| 18 | Minerals Exploration Coalition; John D. Wells; Lakewood, Colorado | 43, 56 |
| 19 | Audubon Society of Western Colorado; Richard Levad; Grand Junction, Colorado | 4, 68, 130, 136, 137 |
| 20 | Sierra Club, Rocky Mountain Chapter; Kirk Cunningham; Boulder, Colorado | 40, 70 |
| 21 | Delta County Livestock Association; John Botti; Crawford, Colorado | 66, 68, 111, 131, 136 |
| 22 | Sierra Club, Rocky Mountain Chapter; Mark Pearson; Grand Junction, Colorado | 2, 41, 42, 51, 52, 60, 66, 68, 69, 71, 84, 85, 120, 131, 134, 136 |
| 23 | Colorado Native Plant Society; Susan S. Martin; Fort Collins, Colorado | 24, 27, 28, 67, 68, 100, 103, 116, 119, 135, 136 |
| 24 | National Parks and Conservation Association; Terri Martin; Salt Lake City, Utah | 47, 59, 63, 67, 68, 85, 101, 102, 136 |
| 25 | Far Flung Adventures; Tracy Blashill; Ouray, Colorado | 12, 68, 136 |
| 26 | Richards and Richards; Shawn Mock; Nucla, Colorado | 66, 68, 136 |
| 27 | Richards and Richards; Shawn Mock; Nucla, Colorado | 86 |
| 28 | Campbell Cattle Company; David L. and Helen A. Campbell; Delta, Colorado | 66, 68, 86, 136 |
| 29 | Colorado Westmoreland, Inc.; Environmental Specialist; Paonia, Colorado | |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTS | RESPONSE NUMBER |
|-----------------------|---|--------------------------------------|
| 30 | Musser Ranches; John A. Musser; Delta, Colorado | 26, 67, 106, 113, 114, 121, 132, 133 |
| 31 | Colorado Ute Electric Association, Inc.; Environmental Services; Montrose, Colorado | 30, 58, 61, 71, 95, 112, 115 |
| 32 | Chevron U.S.A., Inc.; Legislative and Regulatory Affairs; Denver, Colorado | 8 |
| 33 | Jerry D. Jacka; Phoenix, Arizona | |
| 34 | Kate Palmer; Boulder, Colorado | 67, 70, 96 |
| 35 | Dr. Frank Dennehy; Grand Junction, Colorado | 68, 136 |
| 36 | Chuck Shepard; Mancos, Colorado | 68, 69, 136 |
| 37 | Everett V. Carter; Cedaredge, Colorado | 68, 69, 136 |
| 38 | Jan Hose; Aspen, Colorado | 68, 69, 136 |
| 39 | Kurt Johnson; Boulder, Colorado | 68, 136 |
| 40 | Dick T. Brown and Victor H. Reed; Olathe, Colorado | 85 |
| 41 | Michele K. Whitaker; Wheatridge, Colorado | 68, 69, 136 |
| 42 | John Spezia; Steamboat Springs, Colorado | 69 |
| 43 | Nina Johnson; Boulder, Colorado | 136 |
| 44 | Paul E. and Virginia D. Lappala; Carbondale, Colorado | 68, 69, 136 |
| 45 | Greg McKennis; Glenwood Springs, Colorado | 68, 69, 136 |
| 46 | Claire C. Poole, Psy.D.; Denver, Colorado | 62, 68, 69, 136 |
| 47 | John Spezia; Steamboat Springs, Colorado | 62, 68, 136 |
| 48 | Charla Hathaway Palmer; Steamboat Springs, Colorado | 68, 69, 136 |
| 49 | Gordon Rodda; Knoxville, Tennessee | 71, 136 |
| 50 | Larry Abbott; Grand Junction, Colorado | 6, 67 |
| 51 | W. Rodney McKinnon; Montrose, Colorado | 68, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|---|---------------------|
| 52 | Tony Merten; Lakewood, Colorado | 68, 69, 136 |
| 53 | John Czarnecki; Lakewood, Colorado | 68, 69, 136 |
| 54 | Richard Kilbury; Albuquerque, New Mexico | 68, 69, 136 |
| 55 | William A. Coates; Cascade, Colorado | 136 |
| 56 | Jon Tourville; Colorado Springs, Colorado | 68, 69, 136 |
| 57 | Lorraine Lane; Denver, Colorado | 69 |
| 58 | Chris Seitz; Salina, Kansas | 68, 69, 136 |
| 59 | Dr. Thomas Scott; Fort Collins, Colorado | 68, 136 |
| 60 | Janna J. Harper; Black Hawk, Colorado | 68, 69, 136 |
| 61 | Marv and Judy Kieca; Castle Rock, Colorado | 68, 136 |
| 62 | Julie M. Emerson; Littleton, Colorado | 69 |
| 63 | Julie M. Emerson; Littleton, Colorado | 68, 136 |
| 64 | Dan Roberts; Grand Junction, Colorado | 55, 67, 68, 69, 136 |
| 65 | Chuck Worley; Cedaredge, Colorado | 68, 136 |
| 66 | William J. Tembrock et al.; Hotchkiss, Colorado | 68, 69, 136 |
| 67 | Eric D. and Ellen B. Braaten; Denver, Colorado | 68, 69, 136 |
| 68 | Harry Kuperberg; Boulder, Colorado | 68, 69, 136 |
| 69 | Roger Hedlund; Winter Park, Colorado | 68, 136 |
| 70 | Victoria and William Coc; Durango, Colorado | 68, 136 |
| 71 | Jon Sirkis; Boulder, Colorado | 68, 69, 136 |
| 72 | Mary Sealing; Fruita, Colorado | 68, 136 |
| 73 | Timothy J. Cunningham; Boulder, Colorado | 62, 68, 69, 136 |
| 74 | Mark Meeks; Denver, Colorado | 68, 69, 136 |
| 75 | Lorraine Lane; Denver, Colorado | 68, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|--|-----------------|
| 76 | Jane Schleimer; Boulder, Colorado | 68, 69, 136 |
| 77 | Harley Orahood; Grand Junction, Colorado | 69, 136 |
| 78 | Mrs. Robert Gray; Delta, Colorado | 64 |
| 79 | Jan and Luce Pipher; Maher, Colorado | 86 |
| 80 | Bruce Berger; Aspen, Colorado | 68, 136 |
| 81 | Mark N. Williams; Grand Junction, Colorado | 68, 69, 136 |
| 82 | Kenneth E. and Cheri W. Pettis; Olathe, Colorado | 86 |
| 83 | Kenneth E. and Cheri W. Pettis; Olathe, Colorado | 68, 136 |
| 84 | Richard and Gary Dickerson; Olathe, Colorado | 86 |
| 85 | Richard and Gary Dickerson; Olathe, Colorado | 68, 136 |
| 86 | Mr. and Mrs. William Byers et al.; Delta, Colorado | 86 |
| 87 | Mr. and Mrs. William Byers et al.; Delta, Colorado | 66, 68, 136 |
| 88 | Alford L. Gray and Patricia Harris; Olathe, Colorado | 86 |
| 89 | Alford L. Gray and Patricia Harris; Olathe, Colorado | 66, 68, 136 |
| 90 | W. Rodney McKinnon; Montrose, Colorado | |
| 91 | Mike Campbell; Oak Creek, Colorado | 68, 69, 136 |
| 92 | Edward G. Talbot; Arvada, Colorado | 68, 136 |
| 93 | Leonard L. and Helen M. Burch; Olathe, Colorado | 86 |
| 94 | Leonard L. and Helen M. Burch; Olathe, Colorado | 68, 136 |
| 95 | Andrew McConkey; Boulder, Colorado | 68, 69, 136 |
| 96 | George C. Calhoun; Delta, Colorado | 68, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|--|-----------------|
| 97 | Nic Korte; Grand Junction, Colorado | 68, 69, 136 |
| 98 | Jack R. Williams; Florissant, Colorado | 68, 69, 136 |
| 99 | John M. Kuzmiak; Pueblo, Colorado | 68, 136 |
| 100 | Al Hahn; Delta, Colorado | 86 |
| 101 | Al Hahn; Delta, Colorado | 66, 68, 136 |
| 102 | Diane Kelly; Evergreen, Colorado | 68, 136 |
| 103 | L. Yael Stein; Gunnison, Colorado | 68, 136 |
| 104 | Peter Schertz; Gardner, Colorado | 68, 136 |
| 105 | Mark W. Hamrick; Boulder, Colorado | 68 |
| 106 | Carl Will; Gardner, Colorado | 68, 136 |
| 107 | Suzanne Fairchild; Arvada, Colorado | 68, 69, 136 |
| 108 | Thomas Keyes; Denver, Colorado | 68, 136 |
| 109 | David Rubin; Lynnfield, Massachusetts | 68, 136 |
| 110 | Betty Nickerson Elwell; LaVeta, Colorado | 68, 69, 136 |
| 111 | Dale Hall and Rod Hall, Jr.; Olathe Colorado | 86 |
| 112 | M. Thomas Gore, D.V.M.; Delta, Colorado | 65, 67, 136 |
| 113 | Gerd Von Glinsk; Eldorado Springs, Colorado | 68, 136 |
| 114 | J. Zevalking; NO ADDRESS AVAILABLE | 68, 136 |
| 115 | Lynda Poff; Phillipsburg, New Jersey | 68, 136 |
| 116 | Marc Kriewaldt; Boulder, Colorado | 68, 136 |
| 117 | Jessica Wachtel; Boulder, Colorado | 68, 136 |
| 118 | David W. Ownby; Boulder, Colorado | 68, 136 |
| 119 | Penelope Crocker; Grand Junction, Colorado | 68, 69, 136 |
| 120 | Margot Smit; Denver, Colorado | 68, 136 |
| 121 | S.J. Clark; Niwot, Colorado | 68, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|---|----------------------|
| 122 | Scott Hatfield; Boulder, Colorado | 68, 69, 136 |
| 123 | Scott Robinson; Boulder, Colorado | 68, 69, 136 |
| 124 | Gary W. Cooper; Montrose, Colorado | 86 |
| 125 | Gary W. Cooper; Montrose, Colorado | 66, 68, 136 |
| 126 | Laurie Thayer; Boulder, Colorado | 68, 136 |
| 127 | Sarah Crum; Collbran, Colorado | 68, 136 |
| 128 | Dave Hamilton; LaVeta, Colorado | 68, 69, 136 |
| 129 | Henry G. Wright; Durango, Colorado | 68, 129, 136 |
| 130 | Eric Reische; Boulder, Colorado | 68, 69, 136 |
| 131 | Kerry Whitford; Boulder, Colorado | 68, 136 |
| 132 | Margaret Orjias; Olathe, Colorado | 68, 136 |
| 133 | Karla Tschoepe; Paonia, Colorado | 68, 136 |
| 134 | Karla Tschoepe; Paonia, Colorado | 86 |
| 135 | Eleanor Von Barga; Denver, Colorado | 67, 68, 85, 122, 136 |
| 136 | Rodney Wilson; Cortez, Colorado | 68, 69, 136 |
| 137 | Patrick Muckleroy; Gunnison, Colorado | 68, 136 |
| 138 | Michael G. Figgs; Boulder, Colorado | 136 |
| 139 | Kale and Shirley Deutsch; Delta, Colorado | 66, 68, 136 |
| 140 | Kale and Shirley Deutsch; Delta, Colorado | 86 |
| 141 | Melvin K. Beach; Delta, Colorado | 86 |
| 142 | Melvin K. Beach; Delta, Colorado | 66, 68, 136 |
| 143 | Myles Standish et al.; Olathe, Colorado | 66, 68, 136 |
| 144 | Myles Standish et al.; Olathe, Colorado | 86 |
| 145 | Michael G. Goodman et al.; Olathe, Colorado | 66, 68, 136 |
| 146 | Michael G. Goodman et al.; Olathe, Colorado | 86 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|--|------------------------------------|
| 147 | Bill Campbell; Delta, Colorado | 64, 68, 136 |
| 148 | Wanda and Larry Boyd; Delta, Colorado | 86, 121, 136 |
| 149 | Wanda and Larry Boyd; Delta, Colorado | 68, 136 |
| 150 | Lew and Margene Oswald; Broomfield, Colorado | 66, 68, 136 |
| 151 | Lew and Margene Oswald; Broomfield, Colorado | 86 |
| 152 | Harry B. Vaughan; Cedaredge, Colorado | 9, 66, 68, 121, 136 |
| 153 | Laura and Ray Wynfield; Lafayette, Colorado | 68, 69, 136 |
| 154 | Lorna F. Orth et al.; Olathe, Colorado | 86 |
| 155 | Lorna F. Orth et al.; Olathe, Colorado | 68, 136 |
| 156 | Jack Musser; Delta, Colorado | 65, 98, 121, 133, 134 |
| 157 | Bernice Musser; Delta, Colorado | |
| 158 | Lawrence A. Papp; Parker, Colorado | 68, 69, 136 |
| 159 | Applehanz Brothers et al.; Montrose, Colorado | 86 |
| 160 | Richard W. and Deborah R. Gore; Olathe, Colorado | 68, 136 |
| 161 | Richard W. and Deborah R. Gore; Olathe, Colorado | 67, 69, 86, 98, 111, 117, 121 |
| 162 | Lee and Helen Tunget; Olathe, Colorado | 68, 136 |
| 163 | Susan S. Martin, Ph.D.; Fort Collins, Colorado | 27, 28, 67, 68, 103, 116, 119, 136 |
| 164 | Josephine M. Gore; Delta, Colorado | 111, 121, 136 |
| 165 | Danni L. Langdon; Grand Junction, Colorado | 67, 68, 69, 71, 126, 136 |
| 166 | Susan Detweiler; Boulder, Colorado | 68, 69, 136 |
| 167 | Bella Conner; Grand Junction, Colorado | 68, 69, 136 |
| 168 | Carl E. Conner; Grand Junction, Colorado | 68, 69, 71, 126, 136 |

REVIEW OF THE DRAFT RMP/EIS

Table 2 (continued)

| COMMENT LETTER NUMBER | COMMENTER | RESPONSE NUMBER |
|-----------------------|---|--------------------------------|
| 169 | Myrna P. Steinkamp, Ph.D.; Fort Collins, Colorado | 27, 67, 68, 100, 116, 119, 136 |
| 170 | Bryan R. Jones; Boulder, Colorado | 68, 136 |
| 171 | Lewis McCool; Durango, Colorado | 68, 136 |
| 172 | Kathy Hands; Boulder, Colorado | 67, 68, 69, 85, 110, 136 |
| 173 | Anne Ellegood; Boulder, Colorado | 68, 136 |

HEARING TRANSCRIPTS AND WRITTEN COMMENTS

All of the public testimony in the hearing transcripts and all of the written comments are reproduced in this section. The alphanumeric (H-1, L-1, M-1, etc.) and the numerals (1, 2, 3, etc.) appearing in the upper right corner of each page of the transcripts and written comments identify the commenter (see Table 1 and Table 2). Speakers at the public hearing in Hotchkiss are identified as "H" alphanumerics,

with speakers at Lakewood being "L" and at Montrose being "M". These alphanumeric and numerals are also referenced in the comment response section.

The numbers in the margins of the reproduced transcripts and written comments are comment response numbers. The BLM's responses to concerns and questions are identified by these numbers. Many of the comment responses address common concerns and questions raised by several commenters. The comment responses are presented in the next section of this document.

PUBLIC HEARING TO RECEIVE INFORMATION AND COMMENTS ON THE ADEQUACY OF THE DRAFT UNCOMPAHGRE BASIN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, AND THE ACCOMPANYING WILDERNESS TECHNICAL SUPPLEMENT

HOTCHKISS MEMORIAL HALL

September 22, 1987

7:35 P.M.

JOHN SINGLAUS, PRESIDING OFFICER



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Thank you for your attention.

JOHN SINGLAUS: Thank you, Gene.

I'd like to apologize in advance for mispronouncing your names, I know I'll do that when I go through here. Please bear with me. Are there any elected representatives or officials of Federal, State or Local agencies who wish to testify at the hearing.

L. T. MANGUM, City of Delta, would you like to speak, sir?

L. T. MANGUM: Yes.

JOHN SINGLAUS: If you could please step up to the podium, and state your name, address and who you represent, it would be helpful to us.

L. T. MANGUM: I'm L. T. Mangum, Mayor of the City of Delta.

As you refer to in your draft of June '87 of the Uncompahgre Basin and Wilderness Technical Supplement, the City of Delta does have some water rights in the Gunnison Gorge, and I would just like to say that we have been working with Congressman Ben Nighthorse Cambell's group to resolve some problems of our water rights in that canyon to try to make it into a national park instead of a national monument. This does not address what they plan to do with the City of Delta's water rights. And we happen to know that they are valid water rights, and we don't think that

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you can do some of these things that you are proposing to do here until you mitigate the question of what you propose to do with our water rights.

I believe you said that this wasn't a question and answer, just to take information. Well, that's the information I wanted to get to you.

JOHN SINGLAUS: Thank you, sir.

Any clarification needed?

We will proceed now to the list of speakers.

W. N. Brunner.

W. N. BRUNNER: I'm Bill Brunner, I represent myself and also I'm a member of WSENC.

Generally this document is perhaps admirable in its intent, but falls short in substance. It offers practically zero data to back up substantive statements or conclusions. The economic impacts are glossed over to the point of practically being ignored. Recommendations are being made here to increase tremendously the impact of our public land with no discussion of values, and particularly no data presented to support BLM's position.

The discussions of resource locations is vague.

Areas to be impacted by forest harvesting and mineral mining are not indicated individually on any of the maps in here, they are just referred to as so many acres impacted, and it's kind of left at that. I don't think that's

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sufficient.

The maps in the back here that show what will happen to areas as far as off-road vehicle activity are concerned shows that an area is closed either seasonally, permanently or limited only to existing roads and trails. I mean, that covers a broad scope and it should be broken down where it shows what areas are closed seasonally, what areas are limited to roads and trails, and what areas are closed permanently. They're vastly different categories, and they are all lumped together in one little map.

It presents very little data to base any conclusions as to impacts of implementing off-road vehicle use for most of the management area, which will happen under this plan.

It fails to identify on map or text the location of Storm King Ski area, it offers no data other than some little chart with some supposed numbers of skiers that will ski there that increases from some million now to a few million more in a few years. There's no attribution made as to where this data came from, or any discussion of the area really beyond that.

It makes optimistic assumptions about allowable increases in grazing. It gives sketchy data on only a very few grazing allotments specifically, and on the ones that are discussed in the plan here, it talks about how they are

1 in pretty bad shape, or under a lot of pressure from either
2 livestock or wildlife. It yet goes on to come up with these
3 really optimistic ideas about how such grazing is going to
4 increase over the district with very little real data on
5 it. There's hardly any data in the whole thing. That's
6 why I made comment that there's not enough in here for a
7 person to look at it and really be able to make an informed
8 decision.

9 And if you look at -- well, when the Forest Service
10 puts out a document under the same mandate from Congress
11 under the National Federal Land Management Policy Act, it's
12 full of data. Some of it they make up, some of it's wrong,
13 some of it's right, but they have data in there. And if you
14 compare this plan to the OSMU Forest Plan, there's a vast
15 difference. It's apparent to anybody who takes a half an
16 hour to sit down and go through it, they will see a lot of
17 difference. There's a lot of data developed by the Forest
18 Service.

19 I've looked at the plans for the Grand Junction
20 District and for the San Miguel San Juan District, and they
21 have lots of data in there. They don't have as much as the
22 Forest Service puts in, but they have a lot more than this
23 document has.

24 And even with the amount of data that the Forest
25 Service put out in the OSMU plan, that plan is under remand

1 right now because they didn't have enough data in there to
2 support their management decisions. And it's a big waste
3 of money for a Government agency to go through a process as
4 costly and time consuming, and takes as much energy as from
5 the people who put it together as this takes and let it
6 fall into a situation where it's not going to satisfy hardly
7 anybody because there isn't enough data in it to support
8 what you're trying to do.

9 The plan describes the wilderness characteristic
10 of three wilderness areas in the district, and then doesn't
11 recommend two of them for wilderness designation. And it
12 did not explain to my satisfaction why Camel Back and the
13 Adobe Badlands are dropped from being proposed as a wilder-
14 ness area without really saying why.

15 Something that I kind of wonder about is that there
16 appears that there's going to be a lot more off-road
17 recreational vehicle use here and there is really no dis-
18 cussion of why. And opening up to that, if there's a --
19 it's planned to degrade the environment to where a lot of
20 places, under the classification system, I think it goes
21 under class three, and a definition of class three is where
22 you look at that landscape, the things you notice is how
23 it's torn up and, you know, why are you planning to change
24 to landscape like that. What benefits are going to come to
25 the people of this area, or the government, or whoever the

1 land is administered for by making those changes. It's not
2 spelled out. It's not said why you're doing that.

3 JOHN SINGLAUB: Could you wrap it up, Bill, your
4 five minutes are up.

5 W. N. BRUNNER: I'll try.

6 A couple of things that I would recommend under
7 land acquisition is that there currently is no public access
8 for a take out point at the confluence of the Gunnison and
9 the North Fork. When you come down the Gunnison River with
10 any kind of flow at all you have to flow downstream to a
11 point that you take out on private property. And I've been
12 threatened with loss of access to take out there, free
13 access, I have to pay to take my boat out there. And the
14 same thing down at Drysdale Flats, down by Avustin. There's
15 people that have been taking out in these places for a long
16 time, and I wish the BLM would come up with some public
17 access at that point.

18 And there is also a trail that comes down to within
19 20 feet of the Escalante Canyon Road out of the Dominguez
20 Canyon wilderness area. That wilderness area is administered
21 by the Grand Junction District, but there's 20 feet of
22 private land between the road and the wilderness area that's
23 administered by this district. And because that 20 feet of
24 land is privately owned, people cannot get to that trail.
25 And I think that the BLM should make a sincere effort to

1 acquire an easement to get people into that trail, which is
2 the only access to this end of that wilderness area.

3 And I'll have to say the rest in written comment.

4 JOHN SINGLAUB: Just for clarification. John
5 Singlaub, BLM.

6 That's the McCarty trail?

7 W. N. BRUNNER: Which is probably -- there is
8 criteria given for acquisition here in either a national
9 historic or scenic trail, which is one of the things that
10 classifies land or access available for acquisition by the
11 BLM. It would also fit under two or three other classifica-
12 tions given in that area.

13 There is no criteria given for disposal of public
14 lands in this plan, either, though many are marked for
15 disposal.

16 JOHN SINGLAUB: Can you clarify for the record
17 what WHERC stands for?

18 W. N. BRUNNER: Western Slope Energy Resources
19 Center.

20 JOHN SINGLAUB: Thank you.

21 Mark Malah.

22 GENE VECCHIA: John, could I ask a question for
23 clarification.

24 JOHN SINGLAUB: Sure.

25 GENE VECCHIA: Did I hear you say that under the

1 preferred alternative there was more, we're opening up more
2 use to ORV use than is current, did you say that?

3 W. N. BRUNNER: I believe that's what's going to
4 happen. It says here in the Chapter 3, preferred alterna-
5 tive, off-road vehicle use on public lands will be open to
6 ORV use.

7 JOHN SIGNLAUS: Go ahead.

8 MARK WELSH: My name is Mark Welsh, I live up on
9 the Redlands outside of Hotchkiss.

10 I will try to just give a quick summary of my
11 views of this document and not get into a page by page
12 analysis.

13 Not too many years ago I remember reading the
14 notice that came out from the Montrose Office of the BLM
15 saying that they were going to do an RMP. It's a little
16 peculiar that the first time we legally asked for one and
17 legally challenged the BLM to have one that that was eleven
18 years ago, but I understand how things take time. Unfor-
19 tunately I think that that time has not been spent well
20 when the BLM and when the team leader talked earlier about
21 what this plan did and it's methodology. It certainly gave
22 the impression that any conflicts between water and water
23 right and coal mining were taken care of.

24 I've gone through this plan. I've read most of
25 it and to me it was not evident that this has been done.

1 water supplies.

2 Well, we live in a desert here, everybody knows
3 that. But for some reason the decisions made say, just as
4 one example, the goals in this document are out of line, I
5 believe, as far as water users are concerned.

6 In the past there have been very good decisions
7 made by the Bureau of Land Management, there was a con-
8 sensus worked out with ditch people, the coal industry and
9 the BLM and environmentalists in the past to try to resolve
10 some of these issues. None of the past controversies in-
11 volving development in this area are evident, either in
12 the methodology in this document, or in the decisions. And
13 I would strongly urge the BLM to take a oact, unlike the
14 Forest Service and sit down with all of the users and try
15 to not only improve their document, but to come up with
16 management decisions that recognize the real resource con-
17 flicts and the competition that we all have on how do we
18 want the public lands to take care of us. That has not been
19 done in the past.

20 On the last two land use plans that have come out
21 of this area have resulted in legal challenges, and I think
22 by now the BLM should learn that there's a different way
23 to do business, and by trying to save paper here, by leaving
24 out information, detracts from the purpose of the document.
25 I can't tell how I'm going to be affected. My neighbors

13

1 But in general there are two problems with this
2 plan, one has to do with its methodology. Is the plan,
3 does the plan do what its supposed to do.

4 The second problem is how does it manage the
5 resources. Now, you have got coal miners, you've got loggers,
6 you've got hunters, you've got a wide variety of users and
7 we all want ou use to be number one. But I think quite
8 a while ago we realized there is a way to work out a con-
9 sensus, there's a way to compromise and there's a way to
10 fight for what you have. And unfortunately I see this doc-
11 ument overemphasizing resource development, and I think that
12 that would be to the detriment of Delta County and to the
13 detriment to the industry that's here and the residents
14 that are here, and particularly would affect the water
15 users.

16 And I'd like to go to a couple of items in this
17 document having to do with water. The mining of coal and
18 locatable minerals could result in the permanent, irrevers-
19 ible loss of ground water through diversion and subsidence,
20 page 4-6f.

21 And over in the fourth chapter, fracturing and
22 subsidence of rock strata from underground mining could
23 decrease the quantity and quality of groundwater, loss of
24 either surface or groundwater could impact adjudicated
25 water rights and diminish local domestic and agricultural

13

1 can't tell how they are going to be affected, and the
2 manager in the BLM can't get very good guidance here, or
3 determine what the impacts of his choice between the alter-
4 natives.

5 My last comment goes to looking at the different
6 alternatives that are here, and we could all get cross
7 eyed looking at the small print. But there are a number of
8 different alternatives.

9 The preferred alternative; the conservation alter-
10 native, which means hardly do anything; the production
11 alternative, which means let's do the most; versus what we
12 are doing right now. So we have got four alternatives.

42

13 Under just one resource, which is coal, they are
14 almost all the same. They are off by a couple of acres.
15 And you can go through this and see that there really isn't
16 that much choice.

17 So, again, I don't want to go into any more detail
18 on the documents, but I would strongly encourage the BLM
19 to set up a non-adversarial process with all of the public
20 land users to try to come up with a better plan for our
21 valley.

22 JOHN SIGNLAUS: Thank you, Mark.

23 David Johnston.

24 DAVID JOHNSTON: I'm David Johnston from Paoline,
25 I'm speaking for myself.

I want to talk mainly about wilderness. First I wanted to congratulate the BLM on their recommendation on the Gunnison Gorge as a wilderness area. I've been through it and I think everybody, or almost everybody in the county thinks that it's a great place and should be a wilderness area. We also think that it should be a wild and scenic river. I know the BLM has recommended that and can't get it through Congress. I think that's well and that should be encouraged and the BLM should be applauded for making that recommendation. I think it's a very worthwhile place to be wilderness.

As to the Camel Back, I haven't been in that area, but I've talked to people who have been there and I've read some of the documents on it. It seems there's very little conflict with any uses of the area, and I would like to see the Camel Back also designated as wilderness.

I have been through the Adobe Badlands, and I think it's a big mistake not to designate that area as wilderness. I'd like to read a quote kind of buried in your document, but with this recognition I don't see how it cannot be labeled recommended as wilderness.

On page 3-11 it states "Geologically, the Adobe Badlands WSA is highly varied and diversified. The majority of the WSA consists of badland-type formations, or "adobe" hills, where coloration changes abruptly with shifts in

lighting. The upper portion of the Adobe Badlands is rolling, rugged, pinyon-juniper foothills cut by numerous, small drainages. Human imprints are minor."

Skipping down a little bit. "The Adobe Badlands WSA provides many opportunities for solitude. The maze-like Badlands and upper pinyon-juniper vegetation effectively screen visitors and foster a feeling of intimacy. The sloping topography affords sweeping views of the lower Badlands as well as Grand Mesa, the Uncompahgre Plateau, and the San Juan Mountains which stimulate feelings of solitude and remoteness."

"The topography of the Adobe Badlands offers outstanding opportunities for primitive and unconfined recreation. The upper woodland areas provide excellent hunting. The WSA affords yearlong opportunities for hiking, horse-back riding, photography, and sightseeing."

I might also add it has interesting names, it's kind of like a neurotic trip through hell. You start off right below Hell's Hole and go right down between Devil's Thumb and Susie's Tit. And it's a real interesting place, you get out in the middle of it and you're just miles away from everywhere.

Modern language has two meanings for bad; one is bad is not good, and the other is bad that it's real good. And I think this place is bad, and I think it should be

designated wilderness. Thanks.

JOHN SINGLAUS: Thank you.

John B. Benjamin.

JOHN B. BENJAMIN: Good evening, I'm John Benjamin from up on Redlands Mesa, 1991 2900 Road, it used to be Route 2. That's the kind of way things change. I think.

But I'm talking today as an individual, as a fisherman, boatman, small farmer, real estate tycoon, conservationist and taxpayer.

So my first question as a taxpayer is how many people here tonight are getting paid to be here by us taxpayers? You guys don't get paid to come, that's great. That's interesting. I know the Commissioners don't get paid. I know I don't get paid, that's one of the problems I have with being here, I don't get paid. Although my boss did give me a \$5 a day raise here, he's Hank Motze, over there. I run boats for him periodically, so I'm going to pretty much keep my -- he's not paying me to be here tonight but he might buy me a beer later on. But I'm going to keep my comments pretty much to the river and gorge.

Once again I concur with David over there, that you should be recommended, you would have been lynched if you hadn't, but you should be recommended, or commended, for making the gorge a wilderness, or suggesting that the gorge become a wilderness area.

As a conservationist I also think that the conservation alternative there should be followed, that's my preference.

I think all three WSA's are unique and valid merit and only represent, what, less than ten percent of your total plan mass here that you have taken charge of.

So I like them all, but I like the gorge the best, and I like the gorge the best because I have been down there for the last six years running that thing for Hank and know it well. I probably know it better than most people in the room, except for Hank.

I want to make a few recommendations about special management down there. I know that the BLM, and one of the only problems I have with the BLM taking it over as a wilderness area and the BLM managing it as a wilderness area is the BLM is notoriously short of funds for management. And I know this summer, for instance, they only had one person down there pretty much full-time, well, not even full-time. It's been tough to keep track of what's going on down there. The resource has been really trashed out. Anyone who has been down there lately, and Hank knows, and, of course, Caleb, it's really trashed out.

I think rather than to have voluntary regulations in effect down there as far as low impact coming go, they cannot be voluntary, but they must be mandatory. And what

1 they must be, they must be no wood burning, they must be
2 fire pen used. They must use portable stoves, you know,
3 you can't --

4 Portapotties are a must, ladies and gentlemen, in
5 this modern day and age in the river. It's such a fragile
6 environment down there. You've got to pack everything out
7 that you pack in, including your own trash and human waste.

8 I would also recommend, and I might have some
9 frowns from certain sectors in the room on this one, but
10 both the trail to Chuckar and Duncan should probably be --
11 the trail heads should be moved back further from the rim
12 and that would weed out a few people that are abusing the
13 area around there, and hopefully keep the wilderness values
14 intact that are now being trashed out.

15 That's about it, thank you.

16 JOHN SINGLAUB: Thank you, John.

17 Caleb Gates.

18 JON SERING: Jon Sering again, if I would ask a
19 clarifying question.

20 JOHN B. BENJAMIN: Yes.

21 JON SERING: You said that Chuckar and Duncan
22 should be moved back further from the rim, do you mean --

23 JOHN B. BENJAMIN: The vehicle access.

24 JON SERING: Further from the, move the trail
25 head back so it's further from the river?

1 perspective used in putting or organizing data. I kind of
2 think that less grazing you're going to have less erosion,
3 less salinity, and you're going to have to do less corrective
4 measures.

5 Throughout the book you're talking about corrective
6 measures in channels, meaning river channels, to
7 correct salinity problems. I think if you have smart land
8 use and prevent these things from happening that you are
9 not going to have to spend ten times the amount of money
10 to correct them. And I don't think I see enough of that
11 in the book.

12 Such as off-road vehicle use in the Peach Valley,
13 that has some of the highest total dissolved salt concentra-
14 tate, and that off-road vehicle use seems pretty high as
15 that is planned. And I think that that should be less than
16 those highly sensitive areas.

17 And then, lastly, I would like to see legislation
18 enacted sometime and somewhere where the BLM can have
19 enforcement to write citations and help keep the Gunnison
20 Gorge recreation area clean and to force private river-
21 runners to have -- to act as commercial ones and carry out
22 their garbage.

23 Thank you.

24 JOHN SINGLAUB: Thank you.

25 Stephen F. Hinchman. If you can spell your last

1 JOHN B. BENJAMIN: Yes. So it gives you that much
2 more of a buffer area and keeps vehicles from approaching
3 as close as they can now.

4 JON SERING: Okay. I just want to clarify, meaning
5 the trail -- you're just making the trail further from
6 the river, not from the rim? Closer to the rim rather than
7 further?

8 JOHN B. BENJAMIN: I would like to make it so
9 it's a longer hike in.

10 JON SERING: Okay. Thank you.

11 JOHN SINGLAUB: Caleb Gates.

12 CALEB GATES: I'm Caleb Gates, I'm representing
13 myself and river runners. I raft for Gunnison River Expe-
14 ditions and I live in Paonia.

15 Some of my concerns -- first of all, I'm glad that
16 the Gunnison Gorge is recommended for wilderness, but I think
17 with the huge acreage that is also upper management plan,
18 that the Camel Back and Adobe Badlands areas should be
19 recommended.

20 The Camel Back offers a full opportunity for
21 solitude, and the Adobe Badlands which are, as I read,
22 highly erodible and not really suitable for grazing, would
23 probably be best as a wilderness area. They are not off-
24 road vehicle or grazing areas.

25 And then I got some concerns on just some of the

1 name, it's kind of blurred here on our sheet.

2 STEPHEN F. HINCHMAN: H-i-n-c-h-m-a-n.

3 JOHN SINGLAUB: Thank you.

4 STEPHEN F. HINCHMAN: My name is Stephen Hinchman,
5 and I live in Paonia, I have been here about a year now in
6 the valley, my work brought me here, but if it didn't, I
7 would visit it anyway. Not to visit the communities of
8 Delta or Montrose, but to come to the many wild areas that
9 we have in our counties here.

10 I'm going to speak about the Camel Back wilderness
11 area. You sent your experts in the past couple of years to
12 evaluate the area's suitability for wilderness designation.

13 Well, the comments in your little book here, they
14 found the Camel Back to fit the criteria for wilderness,
15 however, the recommendation is non-suitable.

16 So I packed up the EIS and the RFP and went out
17 there myself and spent two days and nights in the Camel
18 Back to do my own study. I found the Camel Back to be more
19 than suitable, I found it delightful.

20 I hope the pictures that I took, which are up on
21 the wall back there, can make it a real place for some of
22 the people that didn't get to go out there.

23 The canyon is not the kind of place that you
24 escape from or get away from it all when you go to the
25 wilderness, it's more like the feeling of you're going to

get to it all. And the Camel Back is such a place.

I spent two nights up on the wind-whipped mesa tops, with starry nights, hard rocky bed and spectacular dawns.

The days were spent well, one meandering across Winter Mesa with its hot, parched grasses looking overgrazed to me and fatigued by invading sage. Lots of lonely piñon trees, and I took some siestas in the cool draws. Heard a hawk, but it wouldn't come close enough to identify. It's choppy, but it's flat country in the Uncompahare Plateau, even though you're up there. I enjoyed it a lot and I had a lot of alone opportunity for solitude, I could tell I was alone.

The next day was similar and quiet. From the canyon walls of Houbideau Creek, lots of ponderosa pines, willows and cottonwoods against the entreda. By this time I was thirsty, my lone quart of water down to a few sips, wondering how sick I'm going to get if I drink the water out of that creekbed. I mean, your cows in my wilderness propagating the wild Giardia. I risked it, and also stopped to swim in cold potholes.

Down here it's a little different; signs of coons, cats and deer, and the ever present cow pie.

I stopped many times to read the NHP/EIS, translating from it heavy bureaucratia into plain English. And

the wilderness qualifications that you mentioned in the book are there, indeed. There's no competing for mineral, oil and gas uses, except for a three-B uranium rating. Well, they can't even mine four-D uranium these days. There's no competition there.

The only competing uses I saw were cattle grazing, and off-road vehicles. In the Camel Back it's already overgrazed. In fact, your plans say you will reduce the grazing allotment by 200 annual unit months no matter which plan is recommended. A good rancher that watched his land wouldn't put that many cows out there in the first place.

Yet you give the cows 6,402 acres, that's the best land, that's the top of Winter Mesa. What you allow the wildlife is the upper part of the Houbideau Canyon and on Camel Back, the steep, rugged places where those cows can't get at, and if they could, your cowboys would have a hard time getting them off of there.

As far as off-road vehicles go -- anyway, I think the grazing allotment, or allotments are wrong. There is no concessions whatsoever to wildlife.

On off-road vehicles, of the entire BLM Montrose District, 92 percent is being managed for off-road vehicles, that's stated in your book here. The Camel Back at 10,000 acres out of 480,000 surface acres is one quarter of one percent, but you won't outlaw ORVs there, which you state

in the book will ruin the area's wilderness values.

You estimate the current 500 recreational visitor days to be 50 percent of ORV use, and you say managing the area for ORV use in the future will eliminate 250 primitive recreational visitor days. Well, that's all the primitive recreational visitor days. That amounts to zero primitive use of the area, people driven out by the raging six cylinder, dual carb, air polluting, earth crunching beasts. That combined with --

(Laughter.)

I had to get that one in.

But that amounts to single use, it's not the sacred multiple use verbiage that gets passed off on us all the time. It's biased, it's one sided, it's off-road vehicle use.

Granted there are restrictions, but BLM has, what, one enforcement officer in the whole area. Without enforcement, there is no real restrictions. So I throw that out.

I quote from your book. "Not designating the Camel Back WSA as wilderness would lead to a gradual decline of the wilderness values throughout the WSA, primarily as a result of increased ORV use." The impacts are to the soil, water quality, water salinity, vegetation and wildlife.

In case you forgot, when you went out there your mission was to study the suitability of the selected areas

for wilderness designation. And according to the Wilderness Act of '64, the designation is this, a wilderness, in contrast to those areas where man and his work is subjected to landscape, is hereby recognized as an area where the earth and its community of life are untrampled by man, where man himself is a visitor that does not remain. An area of wilderness is further defined to mean in the act an area of undeveloped federal land retaining the primeval character and influence without permanent improvements of human habitation subjected and managed so as to preserve its natural conditions and which generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable; has outstanding opportunities for solitude or primitive and unconfined type of recreation; has at least 5,000 acres of land, or is of sufficient size as to make practicable its preservation and use in unimpaired condition. It may also contain ecological, geological or other features of scientific, educational, scenic or historical value.

JOHN SINGLAUS: Five minutes.

CALEB GATES: Okay. I'm just going to close up.

Camel Back meets those criteria. Your recommendation of nonsuitability has no justification.

And I'll just read this one quote and leave it at that. There's a great deal of talk these days about saving

1 the environment. We must, for the environment sustains our
2 bodies, but as humans we also require support for our
3 spirits. And this is what these kinds of things provide.
4 The catalyst converts any physical location, any environment
5 if you will, into a place that is a process of experiencing
6 deeply. A place is a piece of the whole environment that
7 has been claimed by feelings. Used simply as a life support
8 system, the earth is an environment. Used as a resource it
9 sustains our humanity. The earth is a collection of places.
10 We never speak, for example, of an environment that we have
11 known, it is always places we have known and recall. We are
12 homesick for places, we are reminded of places. It's the sounds
13 and smells and sights of places which haunt us and against
14 which we often measure our presence.

15 With your resource management plan, that wilder-
16 ness is going to look like this picture here, with the off-
17 road vehicle running right through the middle of it.

18 Thank you.

19 JOHN SINGLAUB: Thank you.

20 Mark Paigen.

21 MARK PAIGEN: My name is Mark Paigen. I live in
22 Peoria and I represent myself.

23 I also guide down the Gunnison Gorge, so I've been
24 there quite a bit and I've seen it quite a bit over the last
25 four years. I guess I'll talk about that first.

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1 I think the Gunnison Gorge should be a wilderness
2 area, I think the river should be included in the wild and
3 scenic river act.

4 I think that the BLM needs to address how they are
5 going to enforce regulations on private boaters down there.
6 Commercial boaters, by their very nature, protect
7 the resource because it is their living. Private boaters,
8 or walk-in fishermen don't have that at stake and can build
9 large fires and the BLM basically can't do anything about
10 it except ask them politely not to.

11 So I think they need to have some enforcement
12 capability like the Department of Parks and Outdoor Recrea-
13 tion, which enforces the rules on commercial boaters.

14 As far as the other two wilderness study areas,
15 the Badlands and Camel Back, I feel that both of them should
16 be designated as wilderness. According to your draft plan
17 here, both of them fit the criteria. I don't see why you
18 didn't recommend them for wilderness.

19 As far as the Storm King area goes, I think that
20 you're just skirting the issue, that you're saying basically
21 for five years we won't decide either way and we will let
22 the developers go ahead and then we will kind of see what
23 happens. I don't really think that's what should be done,
24 I think a decision should be made.

25 I've heard that it's a very important calving area

1 for elk and I think those types of issues need to be
2 addressed and a decision made rather than just putting it
3 off until the developers have put so much money into it
4 that they can twist your arm and say "we've gone this far,
5 we have got to continue."

6 I guess the last thing I want to say is that
7 Delta County, Delta and Gunnison Counties are beautiful
8 areas, and in the long term the economy is going to rely on
9 that beauty more than industry, or I should say extractive
10 industry. And to look into the long term for this area is
11 to preserve the natural resources that we have in pristine
12 quality, and that wilderness will do that very well.

13 Thank you.

14 JOHN SINGLAUB: Thank you.

15 GENE VECCHIA: I have a clarifying question, Mark.
16 You kind of skirted around it, are you saying on the ski
17 area issue that the BLM should make a decision against
18 allowing the ski area --

19 MARK PAIGEN: Yes.

20 GENE VECCHIA: -- is that what you really mean?

21 MARK PAIGEN: Yes.

22 GENE VECCHIA: Okay, thank you. Good enough.

23 JOHN SINGLAUB: Thank you, Mark.

24 Gerrie Wolf.

25 GERRIE WOLF: I'm Gerrie Wolf, 706 2750 Lenc.

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1 Cedaredge, Colorado. I am speaking for myself, my husband
2 as permittee on the BLM land in 4502, which is Leroux and
3 4549 which is the Dry Creek area.

4 Our first concern is with the access proposal in
5 every one of your -- in every one of your proposals you have
6 stated that you would like to acquire access to these lands.

7 I'm also speaking as a taxpayer and multiple
8 user of that plan for recreation, for hunting, for grazing,
9 and I do like the esthetic values that I get when I go out
10 to take pictures. I do like to -- I am a photographer. And
11 I don't like the trash, and I think that people have to be
12 educated to pick up their stuff and to carry it out. If
13 they bring it in, take it out.

14 On the Dry Creek and the Soulding access proposal,
15 we feel access to those areas would be unsuitable. BLM is
16 unfenced, so that access would be to private land as well
17 as your BLM land.

18 Maintenance of the roads fall to the landowners
19 right now. The Dry Creek road, the first mile and a half is
20 used for farm machinery and falls on private land. It is
21 not surfaced. Opening the Dry Creek road into the canyon,
22 it's very narrow and would impact the riparian zone that
23 you're concerned about. It would be -- the things we noted
24 was the salinity in the Dry Creek, which is also your
25 Current Creek. On your statement it is noted the Current

1 Creek and the high salinity there. Opening up this canyon
2 would impact that.

3 If you would open up this canyon to unrestricted
4 hunting, which opens up Hells Hole from the bottom, you have
5 a very limited, there's three spots in the canyon, plus
6 what everybody else wants to open, where hunters can camp.
7 All right. There's one spot in the canyon that is over-
8 impacted because of hunting, the recreational value. I do
9 not recommend opening up that canyon, it would also have an
10 impact on the private lands.

11 Livestock grazing, we want to know -- our questions
12 there, and we are not addressing specific questions, but our
13 concerns, and on these access roads across the private
14 property, will they be surfaced, will they be fenced?
15 If somebody drives off into one of our irrigation ditches
16 is there a lawsuit.

17 And we feel, with the exception of the access,
18 we would like your present plan to remain the same, which I
19 think is proposal A. We do not feel the State needs any
20 more wilderness areas.

21 I personally have not been down in the Gunnison
22 Gorge where these young people have been. I have heard of
23 different folks going down there, fishing and so on, and
24 they enjoy it. So I can't really speak too much about the
25 Gunnison Gorge, but I do not like any more wilderness areas.

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1 It is discrimination. It discriminates against the older
2 generation. It discriminates against the handicapped, and
3 our State has an abundance of wilderness areas now.

4 And I'm getting personally to the point where I'm
5 going to retire one of these days and if I get to the point
6 where I can't ride a horse I'm going to have to hike these
7 areas, and I would like to be able to see them and enjoy
8 them. And the people who drive through these areas do not
9 cause a lot of destruction, it's the person who gets out and
10 hikes and gets into the areas where the normal person or the
11 elderly or the handicapped, the real young cannot get.

12 When I was younger I did do some of this hiking
13 into some wilderness areas, and I -- some of our environment-
14 alists are, in the days of the hippies, and it was -- they
15 did not take care of what they did.

16 I know I'm in the minority right now at this
17 meeting, but perhaps -- I think -- let me glance through
18 this and see if there's anything else that I had on there.

19 I got carried away. I think that's it. Thank
20 you.

21 JOHN SINGLAUB: Thank you.

22 Hank Notze. Did I pronounce that correctly?

23 HANK NOTZE: Yeah, that's fine.

24 (Laughter.)

25 My name is Hank Notze, and I live in Hotchkiss,

1 My Post Office Box is 604 and I'm reorganizing myself and
2 a company by the name of Gunnison River Expeditions, who
3 currently operates on the Gunnison Gorge, and its the oldest
4 licensed outfitter in the Gunnison Gorge.

5 I would like to ask a question right off the bat,
6 and that is it necessary that I make comments based on the
7 modification to the administration of the Gunnison Gorge
8 at this meeting, or will the written comments stand as my
9 comments?

10 JOHN SINGLAUB: Written comments carry the same
11 weight as verbal.

12 HANK NOTZE: So I don't have to waste everybody's
13 time with my comments.

14 JOHN SINGLAUB: Correct.

15 GENE VECCHIA: Hank, are you talking about on the
16 addition to the RAMP?

17 HANK NOTZE: Right.

18 GENE VECCHIA: That's a different document.

19 HANK NOTZE: A number of people are commenting on
20 those issues and I --

21 GENE VECCHIA: Right. Those comments can be sent
22 to Jon Seifing here at the BLM Office.

23 HANK NOTZE: Fine. To be brief, the BLM, in my
24 opinion is correct in suggesting that the Gunnison Gorge
25 be designated a wilderness area, as well as a wild and

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1 scenic river.

2 It's my perception that, based on what I've read
3 in your Wilderness Supplement to the RAMP, the Adobe Badlands
4 and the Camel Back or Houbideau also qualify for wilderness
5 designation. And those areas are currently pristine, and
6 they harbor lots of wildlife, and they are some of the best
7 things in the area. And something that people continue to
8 overlook is that those resources are finite. What we are
9 designating here, we are determining that we should destroy
10 something that can't be repaired, and these areas currently
11 are not being used commercially to any value that we know of,
12 and they should be preserved, especially in light of the
13 decline -- some of the people in this room have a vested
14 interest in these areas, and I apologize, but a fact is a
15 fact -- that the decline in agriculture, and the decline in
16 mining in the State of Colorado and the State Government's
17 direction to promote tourism and recreation. These areas
18 provide, or will provide the finest of those things. If
19 we destroy them at this point for no real reason, as you
20 have admitted in your plan, there's no real justification,
21 then those areas will be gone.

22 We are seeing a tremendous increase, I'm a guide
23 and outfitter, we are seeing a large increase in the area in
24 interests in areas such as these, and they are bringing in
25 tourist dollars. They are bringing in dollars that say,

1 They pay at the gas station and at hotels and restaurants,
2 and they're buying crafts, and they're buying fruit and they
3 leave, the people that hand out these dollars. And they
4 give the local economy a tremendous boost, and if you
5 destroyed these things you will never be able to bring them
6 back.

7 And there are lot of developed lands in Colorado,
8 and I don't think there are enough lands that aren't
9 developed.

10 Also these areas are providing, as I say, habitat
11 for animals, and you know that hunting and fishing is a very
12 large business and is growing all the time.

13 The other thing that I would -- another thing I
14 would like to mention is that Storm King, the whole issue of
15 Storm King should be brought out in the open and you all
16 should make a decision, put your foot in the bucket and let
17 us know what you're thinking, because Storm King to me --
18 I know that you can't make an economic judgment as to the
19 potential benefit of a ski area to an area, but there are
20 a lot of ski areas around the State that aren't doing well
21 at all and that have destroyed some prime habitat and some
22 beautiful acreage for the guess that there will be a
23 tremendous future in skiing. And I believe that the Storm
24 King is the same because of the competition that they are
25 dealing with: Telluride, Crested Butte, the Aspen complex.

1 You read in the paper all the time about Powderhorn,
2 Powderhorn is dying on the vine, it's another mistake.
3 Storm King will be another mistake.

4 The only other thing that I have to say is that
5 as you make these designations, and as you make these
6 suggestions, that BLM has got to take responsibility for
7 enforcement. I know that you have an enforcement person,
8 or maybe two, but that's not enough. There has to be money
9 in the budget every year allocated to enforcement to main-
10 tain the integrity of these lands.

11 My other point is that some of these areas need
12 maintenance, and you all -- especially in the Gunnison Gorge,
13 that seems to be depending on the outfitters to maintain
14 the place, and the outfitters have been maintaining it for
15 a long time. But the BLM really has the responsibility.
16 We are paying our taxes, and we are paying user fees and
17 expecting BLM to take that responsibility.

18 So, thanks for the opportunity to comment here
19 tonight.

20 JOHN SINCLAUS: Thank you, Hank.

21 JIM FERGUSON: My enforcement, do you mean by
22 citation type enforcement, or someone like the individual
23 that we have had working there this summer?

24 HANK HOTIE: They have to have that dual capacity.
25 It's a management emphasis that really should be oriented

1 towards education first and enforcement second. But they
2 should have the dual capability.

3 JIM FERGUSON: You're thinking then of citations
4 and --

5 HANK HOTIE: That would be the most efficient
6 thing, to have somebody that could do both of those. Then
7 you wouldn't have a couple, three or four people on the
8 payroll, some doing some and some doing the other. Educa-
9 tion is the key, but it hasn't worked so far.

10 JIM FERGUSON: Thank you.

11 JOHN SINCLAUS: Thank you.

12 Robin Nicholoff.

13 ROBIN NICHOLOFF: My name is Robin, R-o-b-i-n,
14 Nicholoff, N-i-c-h-o-l-o-f-f. I'm speaking for myself and
15 my family.

16 I thank you for the opportunity to comment on this
17 draft EIS for the Uncompahgre Basin Resource Management Plan.

18 The first problem I encountered in reading this
19 document was the extreme general approach to all resources,
20 both in their description and management options, impacts
21 and possible mitigation measures. I find it difficult to
22 comment specifically on something that is so broad brushed
23 in nature and which offers so little in way of detailed
24 analysis.

25 For example, I refer to the Uncompahgre Basin

1 resource area grazing EIS of 1978, which offered very
2 specific conditions under which, for instance, the practice
3 of chaining could occur.

4 Similarly you went to the Southwest Utah coal
5 region REIS, it offers specific exclusions of areas of coal
6 development, detailed mitigation measures, etc.

7 More recently the RAMP for the Gunnison Gorge
8 gives the public precise conditions for the Gunnison Gorge --
9 excuse me, precise conditions that would result in, for
10 example, the reduction of the number of commercial float
11 trips through the Gunnison Gorge. And I would like to
12 commend the BLM at this point for their analysis that was
13 done in that RAMP.

14 This document, however, is totally lacking in such
15 specificity, and consequently is probably in violation of
16 the Federal Land Policy Management Act of 1976.

17 Nonetheless, I offer a few observations which I'll
18 try to keep brief. I'm concerned with the manner in which
19 public access would be required into various areas, specifi-
20 cally the Roctap and Jay Creek area. The EIS does not
21 indicate any consultation with private landowners. That
22 leaves to a lot of questions. Will the acquisition be
23 through purchase of rights of way or through condemnation.
24 Once said rights of way are acquired, will the BLM be
25 responsible for maintenance of them. Will BLM indicate

1 which lands are private and which are public. Now will
2 restrictions of off-road vehicle use be enforced. The ELM
3 personnel apparently have no citation authority, which makes
4 enforcement extremely questionable.

5 On a right-of-way that passes through private
6 land and accesses a public land, will BLM install culverts
7 and other devices to control erosion and sediment loading
8 of riparian zones.

9 These questions and others naturally occur in the
10 minds of the public while reading this EIS.

11 The environmental impact invasiveness actions are
12 simply not addressed.

13 I'm concerned with BLM's ability to follow its
14 own regulations and constraints placed upon it by this and
15 supporting documents. For example, the aforementioned
16 grazing EIS states on page 1-39 that "equipment would
17 reach the job site over existing roads or trails." And
18 this is with regard to chaining and reseeding projects.

19 On page 1-24 it states "neither temporary or
20 permanent trails will be constructed to fence sites, water
21 developments, or vegetation conversion sites." And conver-
22 sion sites include chaining.

23 The grazing EIS calls for fencing the south
24 boundary of Roostcap/Jay Creek allotments, and for water
25 projects to occur prior to vegetative manipulation, yet

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1 all of these and other specifications were violated when
2 on September 19, 1982, bulldozers under contract to the
3 Bureau of Land Management trespassed on that private land
4 to begin implementation of the Wolf Park chainings project.

5 Page 4-5 of the Grazing EIS states that "if
6 modifications are needed into existing AMPs, an environmental
7 assessment report would be completed prior to implementation."
8 Several days after site work had been done on the Wolf Park
9 chainings, the BLM District Manager issued a NEPA categori-
10 cal exclusion in flagrant violation of Federal law and
11 agency recommendations or regulations.

12 I wish that you not misunderstand me, I'm not
13 opposed to livestock grazing on public lands, nor to impos-
14 ing to improving grazing conditions for wildlife and livestock.
15 I'm opposed to establishing regulations and procedures,
16 priorities and plans for implementation of objectives, and
17 turning around 180 degrees and not following them.

18 I point to that older document as a -- well, for
19 obvious reasons, but partly in contrast to this current
20 document. I feel that the EIS is inadequate in its laying
21 out to the public what the agency wishes to do, how it will
22 do it and the impacts, either positive or negative, of
23 doing it.

24 Briefly on just a couple of other points, I can
25 find no justification for not including the Camel Back and

1 Adobe Badlands wilderness study areas for not recommending
2 inclusion in the wilderness system.

3 I'm concerned with inadequate monitoring of oil
4 and gas activities, particular in the Muddy Creek area.
5 There have been instances of oil slicks in the Paoia
6 Reservoir and pollution has occurred to West Muddy Creek
7 from oil and gas operations. There has also been illegal
8 dumping of production water from oil and gas activity in
9 the Peach Valley area, resulting in pollution of irrigation
10 ditches.

11 On the Storm King ski area with the U.S. Forest
12 Service's --

13 JOHN SINGLAUB: Five minutes.

14 ROBIN NICHOLOFF: Pardon?

15 JOHN SINGLAUB: Five minutes.

16 ROBIN NICHOLOFF: The U. S. Forest Service recently

17 approved two new areas near Pagosa Springs, we are looking
18 at the expansion of the Vail ski area by 50 percent,
19 Powderhorn is expanding. There are many for sale signs at
20 ski areas around Colorado. I just wonder, do we really need
21 another ski area, specifically one that may impact critical
22 elk habitat.

23 I guess since my time is up I'll defer other
24 comments to written form. Thank you.

25 JOHN SINGLAUB: Thank you.

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1 John Green.

2 JOHN GROOMER: It's Groomer, G-r-o-o-m-e-r?

3 JOHN SINGLAUB: I guess it is. I'm sorry, did
4 you catch my apology at the beginning.

5 JOHN GROOMER: That's hard to read.

6 My name is John Groomer and I live at Paoia, and
7 I would like to comment on three things.

8 First of all, I'd like to say thank you to the
9 BLM for their wilderness designation for the Gumption Gorge.
10 I think it needs it. I think also the Camel Back and the
11 Adobe Badlands meet all the criteria for wilderness.
12 Wilderness is a diminishing resource within this country,
13 and we need to preserve all that we can.

14 And I'll make my comments very brief. As far as
15 the Storm King ski area site, I cannot believe that the
16 BLM proposes a five year grace period in which developers
17 may proceed with the ski area, after which the BLM might not
18 allow them to develop. I mean, if you know anything about
19 the way big business operates and money speaks, if the
20 developer puts millions of dollars into an area over a five-
21 year period, there is no way that the BLM will say no to the
22 Storm King ski area.

23 Thank you very much.

24 JOHN SINGLAUB: Thank you, John.

25 Jerry Price.

JERRY PRICE: I won't take too much of your time. Jerry Price, Poonis, Colorado, I represent Whistling Acres Ranch.

I deal with a lot of things that we are talking about; we graze cattle, we raise crops, we hunt, we take people on off-road ventures, we do it all in the area, some of the area we are talking about.

A couple of things I wanted to comment on. Your access program has been brought up before, we have two and a half miles of access across our public lands to get to a few hundred acres of BLM. We pick up bushels of trash: beer bottles, cans, paper. We have deer shot right out in front of paying hunters, people that stop on your access road across our land and shoot them.

As far as our grazing, we do a lot of erosion control, we put in ponds that stop some of this erosion that people are complaining about that grazing causes. We seed. We chain. We put up fences. And we pay a fair amount of money to put those cattle on that land. All we read is articles about we get free grazing. I've put over \$3,000 worth of my men's wages into taking care of a few hundred acres of BLM that I cross in three days and come back in two days.

We put in those same water ponds and the elk and deer that I make money off of my outfitting license and

having hunters come in, all those elk and those deer graze off from it. Drink out of those ponds. Down to my hay field and eat my hay.

And I know the Department of Wildlife says some of these people for that, but I like good, fat deer and elk to shoot in the fall, so we don't bother to put in to have them pay us back.

So I just think that a lot of people stand us here and say I've got nine, I want to stop everybody else from getting theirs, whether it be a conservationist, a rancher, a hunter, or who it is. Because we see something that we think we want is not a reason that we should shut out everybody else. I think we can work together.

We put some trails through these areas that maybe the term off-road vehicles isn't right, let's put a trail in that area that a vehicle should follow, let's make it a trail vehicle, whatever its classification might be.

The lady addressed us here a little while ago finds it very difficult to walk and go clear down into these areas that might be designated wilderness. I'm all for wilderness, I get clear out in the middle of it on horseback and have some of the same feelings the other gentlemen do.

However, sometimes when I find one of them taking their cool dip in the nice cold pocket of water, it makes my wife feel a little funny when they are guys and it makes

me feel kind of funny when they're women because they're not quite alone out there as they think they are. Most of them don't carry swimming suits.

I've rode my horse into campfires that some of these backpackers have put out there and they find out that they can carry a 16 ounce can of something out to the field, but they can't carry a 2 ounce can back.

I had to pay a permit to be there, and they inspect me real heavy, and if I leave my junk out there I get fined. I sometimes get fined for some of their junk, too.

So I think let's all look at the whole picture. I agree with some of the people that there's a lot of things that should be in this book that aren't there. There's some things in that book that shouldn't be there. You know, I don't want to be specific because I don't think the book was all that specific on some of the areas.

I see a lot of lines drawn across my private land, and everybody else's, that says that on this side of the line we can do this and on that side we can do that. Some of that land that you want to do things to isn't yours. Some of it's mine.

I think let's all look at the big picture. I think maybe if we sit down for a meeting like this, this one gentleman suggested earlier, you heard my gripes and I

heard your gripes and if we put it all together we would get somewhere.

That's all that I've got to say.

JOHN SINGLAUB: Thank you.

Is there anyone who signed up to speak who would like to speak at this time?

In consideration of the hour, and the hardness of the seats, would the two or three individuals that I cut off like to have an additional five minutes to speak?

Bill?

M. N. BRUNNER: Pass.

JOHN SINGLAUB: Steve?

STEPHEN P. HINCHMAN: Pass.

JOHN SINGLAUB: I'd like to remind you again that written comments will be accepted until November 5th, they do carry the same weight as the oral statements received tonight.

I would like to thank all of you for taking your time to come here this evening, including BLM employees on their own time.

This concludes the hearing.

Thank you very much.

(Hearing adjourned.)

BUREAU OF LAND MANAGEMENT

UNCOMPAGNE BASIN
RESOURCE MANAGEMENT PLAN
and
ENVIRONMENTAL IMPACT STUDYSEPTEMBER 24, 1987
BARBARA FOOTHILLS HOTEL
LAKEWOOD, COLORADO
7:30 P.M.FEDERAL REPORTING SERVICE INC.
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officials of federal, state, or local agencies who wish to testify at this hearing?

(No response.)

MR. SINGLAUB: Okay. If not, I've had a request by a gentleman from Colorado Springs who'd like to get home before dawn to speak first. John Stansfield.

MR. STANSFIELD: Where do you want us to speak from?

MR. SINGLAUB: Could you come up to the podium please and state your name, address, and who you represent?

MR. STANSFIELD: My name is John Stansfield, S-t-a-n-s-f-i-e-l-d. I'm representing the Pikes Peak Group of Sierra Club. I'm the conservation chair. I'm also a member of the Canyon City District Bureau of Land Management advisory committee representing the interest of environmental protection.

I have 15 years plus of sporadic wilderness study experience on both national forest and BLM lands, and over the last 10 years most especially on BLM lands. I was also a member of the Montrose District Gunnison wildland and Scenic River Study advisory group when the study was first initiated.

I'd like to defer my comments and perhaps a little bit of the time involved in them on the RMP

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recommendations to the comments of the Colorado Environmental Coalition. Kirk Koepsel will be presenting those later. I do have some specific comments regarding the recommendations in the wilderness supplement that I'd like to make.

First of all, I'd like to recommend the designation -- the recommendation and designation -- hopefully, in the future, along with many, many thousands of more acres in Colorado on BLM lands.

I'd like to recommend designation of Camel Back, the Gunnison Gorge, and the Adobe Badlands areas as wilderness.

I have some general reasons for that. First of all, these areas, unlike all the other designated wilderness areas -- almost exclusively in Colorado, so far, and to a large extent in the west -- these areas are low elevation areas and in and of itself, for the geologic, ecologic, climatological reasons that low elevation implies are valuable in and of themselves.

They offer diverse ecotypes, these areas, than currently exist in the wilderness system. Diverse geologic types than currently exist. More specifically, these areas offer winter range and winter recreation. They offer ecosystem diversity. They offer riparian habitat of a significant and different type. And these three areas hopefully can be protected by wilderness designation from

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excessive ORV use, or any ORV use, and preserved for such valuable things, given their unique nature as scientific study.

I have specific experience with two of the three areas and have read some about the Adobe Badlands. I would recommend Adobe Badlands on the recommendation of others and the readings and the slide shows which I've seen.

Gunnison Gorge is a unique area. The relationship of the river and the wild land surrounding that is a marvelous relationship and should, of course, be protected.

Camel Back is another area which I have personal experience. An area perhaps without the grand scenery of Gunnison Gorge, but with a grandeur of its own, and with a wild quality of its own in terms of opportunities for solitude for the kind of primitive recreation which I've experienced there. Gunnison Gorge is not only a wilderness candidate, but should be a designated wilderness.

Thank you very much.

MR. SINGLAUB: Thank you, John.

I'll now go down through the list of speakers in the order they signed in.

Carl Gerity.

MR. GERITY: Thank you for this opportunity to present these comments regarding the Draft Uncompagne

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Basin Resource Management Plan/Environmental Impact Statement.

MR. SINGLAUB: Excuse me. Could you give your name, your address --

MR. GHERITY: I will. My name is Carl Gherity and I represent Quinn Coal Company. My address is 5932 McIntyre Street, Golden, Colorado, 80403.

The Tomahawk Mine which is operated by Quinn Coal Company is in temporary cessation and is maintained on a standby basis.

The mine is located in Section 10, Township 13 South, Range 95 West, Delta County, Colorado, on private owned surface and coal rights. Most of the lands surrounding this property are private surface ownership and have federal coal ownership. According to the current NT plat of this township, the federal lands in Sections 1 through 12 are all classified as coal lands.

According to the Resource Management Plan, the lands under discussion are classified in management units A-6 under the current management alternative, B-1 under the production alternative, C-24 under the conservation alternative, and D-15 under the preferred alternative.

First, the current management alternative.

Although coal leasing is not excluded under the A-6 management unit, it is not a priority. Since the only

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federal interests in Sections 3, 4, 9 and 10, Township 13 South, Range 95 West is in the subsurface resources, and as these resources are contiguous to an operating mine, and as they are classified by GLO order as coal lands, Sections 3, 4, 9, and 10 should be included in the management unit A-1 as are the adjacent Sections 2 and 11 to the east and Section 8 to the west.

Under the production alternative, the management unit B-1, as classified, is suitable for this alternative.

Under the conservation alternative, the management unit C-24, as classified, is suitable for this alternative.

Under the preferred alternative, again, although coal leasing is not excluded under the D-15 management unit, it is not a priority. Again, as federal estates include only subsurface rights, and as these lands are contiguous to private lands with an operating mine, and as they are classified as coal lands by governmental Land Office Order, Section 3, 4, 9 and 10, Township 13 South, Range 95 West should be placed into the management unit D-7 as are the adjacent Sections 2 and 11 on the east and Section 8 on the west.

Thank you very much.

MR. SINGLAUB: Thank you, Carl.

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Bill Foreman.

MR. FOREMAN: My name is Bill Foreman. I live at 803 Ithaca Drive in Boulder, Colorado.

First off, I'd like to say that I'm very pleased to see that the Gunnison Gorge has been recommended for wilderness protection designation by BLM. However, I would like to encourage additional recommendation of the other two large sites, Camel Back and Adobe Badlands for preservation and protection under wilderness designation.

One thing that was stated in the opening comments was that water quality is being impacted by the utilization in the area. It's pretty obvious that wilderness designation would help protect these areas from over-grazing and off-road vehicle use. And that's probably two of the major reasons why the soil is ending up in the water and the like, and the vegetation is being eroded. So I would like to encourage you to have these other two areas, Camel Back and Adobe Badlands, as protected areas.

In addition, I'd like to recommend elimination of cattle grazing in two other important areas, Escalante Canyon and the Fairview Research Natural area. And as stated in the Draft EIS, in the whole Uncompahgre Basin, 95 percent of the land is being used for cattle grazing. That seems like an inordinately large amount of land being used for that purpose. I'd like to recommend substantial

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reduction in that utilization for both cattle grazing and also off-road vehicle utilization.

Thank you.

MR. SINGLAUB: Thank you, Bill.

Kirk Cunningham.

MR. CUNNINGHAM: My name is Kirk Cunningham, I live at 680 Tantra Drive, Boulder, 80303. I'm conservation chairman of the Sierra Club in Colorado, but I'll be speaking for myself tonight, and someone else from the club should be delivering the club's comments in Montrose.

I'm here to lend my support on behalf of the three wilderness study areas that are mentioned in the document, and I would like to thank BLM for recommending Gunnison Gorge. I think certainly its notoriety as a possible wild and scenic river -- part of a wild and scenic river area -- certainly is its own recommendation, and the area itself deserves it just by itself on the basis of its own properties. I think that's a good recommendation.

The other two -- see no reason from the document, to the extent that I'm familiar with it, to drop them. As far as I can see, there is no convincing or even no rationale given for dropping the areas. They do not seem to have any significant mineral conflicts. They seem to have reasonable wildlife and other natural values and other wilderness supplement values, and there is no good reason why

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they should be dropped out.

I'm not familiar with the areas personally, but I would like to be someday, and I would rather that they not be roaded (phonetic) or otherwise developed by the time I get there.

The three together only represent slightly under nine percent of the public lands, the BLM lands, in the resource area. I don't think this is too much to ask that we have those areas in wilderness.

I'd like to support also the recommendation in the document that there be two special areas protected, the Escalante Canyon and the Fairview Resource Natural area, although I think some tighter stipulations be placed on those, particularly for oil and gas exploration.

And I will be submitting comments for the club as far as water quality values and riparian values in the plan.

Thank you.

MR. SINGLAUB: Thank you, Kirk.

Todd Robertson.

MR. ROBERTSON: Okay. My name is Todd Robertson. I live at 6538 East Milan Place in Denver, Colorado, here tonight representing myself.

I'd like to start off by saying that I recommend wilderness designation for all three of the WSAs in

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the resource area. I believe that as there's increased demands by the human populations in the State of Colorado, the few remaining primitive habitats and ecosystems that are found should be protected. I've been to numerous BLM areas on the Colorado Western Slope. I'm shocked by the amount of ORV use and its accompanying habitat destruction and visual degradation.

I would like to thank the BLM for its recommended wilderness designation for the Gunnison Gorge area and I also feel the two other WSAs should be recommended as wilderness areas.

Looking over the documents I found no reasons for the two areas stated as being non-suitable for wilderness areas. A few of the things in the Camel Back WSA that I thought should make it recommended for wilderness is to protect endangered plant species in the area. It would be an excellent habitat to introduce desert big horn sheep, it's critical for deer and elk in their winter range, and also habitat for coyotes, raccoons, and mountain lions. Also, if there is no wilderness designation on this area, it's likely that ORV use will gradually destroy wild values of the area.

The Adobe Badlands WSA. A few things that I found why it should also carry a wilderness designation is that BLM stated in the technical supplement poor mineral development, as seen by four oil and gas wells that were dry.

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There is coal potential in the northern part, but the coal industry shows little interest in developing the area because of poor access. And, finally, this area also has threatened basin hookless cactus and endangered spineless hedgehog cactus.

In addition, the plan states that WSA in the resource area would provide a season of use, mainly the early spring and late fall, in the winter time for recreation end, so far in Colorado, there is limited use during this time of year in the already designated wilderness areas.

A couple more comments on the proposed Storm King Ski Area. I feel the ski area would destroy the critical elk calving ground and also the Escalante Canyon proposed ACBC should be designated on the area to prohibit livestock grazing more then is said by the BLM, since the area is protected for the critical plant species. And I feel that increased or sustained cattle grazing on the area would destroy the resource.

That's it.

MR. SINGLAUB: Thank you, Todd.

Earl Jones.

MR. JONES: My name is Earl Jones. I live at 3035 O'Neal Parkway, Unit S, as in Sam, 2L, Boulder, 80301.

To start out, with regard to the RMP, I have to say that this is the most difficult RMP to read that I've

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seen yet and, as a result, I don't really feel I can comment on it at this point. I hope to submit written comments later on.

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With regard to the wilderness technical supplements on the other hand, I do have some comments. To start out, generally on the subject of wilderness, my experience of the process of wilderness preservation in this country has tended to remind me of the line, "what's mine is mine, and what's yours is negotiable," in the sense that it seems that land that's been set aside for mineral extraction, for logging, for livestock grazing, that seems to be untouchable. But when we start talking about roadless lands that qualify for wilderness, everybody wants a little chunk of what's left. And so we look at these roadless areas. We take out a little chunk for minerals, and a chunk for logging, and a chunk for livestock, and most of the time what ends up we decide or you decide isn't worth designating wilderness anyway because there's not enough left of it. And I don't agree with that. I feel that at some point, if we're going to be serious about protecting wilderness, we just have to say this is it. No more. We're going to save everything we've got left. Maybe we'll go back and look at the lands that have already been taken up, and maybe we can save some of that and protect it, too. And I think that point has arrived in this country. And specifically with regard to

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the Wilderness Technical Supplement here, I've looked this over and you've had your three wilderness study areas. There appears to be no reason not to designate all three of them as wilderness. Okay?

You're recommending Gunnison Gorge. I thank you for that. But with regard to the other two, looking at your own impact analysis in Camel Back, if we designate that as wilderness, you say it has no anticipated impact on mineral resources. It would have the same impact on livestock grazing as your proposed action. And with regard to recreation, there would only be, in essence, a shift from motorized to non-motorized recreation. And in there I see no reason not to designate that as wilderness.

With regard to Adobe Badlands, yeah, designation of wilderness. Your own word, it would have a negligible impact on coal production. Otherwise, no impact on minerals. Same impact on the salinity and on livestock grazing as your proposed action, and the recreation would actually be significantly increased over the proposed action. Again, I see no reason not to designate that as wilderness.

And so I hope you will reconsider and recommend all three of these areas for wilderness.

Thank you.

MR. SINGLAUB: Thank you, Earl.

Karen Molliver? I apologize if I

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mispronounced your name.

MS. MOLLIVER: My name is Karen Molliver, M-o-l-l-i-v-e-r. I live on Flagstaff Star Route in Boulder.

I'd like first to express my approval of your decision to recommend Gunnison Gorge, but I'd also like to ask why not Camel Back and Adobe Badlands as well. According to the management plan, there are no serious conflicts. Attempts at oil and gas and coal mining weren't very productive. Obviously there is not very much timber. There's some grazing, but that doesn't seem to be in conflict with wilderness either.

Both areas have excellent wilderness qualities, as you stated in the management plan. They're primarily affected by the forces of nature. There are very few human imprints and outstanding opportunities for solitude.

In addition, in each of these areas there's an endangered species of cactus which would really benefit from wilderness designation.

You stated in the management plan that whether these areas were designated wilderness or not would have no effect on the status of these species. I have a hard time imagining that ORVs and increased grazing wouldn't have an effect on these endangered species.

I'd like to also comment on two other areas of critical environmental concern, the Escalante Canyon. You

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don't have any strong restrictions on this area. I'd like to also recommend that you don't permit livestock, that you do a mineral withdrawal, and I guess you also want to improve camping and bathing facilities. I don't really think that that's appropriate in an area of critical environmental concern. And I'd like to recommend the same restrictions for the Fairview Research National Natural Area.

These three areas together make up 8.6 percent of the entire area of the Uncompaggre Basin that you're looking at, and that's a really small amount of land to ask for, I think, for wilderness. The Forest Service -- 15 percent of the Forest Service area is wilderness, so what we're asking for is half.

I hope you take these recommendations into consideration. Thank you.

MR. VECCHIA: John, I have a question to clarify something. On the Escalante area and the other one, you said you wanted a mineral withdrawal. Is that total minerals or oil and gas or everything? You're talking about everything? Withdraw from total minerals?

MS. MOLLIVER: Yeah. I think they're really small areas.

MR. VECCHIA: You mean all minerals? That's all I needed to know.

MS. MOLLIVER: Right.

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MR. VECCHIA: Yes.

MS. MOLLIVER: Thank you.

MR. SINGLAUB: Thank you.

Rocky Smith.

MR. SMITH: My name is Rocky Smith. I live at 1030 Pearl, Number 9, in Denver, and I'd like to talk first about wilderness. The need for wilderness I think has been pretty well established. We need to have some land that is off limits to development that we can say with confidence will not be developed and provide a refuge for all the development around it. Wilderness provides outstanding opportunities for primitive recreation and solitude.

Our existing wilderness system is okay as far as it goes. We have quite a few acres in the wilderness system and some yet to be determined, but most, not all, but most of our existing wilderness is what I call rock and ice. High altitude, high peaks, and that's very beautiful, but a lot of it is inaccessible in the winter basically unless you want to hike or ski a long, long way. Hike on snow shoes or ski. So there's definitely a need for the low elevation wilderness. As an earlier speaker said, these low elevation areas often have different ecosystems, different geology, they're available for year round use. They often don't require a long, long hike because the areas are small, so they're available to a lot of people. And I think the BLM has

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1 a responsibility to provide a certain amount of this
2 wilderness for the people of Colorado and the people of the
3 nation to use and enjoy and provide refuges from development.

4 In this light, the recommendations are not
5 entirely to my liking. I do like the recommendation for
6 Gunnison Gorge to be wilderness. This area is, I understand,
7 quite outstanding for river based recreation and also land
8 based recreation. I'm glad to see you recommended it.

9 I don't really understand, however, why the
10 BLM did not recommend the other two areas for wilderness
11 designation. There appear to be very few conflicts. Camel
12 Back, especially, has low mineral potential. There are no
13 existing leases or claims according to the Wilderness
14 Technical Supplement. There are three species of threatened,
15 endangered, or candidate for one of those listings, species
16 of plants. And under the preferred alternative, this area
17 would be managed, I believe partially for riparian
18 management, which protects riparian ecosystems. And also
19 there would be limits placed on off-road vehicle use. It
20 seems to me that wilderness would accomplish the same goals
21 and probably do them just as well, if not better.

22 Also, I believe Camel Back is contiguous to
23 some Forest Service areas on the Uncompangre Plateau that
24 were at one time recommended for wilderness, and maybe
25 someday putting two wilderness systems. So I believe Camel

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1 Back should be recommended for wilderness designation.

2 Adobe Badlands, 10,425 acres. This area does
3 not have a great deal of conflicts either. The coal in the
4 northern portion of the technical supplement admits that
5 industry does not appear to be interested because there's no
6 transportation system in place and there are no other mines in
7 the area. There appears to be, at least theoretically, a
8 moderate value for oil and gas. But there have already been
9 dry holes and, therefore, industry does not appear to be too
10 interested. So further activity is unlikely. The same with
11 the mining claims. Additional activity is not expected
12 there.

13 Under the preferred alternative for Adobe
14 Badlands, there would be salinity control measures
15 undertaken, grazing would be reduced, and ORV use would be
16 closed on 8,358 acres. And, also, somewhere in the RMP
17 there's a mention of possibly establishing a herd of big horn
18 sheep. I don't see why wilderness would not do the same
19 thing and do it better. All of the things that would be
20 undertaken under the preferred alternative could be
21 accomplished probably better by wilderness designation.

22 A few other parts of the plan are of concern
23 to me. The approval of a ski area at the Storm King Mountain
24 site appears to me to be unwarranted. First of all, we don't
25 need another ski area in Colorado. We've got too many

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1 already. For another thing, it may not snow very much there
2 in quite a few years. Going to have trouble getting a ski
3 area there unless someone's got an awful lot of water to make
4 snow with. Also, the area is an elk calving ground. So I
5 recommend that the BLM change this in the final RMP.

6 I also ask that you ban grazing in the
7 Escalante Canyon area of critical environmental concern, and
8 the research natural area, Fairview, both sections of it.
9 And also withdraw minerals. I'd like to point out that
10 almost the entire resource area is open to oil and gas
11 leasing, and locatable mineral location, and to have an ACEC or
12 an RNA and allow mineral location or oil and gas leasing
13 seems to me to be a contradiction in terms. If you have an
14 area that for some reason has a critical environment, why do
15 you allow destructive activities such as grazing, oil and gas
16 leasing, and mineral location? And the same with the
17 research natural area. If the goal there is to set aside an
18 area that is primarily natural and research its scientific
19 and educational attributes, if you allow destructive
20 activities, it seems to me you're going to be defeating your
21 purpose. And, therefore, I recommend that you make these
22 changes in the final and I will be anxiously awaiting to see
23 what you do.

24 Thank you for this opportunity to testify.

25 MR. SINGLAUB: Allison Graves?

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25 need another ski area in Colorado. We've got too many

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1 MS. GRAVES: My name is Allison Graves, G-r-
2 a-v-e-s, and I'm co-director of the Wilderness Study Group
3 from the University of Colorado. My address is 585 Pica,
4 Boulder, Colorado, 80302.

5 I'd like to recommend that Camel Back,
6 Gunnison Gorge, and the Adobe Badlands be recommended as
7 wilderness. I recommend these due to their outstanding
8 wilderness characteristics and the few conflicts of interest
9 within the areas. I don't really understand why they weren't
10 recommended due to the lack of conflicts in the areas and the
11 admission that they do have good wilderness characteristics.

12 Also, I'd like to point out the presence of
13 the spineless hedgehog and the hookless cacti in these areas.
14 I know you put that in the technical supplement.

15 On the areas of critical environmental
16 concern I would like to recommend new surface occupancy,
17 no stock grazing, and a mineral withdrawal, total mineral
18 withdrawal. Also, the new camping facilities and bathing
19 improvements I think are not compatible with the area of
20 critical environmental concern.

21 I'd like to point out that the wilderness
22 recommendations of all three areas is very small. Like was
23 pointed out before, it's only 8.6 percent of the area and I
24 wish it could be more. But if I can get that much, I'd like
25 to take it.

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I feel that wilderness areas in Colorado would help the Montrose area out. I feel that the Storm Mountain Ski Area development would also be incompatible with the elk calving grounds. And that's all I have to say.

MR. SINGLAUS: Thank you.

Steve Pettit.

MR. PETTIT: My name is Steve Pettit and that's spelled P-e-t-t-i-t. I live at -- well, I live a few places in Boulder, but you can reach me at Post Office Box 17126 Boulder, Colorado, 80308.

I'm mostly going to speak with regard to wilderness. There were three areas that have been studied and only one recommended, being the Gunnison Gorge, and I applaud you all on that. Two other areas being Camel Back and the Adobe Badlands, I've been to both and both offer quite unique characteristics for solitude and wilderness recreation.

The Camel Back area itself, I don't see why that wasn't included for recommendation. There are no mineral or timber conflicts with regard to the area. Also, you all are going to cut back on the grazing itself in the riparian area to try to avoid further damage to that. I think you all need to reconsider your -- I don't know if lapse is the right word -- but your failure to include both Adobe and Houbideau because I think a lot of people, if they go there, they could find a lot of personal benefit from both

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those areas. And I hate talking in front of people because it just scares me. Thank you.

MR. SINGLAUS: Thank you, Steve.

Bruce Robson.

MR. ROBSON: My name is Bruce Robson. I can be reached at P.O. Box 17126, in Boulder, 80308. And I guess first I'd also like to thank you for the designation of the Gunnison Gorge, and I would also like to express my opposition to your not designating the other two areas, Camel Back and Adobe Badlands.

I have been to the Adobe Badlands and, as you found in your report, I also found nothing wrong with it. No conflicts as far as wilderness designation. So I guess I found it somewhat surprising that it wasn't recommended with no timber, no minerals conflicts, and with the outback in grazing proposed. So I would like to recommend that you would designate those areas for wilderness preservation.

I'd also like to express that in the areas of critical environmental concern, I'd like to recommend no occupancy, mining withdrawal, and no grazing. And that the Storm Mountain Ski Area be proposed or that that be opposed in difference to the elk grazing land.

I also have problems talking in front of people. Thank you.

MR. SINGLAUS: You're among friends. Don't

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worry about it.

MR. ROBSON: Thank you.

MR. SINGLAUS: Ros McClellan?

MS. MCCLELLAN: My name is Ros McClellan, R-o-s M-c-C-l-e-l-l-a-n. I live at 483 Marine, Boulder, 80302.

I wanted to thank the BLM for coming over from the West Slope to hold this hearing for us so we didn't have to come over and see you in Delta.

I've been following the BLM wilderness recommendation packets for about six years, and I think I've really never seen such lame reasons for excluding wilderness areas as I did in this particular Wilderness Technical Supplement. In cases like Bull Gulch, or Skull Creek, or Willow Creek, or other areas that have been excluded, at least in the preliminary recommendations, at least there's some pretext or some reason given for why they've been excluded. They're called mediocre, or maybe they have manageability conflicts due to boundaries that don't follow topographical lines, or sometimes there's a PLPMA release, or something like that. But read the technical supplement over and over again and I really couldn't find any specific reasons why these areas had been excluded. There were glowing descriptions of them, lyric, poetic descriptions of Camel Back, and the opportunities for solitude, and for reintroduction of big horn sheep, and then I couldn't see the rationale for why the area

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had been excluded.

It looked as if they are, in fact, going to be managed basically as wilderness, both Adobe Badlands and Camel Back. It seemed as if maybe one -- I guess I was going to say that even if Camel Back were recommended, it would increase the recreational visitor days. According to the economic tables, that would be beneficial for the resource area. I think Camel Back would give 500 rather 300 recreational visitors days per year.

So I was feeling really perplexed. It looked like maybe you wanted to keep them open so you could do vegetative management to increase wildlife forage. But I think opening them up to ORV is just going to outweigh any advantages of being able to improve the vegetation.

So then it occurred to me that maybe it would allow more ORV use if you kept Camel Back open, but the figures were pretty negligible. So the only thing I could think of, which I'm sure isn't the case, but it looks as if some kind of quota system is being imposed from somewhere. I had the same impression in areas like San Juan, San Miguel, and White Snake, and Glenwood Springs, and Canyon City. Areas where large percentages -- up to 50 percent or more of the wilderness study acreage was excluded for no very conclusive, persuasive reason. And I don't know where, if at all, the quotas are coming from, but I'd like to say tonight

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that I think that Mr. Morck, and Mr. Burford, and Mr. Hodel should know that you are nowher near meeting any kind of wilderness quota in my opinion. And even if you were to designate or recommend all three wilderness areas for suitable for wilderness in the Uncompagwe Resource Area, that would still only give 8.9 percent of the entire resource area.

If you were to designate the entire 750,000 acres of potential BLM wilderness in all of Colorado, that is again only nine percent of BLM holdings managed lands in Colorado. And that 750,000 acres is only a little over half of the original, initial inventory of 1.3 million. And you're only recommending half of that or less.

What it looks like is that instead of dividing up the pie, you're dividing up a piece of the pie. And I feel that in terms of the need for wilderness for spillover of civilised humans and for refuges for wildlife who have only a few islands of protected habitat left, the quota is very much too low as it is.

If we go on to the State of Colorado, even if the entire remaining four percent of potential wilderness is designated, again, that would only give four percent added to the existing designated four percent. That's only eight percent of Colorado. That's 92 percent of Colorado that is now developed and will never again be wilderness.

Nation-wide, the figures are even more skinny

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and in my opinion insufficient. Two percent of the lower 48 I believe is wilderness.

I was going to bring tonight a map that shows that Colorado is one of only six or seven states with any existing or potential wilderness left in this country, and I feel that BLM has a responsibility beyond the boundaries of Colorado to consider that you have under your jurisdiction one of the few remaining potential wilderness resources left in this country. And for the sake of the rest of the country which doesn't have this resource, you need to widen your horizons. Not just think about how much the Uncompagwe Resource Area should have in terms of its needs, but what does Colorado need, what does the whole country need.

Over the last century a lot of people have had a chance to claim these areas. The homesteaders, and the loggers, and the miners, and the ranchers, and the OVRers, and the oil and gas leases. Everybody's had a chance to claim those three little tiny areas that you are now considering, and I would like to ask when we will decide that no one really wants them anymore. They haven't been wanted up until now. There's been plenty of reason to want them. No one has claimed them. I think now's the time when we can decide that no one really does want them, therefore, wilderness could claim them.

I guess basically the way the technical

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supplement reads now, I don't think your reasons for excluding those areas are defensible. I don't think they'll stand up with Congress or with some of the rest of us environmentalists when push comes to shove.

As for the BMP, I didn't read it cover to cover for eight hours as I should have, but I do have a vague impression that it wasn't as clear as some of the others I've read. It took me about three-quarters of an hour to find figures on a number of ORV acres that would be precluded by designation of all three areas. And then when I found that figure and I compared it to the comparison chart, the figures seemed to be inconsistent. I didn't see clear charts as to how much oil and gas potential would be foreclosed by wilderness designation. I'd like to see more charts and more clear-cut figures showing what we're really losing by the designation of all three areas.

MR. SINGLAUS: Five minutes, if you can wrap it up.

MS. MCCLELLAN: I think that's about all I had to say. I guess, basically I agree with a lot of people in this room. I think you can designate a lot more and still not be anywhere near your quota.

MR. SINGLAUS: Thank you.

NORM MULLEN.

MR. MULLEN: My name is Norm Mullen. That's

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M-u-l-l-e-n, I reside at 955 Grandview, in Boulder, Colorado, 80302.

I would just like to urge that BLM recognize the three wilderness study areas for protection. I'm concerned especially about the Gunnison Gorge Wilderness Study Area. I've been the Gunnison Canyon but I have not yet been into the Gunnison Gorge. I would like to run the river. And I think BLM for its protection or its recommendation and protection. I also urge protection of Adobe Badlands and Camel Back. I also urge that BLM consider protection of the adjacent Forest Service area on the plateau to Camel Back. I urge that BLM consider better protection of the ACECs of Fairview and Escalante, including no surface occupancy, leasing, mineral withdrawals, and limitations on grazing. And I urge that the Storm King Area not be recommended as suitable for a ski area development. I think there's enough ski areas in that section of the state currently. And I just want to thank BLM for coming over here to hear us comment on their plan and thank you for listening to my comments. I'll be probably submitting written comments in more detail later. Thank you.

MR. VECCHIA: I have a question for Norm. You talked about protection of the Camel Back and Adobe. Are you talking about your recommending that we nominate them suitable for designation? Is that what you're saying?

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MR. MULLEN: Yes. I'm sorry if I didn't make that clear. I support wilderness protection for both those areas as well as the Gunnison Gorge.

MR. SINGLAUB: Thank you, Norm.

Kirk Koepsel.

MR. KOEPSSEL: I had prepared testimony a little longer than five minutes. Can I be deferred until the end?

MR. SINGLAUB: I'll give you a minute from John Stansfield. Would you like to be the last speaker? We can do it that way.

MR. KOEPSSEL: Yes. Why don't we just do it that way.

MR. SINGLAUB: Okay. Martin Walter.

Can we take about a two minute break?

(Whereupon, a brief recess was taken.)

MR. WALTER: My name is Marty Walter. I live at 3333 Nevo (phonetic) Road and it's not in any town, but it can be reached through the Boulder Post Office, 80302.

I handed out this little sheet here, a map, which shows the USA at night. And it clearly shows that we wilderness folks are wimps. We lost the war. We've lost the war. There isn't much left to be preserved. And I've been to a lot of wilderness hearings in the past and it's the same old story. When you talk about wilderness designation, we

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wilderness wimps are arguing and pleading for 10,000 more acres in the Camel Back to be preserved, 10,000 acres in Adobe Badlands to be preserved, to go along with the 20,000 acres in Gunnison Gorge.

Those numbers might sound large until you compare them with the 200,000 acres that are going to be open to ORVs and the 190,000 additional more after that that will be open with some restrictions which weren't designated this evening. But they are in the report, presumably.

So, we have a single use. I see those ORVs, on 400,000 acres, tearing the place up. One-tenth of the amount of that land is preserved for solitude, science, archaeology and any of the unknown things that we might discover we wished we saved wilderness for at some later time.

So I'm pleading for the scraps. Okay? We've lost the war so we're pleading for the scraps. And to show you how much I'm committed, I didn't eat -- haven't eaten for the last eight hours. I can barely stand up here. I don't have any energy left. But I'm still pleading.

Camel Back. I overheard some conversations and so forth. You can't say it's not suitable. I mean, you might not declare it wilderness, but you just can't say this area is unsuitable for wilderness. You might say we don't want to make it wilderness or the Montrose County

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Commissioners don't want to make it wilderness, but you can't say that it's not suitable.

Some folks maybe don't want to preserve the wilderness because they want freedom to do whatever they want with this last scrap. Well, I want freedom, too. And there's a quarter of a billion Americans out there that some day are going to want freedom to see something that hasn't been trampled on or used. And the excuse that we have the Dominguez Canyon as a comparable area, even it was identically isomorphic, excuse me, to the Camel Back region, okay, so we have two of them. That's great. But the Dominguez Canyon, as I understand it, located in the Entrada sandstone in the Camel Back area is in a higher geological strata. So that's not a good excuse. I see there are no good excuses for not preserving this area.

So, 8.6 percent. If we got all three areas, we're talking 8.6 percent. If only the Gunnison Gorge, we're talking four percent.

One last string of comments here. About the Storm King Area. The Forest Service right now is considering permitting for another 100,000 ski areas per day and this area doesn't compare with any of those. That's in addition to the roughly 100,000 ski areas per day that we already have. And this area doesn't compare to any of those areas in my estimation.

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So, I don't know. I'm just at a loss to figure out what else to do. I mean, maybe I should start building tactical nuclear weapons in my basement and get a few ORVs myself and mount them and go around and try to defend what scraps are left of the wilderness. But somehow I don't think that strategy is going to work. What we can do and what we pray is that there'll be enough public input on this, enough people that care to get these last remaining scraps preserved. Otherwise, we'll have Elway. We'll have just Elway. It's sad. There are not totally civilized people like me going to go for the recreation? Thank you.

MR. SINGLAUB: Eleanor Von Borgen.

MR. VON BARGEN: My name is Eleanor Von Borgen. I live at 3555 East Yale, apartment 1, Denver, Colorado, 80222.

I'm here tonight representing the Colorado Native Plant Society as the president, and I want to thank BLM for this opportunity to comment on the Uncompahgre Basin Resource Management Plan.

The Colorado Native Plant Society will submit detailed written comments on the RMP, so I'll speak only briefly tonight about the provisions relating to plants.

We recognize that the endangered, threatened candidate, or sensitive plant species occurring within the planning area are known and we commend you for giving them

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some consideration. We urge you to provide adequate protection for these species wherever they happen to occur. The Colorado Native Plant Society does support the designation of the Fairview RNA, the Escalante Canyon as an ACEC, as it's outlined in the preferred alternative, and we also would recommend Camel Back wilderness area and Adobe Badlands for wilderness designation, as well as Gunnison Gorge.

We request that you protect *Eriogonum pelinophilum*, *Panasonum retrorsum* in the Fairview Research Natural Area, *Scarocactus glaucus* in the Gunnison Gorge Wilderness Study Area, *Echinocereus triglochidiatus varinermis* and *Astragalus linifolius* in the Camel Back Wilderness Study Area, *Scarocactus glaucus* in the Adobe Badlands, and for the listed plant species and the unique plant associations found in the Escalante Canyon.

These are valuable resources. Once these plants are gone, you can never replace them. Just pause and think for a moment what the role of plants is, and where would you be without them.

We also comment you for your recognition of the value of the riparian ecosystem, and we urge you to adequately provide for its protection within your planning area.

I want to thank you again for allowing us to

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come and present comments, and our written concerns will be forthcoming.

MR. SINGLAUB: Thank you.

Scott Hatfield.

MR. HATFIELD: My name is Scott Hatfield. I live at 1155 Marina, number 208, in Boulder, 80302, and I'd like to thank you for recommending the Gunnison Canyon for wilderness designation. And I think that the Adobe Badlands and Camel Back area should also be designated as wilderness areas.

I can see no reason in your technical report why they shouldn't be, and as long as you don't see any reason why they shouldn't be, I'm really surprised that you didn't recommend them to be designated as wilderness areas.

What's really of concern to me is what's going on with Storm King Mountain and the elk calving grounds there. People come to Colorado and they think that, you know, there's wild areas and, you know, they have visions kind of like Yellowstone Park a lot, and they'd love to see animals. And if you kill off their breeding ground, then we just will have a drastically less amount of this species. That is, the elk. And I guess it's not really proper to suggest that that be put up for consideration as being designated as a wilderness area, but I would like you to see if you can't manage Storm King Mountain as an elk calving

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ground instead of a ski area. From what I understand, it doesn't even snow there a lot every year.

I'd like you to consider large game -- large animals I should say, instead of game, in most of your considerations of wilderness areas and breeding areas.

Thank you.

MR. SINGLAUB: Thank you.

Dave Allured.

MR. ALLURED: My name is Dave Allured. I live at 4231 Eaton Court, in Boulder.

I thank the BLM for this opportunity comment on their Resource Management Plan for the Uncompahgre Basin. I'd like to read through my specific recommendations first, and then say a couple general things.

I ask the BLM to manage the north and of Cimarron Ridge as a first priority, natural wildlife habitat. Most importantly, elk calving grounds. And second priority for primitive non-motorized recreation as appropriate, and specifically not for ski area development. I think that the area has important environmental characteristics in that there are several factors why these ski area or ski area development in that area would be a bad idea, specifically, climate, economics, et cetera.

I recommend that you manage Escalante Canyon as an area of critical environmental concern. That's an

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ACEC. That specifically it be managed for its wildlife values, undeveloped to recreation, and that you do not allow any mineral entry or occupancy in the area, and that you also allow no livestock grazing there, in both cases, to protect environmental values which I believe are very important.

On Fairview Natural Area, basically I have the same recommendations. Manage it intensively as a natural area, protect the wildlife and plant communities there, and prohibit mineral entry or surface occupancy, and prohibit livestock grazing.

I recommend that you designate Adobe Badlands and Camel Back as wilderness. I feel that their environmental values and their value for primitive and solitary type recreation far outweigh any possible alternative uses for these areas.

In general, first of all, I have noticed that of the 17 people, I believe it is, who have spoken so far, eight of them before we have pointed out in one way or another that either they don't understand your rationale for having excluded Adobe Badlands and Camel Back from recommendation for wilderness or, in general, they don't understand your rationale for the general choices of management alternatives that you have made in your Resource Management Plan.

I have seen other BLM Resource Management

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Plans and they include specific written descriptions of rationales. Those rationales are indeed missing from the written portion of this plan, and I am sorry to say that I view this as a fatal flaw in a plan that the public is supposed to be commenting on at this time. And I can refer you to specific RMPs in other BLM units that contain this element, and at least that provides the public and people such as myself an opportunity to see whether we agree with the judgments that you made, the values that you -- I should say your management team -- has made in selecting one alternative over another. And for those people who haven't -- some of these speakers that I've referred to didn't specifically notice -- okay. Some of them didn't specifically say the rationale was missing. They said they didn't understand it. A couple of people actually pointed out the rationale was missing. I think this flaw is so fundamental that I would recommend that you publish your rationale in as much detail as you see appropriate and provide for a second set of public hearings in the public areas that you've already identified for these hearings so that we may have a better opportunity to comment on rationales that, frankly, we don't see to understand right now. And that the opinions given forth, the testimony given forth in these hearings, be taken into account in your final Resource Management Plan.

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Furthermore, I believe that, in general, the BLM and in particular some of the decisions about wilderness in this Resource Management Plan have misinterpreted the intent of the Wilderness Act of 1964. Specifically, the Wilderness Act specifies that certain areas should be selected because they provide outstanding opportunities for primitive recreation and solitude and other outstanding values, and that I'm afraid there's a gross misinterpretation of what outstanding means. I got an informal comment from one member of your team at the question and answer session earlier this evening. That the rationale against wilderness recommendation of -- I believe it was Camel Back WSA -- the two rationales given were one, that simply, the WSA was no longer adjacent to the Roubideau WSA in the national forest and, number two, the Dominguez WSA nearby had been recommended by the BLM for wilderness and that it was 70,000 acres and, therefore, there wasn't a need for recommending Camel Back.

First of all, I'm not necessarily going to construe it that that's the official rationale of BLM for making that particular decision about Camel Back. However, I will comment to those two points in the rationale.

I see no reason whatsoever that whether there's an adjacent WSA recommended wilderness area or not -- I see no reason for that having any bearing on whether an

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area be selected, if the area by itself qualifies for wilderness designation. And, secondly, the proximity of the Dominguez recommended wilderness area, 70,000 acres nearby, I feel comes right back to what I'm calling this misinterpretation of the Wilderness Act.

The connotation there is that Camel Back is not unique or outstanding in the face of the nearby Dominguez recommended wilderness. I think that's extremely poor judgment simply because Camel Back is in its own self, it's in its own macrocosm, it's a unique area. The canyons there are different, the vegetation, the climate, et cetera, may be similar, but it's not identical. In the meantime, it is an existing primitive area that many people now treasure and many, many, many poor people in this country will treasure as time goes on as the opportunities for solitude and wilderness recreation and protection of wildlife in truly natural conditions gets less and less and less because of development in this country.

Take a look at the beautiful pictures on this wall in this room here. These show western desert scenes. Scenes of hilly areas similar to the Uncompahgre basin Natural Environment. These pictures were bought by this Ramada Inn facility because these are the kinds of areas that many people in the United States like to enjoy for any of many values because they treasure the land in its pristine

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and undeveloped state. You notice in these pictures there are absolutely no signs whatsoever of development in any form, and they're just another indication of how important this is.

In conclusion, I would urge the BLM to fundamentally reassess the way it now interprets the Wilderness Act and also I want to fully support your designation of the Gunnison Canyon for wilderness, and I thank you very much for that recommendation. Good night. Thank you.

MR. VECCHIA: I got a couple questions for just clarification.

MR. ALLURED: Fine.

MR. VECCHIA: Okay. When you started talking, you mentioned something about the north end of Cisarren Ridge or elk calving. Are you talking about the Storm King Peak area? Is that what you're talking about?

MR. ALLURED: I'm not sure. Specifically what I'm talking -- I didn't have very much time to read the RMP tonight. But I can specify them it in a different way. There's an area in the plan that specified for ski area development.

MR. VECCHIA: Okay. That's the Storm King Ski Area.

MR. ALLURED: And that's the area that I

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1 recommend.

2 MR. VEOCHIA: Okay. Another question just
3 for clarification purposes.

4 MR. ALLURED: Yes.

5 MR. VEOCHIA: You said something about the
6 Escalante Canyon should be managed for the plants. Are you
7 talking about the whole canyon or just the area that we
8 outlined as an ACEC?

9 MR. ALLURED: I'm talking about the ACEC
10 area.

11 MR. VEOCHIA: Okay. Thank you.

12 MR. ALLURED: You said something there that
13 implied miscommunication or misunderstanding of something
14 that said. You referred to the recommending that that ACEC
15 be managed for natural plant conditions. That wasn't exactly
16 what my recommendation was.

17 MR. VEOCHIA: I understand that. I just want
18 to make sure I understand the area that you're talking about.

19 MR. ALLURED: I'm talking about the ACEC.

20 MR. SINGLAUB: Don Thompson.

21 MR. THOMPSON: My name is Donald Thompson. I
22 live at 1201 Adams in Denver. I want to thank the BLM for
23 having the hearing and thank you for your wilderness
24 recommendation for Gunnison Gorge, and to add what probably
25 other speakers have said tonight about the feeling that Camel

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1 Back and Adobe Badlands need to be added also as wilderness
2 recommendations.

3 The other proposed use for these areas, in my
4 way of thinking, would be more costly for the taxpayer in
5 that a typical multiple use that the BLM would put these
6 areas to would include substantial subsidies to ranching
7 communities. I think that Colorado and the nation would be
8 much better served by having these areas remain in their
9 primitive, undeveloped, and wilderness use. The need for
10 wilderness areas in Colorado is I think substantial, and out
11 of 755,000 acres or whatever that is being covered by this
12 management plan, the suggestion that forty something thousand
13 be retained as wilderness to me seems only logical. Too
14 often, unfortunately, the multiple use, which is suggested,
15 turns out to be multiple abuse, and I think our country is
16 not so poor but that we can put aside more area than is being
17 proposed for future generations.

18 One of the things that always disturbs me in
19 a management plan, especially on these two areas, Camel Back
20 and Adobe Badlands, where I don't think that any other
21 specific uses are being proposed, is the BLM and its
22 employees are fallible and can make a mistake. I would much
23 rather see that mistake made in making these areas
24 wilderness. If that was or does turn out to be, and that
25 later generations decide that it was a mistake to make Camel

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1 Back and Adobe Badlands wilderness, that's something that
2 could be corrected. If the BLM decides now that some of
3 these multiple uses are appropriate there, the possibility of
4 going back to wilderness qualities is substantially less.

5 So basically what I'm saying is if we are
6 going to make a mistake, let's make a mistake that can be
7 corrected by future generations. Let's not take that
8 decision away from them. Let's error on the side of too much
9 wilderness. I can't conceive of how that would be possible
10 with the small percentages that we're talking about. But I
11 think that's a much safer decision for the BLM to make.

12 The proposed ski area -- all the things that
13 I have read -- maybe the BLM has information I'm not privy
14 to, but everything that I've seen in the Denver newspapers
15 indicate that skiing and the demands for skiing, if anything,
16 are static, and that the populations -- and of course this is
17 what determines a lot of these things. The populations which
18 are potential skiing populations, age, characteristics, and
19 so forth is getting smaller. Some of the Forest Service
20 areas are proposing additional ski areas. Many of the
21 existing ski areas are proposing expansion. Even if there
22 were no conceivable other use for Storm King Peak, I think a
23 potential ski area would be idiotic, since it does have
24 substantial uses, the elk calving area. The logic of not
25 having it treated as such in the management plan really

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1 escapes me. I could maybe see if we were saying that this is
2 some mineral value or this has some other values, timber
3 value. But to say that this is a potential ski area to me is
4 ludicrous.

5 Anyway, I appreciate the opportunity to
6 speak. I hope that the BLM will look at the paltry amount of
7 wilderness being proposed out of this 755,000 acres, and I
8 hope the final RIS will come to a better conclusion. Thank
9 you.

10 MR. SINGLAUB: Thank you.

11 Has anyone else signed in to speak, Bob?

12 Is there anyone who'd like to speak who has
13 signed not in except for Kirk?

14 MR. ALLURED: There were two over here.

15 MR. VEOCHIA: Okay. Could you come and take
16 your five minutes then? You may end up with five after all,
17 Kirk.

18 State your name and I'll ask you to sign this
19 afterwards.

20 MS. MILLS: My name is Polly Mills, P-o-l-l-y
21 Mills. Address is 387 Ferrand Hall, Boulder, Colorado,
22 80310.

23 I'm currently living in Boulder, but I'm a
24 New England native. I decided to come to college. I took a
25 topographical map and discovered the Colorado Rockies and

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decided to come to Colorado. I pay \$13,000 a year to enjoy it. I've paid my \$25 a day to go skiing in the Rockies. I love it. But the most impressive part of the whole state that I've seen has been the western slope, the Grand Junction/Gunnison River area.

The fragile environment, endangered cactus that's been talked about so often this evening, the limited and valuable water -- it's unique and has impressed me beyond belief.

These areas appraise the cities of and around Montrose and Delta to the State of Colorado and the whole united states.

The WSAs in Colorado are like nothing in the east. The people of Colorado are extremely fortunate to have these unique areas and should wholeheartedly respect them.

I highly recommend and support the designation of the Gunnison Gorge, Camel Back, and Adobe Badlands in this area in the western slope as wilderness. I hope you take it into consideration. Being from a different part of the United States, forking out my money, that it's more than just a local issue here. I think it's important to recognize the federal level.

You talked about having going to Congress, the Secretary of Interior, the President of the United States. He's mine as much as yours. And so are these lands

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that you're talking about.

That's about all I have to say. I thank you very much.

MS. SPENCER: My name is Jenny Spencer. I live at 1055 30th Street in Boulder. I'm speaking for the Environmental Center at the University of Colorado in Boulder.

I would just like to say in lieu of the comments made for environmental protection of these wilderness areas that I support them wholeheartedly and that I thank you for designating the Gunnison Gorge area as wilderness. And I would also like the other two areas, Camel Back and Adobe Badlands to be designated as well.

MR. SINGLAUB: Is there anyone else? Is there anyone who gave a statement who they feel I cut short and would like to finish up?

Kirk Koepsel.

MR. ALLURED: I appeal to your best judgment as moderator of this meeting to allow Kirk a good bit of time to say his piece, and I think that everybody here would be very impressed.

MR. SINGLAUB: Okay. We'll be out of here by 9:30. I hope you can make it by then.

MR. KOEPEL: My name is Kirk Koepsel. I reside at 11608 South Apache Trail, Conifer, Colorado,

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80433. I am representing the Colorado Environmental Coalition as their public lands coordinator.

I first had some overall impressions about the Resource Management Plan. I have found it to be very vague, much more vague than most of the other BLM plans that have come out. I think it's going to take a lot to get it into shape by the time the final EIS comes out. And that there's going to be some problems with not allowing the public to have the opportunity to comment on some of these major changes that I feel are necessary to have it comply with FLPMA and NEPA.

One of the hardest things to deal with in this plan is it over and over again stated there will be substantial impacts, although these impacts are never quantified in the plan, which is amazing to me. Most plans really spent some time on quantification of the impacts.

I'd like to start out first with the coal management program proposed in the plan. Some of you may be aware that the Colorado Environmental Coalition had quite a history working with coal in the resource area. In 1976, we filed an administrative appeal on the land use plan for the North Fork Planning Unit in which we did win that appeal. In 1981, when a coal update amendment was prepared, once again we filed an appeal and there was a 50 percent reduction in the land being recommended for coal.

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One of my concerns about the plan, the way it's stated right now, is that the threshold concept was completely ignored. This is required under the Federal Coal Management Program, to look at threshold, socio-economic thresholds, wildlife thresholds, and I find the plan in violation of the Federal Coal Management Act.

There was a four fold increase in the amount of coal available for coal leasing. If current management were to continue in that area, there would be only 20,737 acres recommended for possible coal development.

Under the preferred alternative, that increases to 83,334 acres which is the same as the production alternative. In fact, the conservation alternative, and I can't understand why this is called the conservation alternative, recommends 82,000. I don't see a whole lot of variation among the alternatives except for the current management.

The plan states that -- this is an exact quote out of the plan. "The possible leasing of up to 5,730 million tons of coal would far exceed coal demands over the life of the plan." Then why are we leasing it? I don't think we need to lease for lease sake. I don't think we need to lease to keep the BLM employees who work in coal busy. I think that leasing needs to be based on demand. And I think we found that over and over again with what's happened

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1 nationally when James Watt leased coal in the Colorado River
2 Region at firesale prices, we saw the public outcry which
3 happened there. That the government was not receiving the
4 funds that should have been available or it should have
5 gotten for that sale. And I don't think we should be letting
6 this happen in the Uintah Southwest Region either.

7 I found the plan to be in violation of the
8 Secretarial Issue Document which was realized in 1986 to get
9 the coal plan moving again. It says that there will be an
10 assessment of coal development potential. I did see an
11 assessment there, but I saw it completely ignored in the
12 recommendations.

13 Application of unsuitability criteria. I was
14 unable to find that in the plan. I may have missed it, but
15 it was obviously a small part of the plan.

16 Consideration of multiple use trade-offs were
17 ignored once again. And the Secretary also outlined criteria
18 for other issues that should be covered. Wet lands and
19 riparian habitat, sole source aquifers, class 1 PSD areas,
20 buffer zones to national parks. Once again, none of these
21 issues are mentioned in the RMP.

22 I was shocked to see that the area above the
23 Adobe Badlands, which is actually part of the wilderness
24 study area, was being recommended as an area for potential
25 coal development.

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1 On page 4-63 it states that the mining of
2 coal and the locatable minerals could result in the permanent
3 and irreversible loss of ground water through diversion and
4 subsidence. I think this is completely unacceptable and
5 illegal contrary to the Federal Coal Leasing Program.

6 On oil and gas development I found that the
7 decision of Connors v. Burford was once again ignored.
8 Connors v. Burford says comprehensive analysis of cumulative
9 impacts of several oil and gas activities must be done before
10 a single activity can proceed. Well, there were seven
11 paragraphs dedicated to the impacts of oil and gas
12 development, and one dedicated to the cumulative impacts of
13 that development. I find that totally inadequate.

14 Connors v. Burford talked of the role of the
15 federal agency in the mismanagement of the oil and gas
16 leasing system and stated that they have initiated a pattern
17 of procrastination, not examination, of environmental
18 concerns. And I think it's sought now in being included in
19 the Resource Management Plan.

20 In fact, it's amazing to see what actually is
21 being leased in the plan. The no leasing, only 20,100 acres
22 was recommended for no leasing, which was the Gunnison Gorge
23 Wilderness Study Area. And then the rest of it was all
24 geared to leasing and some of it with some small
25 stipulations. But really very little evaluation of coal

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1 leasing was done in the plan.

2 I was also concerned about some of the tracts
3 slated for disposal. There were sites within the middle of a
4 large BLM tract of land in the Adobes outside of Montrose,
5 and I question the disposal of that piece of land.

6 Under the specific management prescriptions,
7 I think under the D-6 prescription which is a Wilderness
8 Prescription for Gunnison Gorge, that we need to look at
9 acquisition of private land in Red Canyon.

10 Under the D-9 prescription, the plan is
11 supposed to address the site specifics of coal development on
12 riparian and aquatic systems as required by the Secretarial
13 Issue Document, and it hasn't.

14 Under the D-10 we oppose the proposed ski
15 area on Storm King Mountain. No timber harvesting should
16 take place either because of the importance of the area as an
17 elk calving ground.

18 D-12 prescription is the Escalante ACRC. We
19 support stronger restrictions or stronger restrictions need
20 to be placed on livestock. In fact, we support an outright
21 ban on livestock grazing in the small ACRC. We support a
22 mineral withdrawal for hardrock minerals and no surface
23 occupancy stipulation for oil and gas. Recreational uses
24 should also be controlled, including a ban on hunting and
25 some control on the bathing that occurs in the pools of

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1 Escalante Creek to protect the resources there.

2 On the Fairview R and A, once again we
3 support a livestock ban, a mineral withdrawal for the unit,
4 and no surface occupancy for the oil and gas leasing.

5 The D-14 prescription, which is the Heedle
6 Rock Outstanding Natural Area, I think the BLM should look at
7 acquisition of additional lands to improve interpretive
8 opportunities of the unit and consider also a potential
9 nature trail at the site.

10 On wilderness, we support all three units as
11 wilderness. The Gunnison Gorge is one of the premier
12 recreational places in Colorado. The 77givers??? from Black
13 Canyon by having an upper canyon covered by sedimentary rocks
14 which the Black Canyon lacks. The Gunnison River is also an
15 incredible white water adventure, and it's an area that just
16 recently I have gone with Jerry Mallett and visited and found
17 it to be incredibly impressive. Adobe Badlands has
18 impressive scenic values. It includes some endangered
19 species including the Cintah Basin hookless cactus, and it
20 would add, I think, some diversity to Delta's economy by
21 increasing the recreational attractiveness of Delta.

22 On Camel Back, it's another area I've spent
23 some time visiting and found the canyon to be spectacular and
24 much different from Dominguez. Dominguez is the Entrada
25 sandstone and the slip rock canyon very typical of Utah. And

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Dominguez or the Casel Back Unit in Houbiudeau Canyon just barely begins cutting into the Entrada and includes the upper layers of the ???sares?? and I think it's capped with the Dakota sandstone. So it's a much different unit than Dominguez Canyon area.

It also has a very decent trail system for people that want to use it for recreation which very few of the BLM units have. It has impressive riparian areas and Winter Mesa is one of the prime locations for the spineless hedgehog cactus. The BLM plan also looks at the possibility of introducing desert big horn sheep into the area.

I was shocked with the figure that 82 percent of the resource area is going to be open to ORV use, basically uncontrolled ORV use, and think that there needs to be additional restrictions put on that.

I saw no delineation of utility corridors across the BLM lands and those units, and I think that's something that needs to be addressed in the final EIS.

On threatened and endangered species, I think it should also be recommend in that area that an intensive survey and identification of areas which contain threatened and endangered species should be conducted. There's been no such survey yet on the resource area and it's something that's necessary.

And, finally, riparian vegetation, I found

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some very different figures on page 2-8. It says the riparian acreage of the resource area equals 1,035 acres. And then on page 4-30 intensively managed -- they plan on intensively managing 6,320 acres of riparian zone to improve the vegetational characteristics, and then 4,000 acres will be open to mineral exploration. The numbers just don't jive.

There has to be very strict controls placed on both mineral and livestock uses in the riparian zones of the plan that we support. Very stringent controls on both of those.

I thank you very much for the opportunity to testify.

MR. SINGLAUB: Thank you, Kirk.

I'd like to thank all of you for coming out this evening and taking the time out of your schedules to give us these comments. I hereby conclude the meeting. (Whereupon, the above-entitled matter was concluded.)

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CERTIFICATE

This is to certify that the attached proceedings before:
BUREAU OF LAND MANAGEMENT

In the matter of: UNCOMPAGNE BASIN
RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL
IMPACT STUDY

At Lakewood, Colorado, Date September 24, 1987.

Was held as herein appears, and that this is the original transcript thereof for the file of the Department.

OFFICIAL RESPONSE

PUBLIC HEARING TO RECEIVE INFORMATION AND COMMENTS ON THE AGENCY OF THE DRAFT UNCOMPAGNE BASIN RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, AND THE ACCOMPANYING WILDERNESS TECHNICAL SUPPLEMENT

BUREAU OF LAND MANAGEMENT
2465 South Townsend Avenue
Montrose, Colorado
September 29, 1987
7:40 p.m.

JOHN SINGLAUB, PRESIDING OFFICER



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1 who did not get a chance to ask questions prior to the
2 hearing that the BLM staff will be available for informal
3 questions and answers after the hearing.

4 Are there any elected representatives or officials
5 of Federal, State or Local agencies who wish to testify at
6 this hearing?

7 If not, we will proceed through the list of
8 speakers.

9 Deborah Gore. If you will please step up to the
10 podium and state your name, address and who you represent.

11 DEBORAH GORE: Would it be possible to put my
12 name at the end of the list?

13 JOHN SINGLAUS: Sure.

14 DEBORAH GORE: I prefer not to start it.

15 JOHN SINGLAUS: Okay, Richard Gore.

16 [Laughter.]

17 We have got a lot of Gores on this list.

18 RICHARD GORE: I'd rather wait until later.

19 JOHN SINGLAUS: Kenneth Gray.

20 Could I ask you to come up to the podium and
21 state your name and address and who you represent, please,
22 if anyone.

23 KENNETH GRAY: I'm Kenneth Gray, I'm a permittee
24 on the BLM and Forest. I don't have much to say that hasn't
25 been said over and over, but when you cut the use of the

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1 riparian area to what they call 35 percent, I understand,
2 you can't use the outlying areas hardly at all because by
3 the time that you get that much eat up, they won't have
4 gone back at all into the far reaches of the permit and
5 the dry ridges.

6 And that's about all I have to say.

7 JOHN SINGLAUS: Thank you.

8 Thomas Gore.

9 THOMAS GORE: My name is Melvin Thomas Gore, I'm
10 an avid hunter, fisherman and general rubberneck, I like
11 the scenery.

12 My statement is that in general I favor the
13 current management alternatives with an exception, which I'll
14 mention in a moment, and in specific I am in favor of the
15 no wilderness alternative for the Camel Back wilderness
16 study area.

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17 The exception that I have is that off-road vehicles
18 use should be curbed to designated roads only no matter what
19 plan is chosen. And my feeling of it is that off-road
20 vehicles increase destruction of vegetation and thereby
21 stimulate more soil erosion, and as a side point, salinity.
22 And finally because of stress and harassment of wildlife.

23 I think I have been to an area that was public
24 land that there was no restrictions on four wheelers and
25 three wheelers, and I was appalled at the damage.

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1 And finally my statement is that as a recreational
2 user of the public domain, my personal opinion is that all
3 recreational users should be charged a day fee or yearly
4 user fee.

5 As a businessman I know if you give something
6 away it is not appreciated, but if you charge somebody
7 something for it, by golly, they are more likely to take
8 care of it and appreciate what they've got.

9 Hunters, fisherman and peruser of scenery have had
10 a free ride all of these years, and the other interest such
11 as timber and cattle grazing, not only do they pay income
12 taxes, which is what the first thing a recreation user will
13 tell you, I have a right to use this land because I pay
14 income taxes. Well, so does every timberman and so does
15 every rancher, and they have to pay additional fees for
16 what they harvest.

17 So I think that any recreational user should be
18 charged, that way they will appreciate and take care of it
19 more.

20 So in summary, I think that off-road vehicle use
21 should be curbed in all management systems, and the recrea-
22 tional users should be charged.

23 Thank you.

24 JOHN SINGLAUS: Thank you.

25 GENE VECCHIA: One question, Tom. When you talked

1 about curbing ORV use, are you talking about the entire
2 planning area, or just certain specific areas?

3 THOMAS GORE: No, sir, the entire planning area.
4 I am just appalled at the damage these darn things
5 can do.

6 GENE VECCHIA: Thank you.

7 JOHN SINGLAUS: Jo Gore.

8 JO GORE: You're getting rid of the Gores in a
9 hurry here tonight.

10 [Laughter.]

11 Jo Gore, 445 Highway 148 in Delta, I am a permittee.

12 I am opposed to Camel Back used as a wilderness
13 area, recommendation as a wilderness area. The Camel Back
14 does not lend itself as a wilderness area. It certainly
15 would be hard to manage, and it is not -- does not meet
16 all the requirements of the wilderness.

17 Livestock grazing on these lands certainly en-
18 hanced the area; they harvest the grass. When they harvest
19 the grass, they prevent buildup of vegetation that could
20 lead to dangerous fires. We have had a lot of fires in the
21 State this year, so it would certainly get rid of a lot of
22 that danger.

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23 The riparian habitat, where they have proposed
24 that on the Roubideau area, to begin with, I always thought
25 that a riparian habitat had to be in an area where there

1 was water. The Roubideau goes dry and is dry many months
2 out of the year and would not lend itself. Then when they
3 have a hard rain up above, the water comes down, or the
4 floods come down and wash the dry sand and gravel and rock,
5 so the Roubideau should not be into riparian habitat. If
6 it was into a riparian habitat and properly managed, it
7 would increase the AUMs rather than decrease the AUMs as
8 proposed for the area.

9 Livestock have been a great asset to building and
10 reseeding of seeds and grasses. The cactus that they say
11 is in danger of being eliminated because of livestock
12 grazing, the livestock is what spreads the cactus, they
13 step on it and move it and it takes it along to another
14 area and that cactus has increased in that area, there's
15 a lot more of it than there was a few years ago.

16 I would urge you to continue the multiple use
17 management of these lands as they are in use now.

18 I would also like to see the recreationists and
19 the backpackers pay their fair share of use of the public
20 lands. They have had the use of the public lands all of
21 this time, never paid one cent for management. Livestock,
22 mining, timbering do more than pay their way of the use of
23 these lands. And I would certainly like to see the other
24 people using the lands start paying their fair share.

25 Thank you.

1 JOHN SINGLELAUB: Thank you.

2 W. A. HAMILTON.

3 W.A. HAMILTON: I would like at this time to
4 forfeit my time because there are many more livestock men
5 here. If there is still some time at the end I may say
6 something.

7 JOHN SINGLELAUB: Mark Pearson.

8 MARK PEARSON: My name is Mark Pearson, my
9 address is P.O. Box 204, Grand Junction, Colorado, 81502.
10 I am speaking tonight as the Chairman of the Rocky Mountain
11 Chapter of the Sierra Club, which includes 7,800 members
12 in Colorado, among them are approximately 175 members in
13 the Uncompahgre and Gunnison Basin or Gunnison River Basin
14 area. Sierra Club members regularly use the public land
15 of the Uncompahgre Basin resource area, primarily for
16 recreational purposes. For example, we have sponsored
17 outings in recent years to all three of the wilderness
18 study areas; the Gunnison Basin or Gunnison Gorge, Camel
19 Back and Adobe Badlands.

20 The Sierra Club strongly endorses ELM's preferred
21 alternative recommending all of the Gunnison Gorge for
22 wilderness designation. ELM is well familiar with our
23 support of the wilderness designation of the Gunnison Gorge
24 through our participation in the ongoing efforts to fashion
25 the Gunnison Gorge Wild and Scenic River Bill and Wilderness

1 Bill.

2 We are extremely disappointed, however, with ELM's
3 unsuitable wilderness recommendation for Camel Back. The
4 Wilderness Technical Supplement makes clear that there are
5 no significant resource development conflicts with wilder-
6 ness designation of Camel Back. There's no timber or
7 mineral resources of any value present. Instead ELM notes
8 that there is an impressive array of wilderness dependent
9 values in the area, including critical winter range for
10 big game herds, habitat for threatened species, including
11 rare plants and Golden Eagles, and habitat for threatened
12 cactus as well.

13 All of these features, plus a whole bunch of
14 other ones that are obvious to anyone who goes up there,
15 including the spectacular scenery, a pretty substantial
16 perennial stream, the historic site of Ben Lowe's cabin,
17 and other unique features such as the tremendous hoodoo
18 right there below the Camel Back that's made out of uncon-
19 solidated sediments, just capped by a big piece of etrade
20 sandstone. It just towers there without tipping over, which
21 is quite impressive.

22 All this evidence demands that the ELM reconsider
23 its recommendation and find Camel Back suitable for wilder-
24 ness designation. The alternative is the continued, piece-
25 meal erosion of the wilderness qualities there an over

1 increasing pressures are put on by more and more ORV users,
2 by fuelwood cutters, and other sorts of motorized activities.

3 Camel Back also because of its seven or eight mile
4 stretch of Roubideau Creek offers an unparalleled opportunity
5 on the Uncompahgre Plateau to protect a significant stretch
6 of what is probably the longest undeveloped drainage on the
7 entire plateau. The creek starts in the aspen and spruce
8 way up on the divide of the plateau and overflows a roadless
9 continuum all the way from the divide far down into the
10 dry desert of the Gunnison River country.

11 We also, the Sierra Club also supports the Adobe
12 Badlands for wilderness designation. As with Camel Back,
13 there are no substantial reasons given in the Wilderness
14 Technical Supplement for ELM's non-suitable recommendation.
15 ELM seems not to appreciate the Badlands wilderness, given
16 the fact that the Montrose District did not recommend
17 McKenna Peak for wilderness, either, when it has the oppor-
18 tunity.

19 Finally, we urge the ELM to reject the proposed
20 Storm King mountain ski area in this land use plan. The
21 RMP's proposal to place the ski area proposal in administra-
22 tive limbo, neither outright approving or denying the
23 proposed ski area, is a silly non-decision. The reason for
24 writing the resource management plan in the first place was
25 to provide some guidance to ELM managers for evaluating

1 resource conflicts and to allocate resources based on the
2 analysis of those conflicts.

3 So the RMP should make a decision about whether
4 Storm King Mountain is better suited for a ski area or for
5 elk calving habitat, and by avoiding making that decision
6 the BLM has kind of missed the point, it seems of the land
7 use planning process in the RMP.

8 So in this case we would encourage the BLM to
9 deny the Storm King ski area on the basis of a lack of
10 demonstrable need for an additional commercial ski area in
11 the area, the lack of demonstrable financial capacity of
12 the proponent, and due to the impacts it would have on the
13 big game herds in the area.

14 The Sierra Club will be submitting in-depth
15 comments on these issues here and a bunch of other ones in
16 the RMP before the November the 5th deadline.

17 Thank you for your attention.

18 JOHN SINGLAUB: Thank you, Mark.

19 Hank Davis.

20 HANK DAVIS: I would like to wait until later to
21 make a statement.

22 JOHN SINGLAUB: Sure.

23 Eleanor Walrod.

24 ELEANOR WALROD: I'll wait for the question and
25 answer session.

1 JOHN SINGLAUB: It's either Les or Lee Hamilton.

2 LES HAMILTON: My name is Les Hamilton, my address
3 is Post Office Box 764, Delta, Colorado. I represent the
4 Uncompahgre Cattle Company, which has a permit that borders
5 a portion of the Camel Back wilderness area. A couple of
6 things that I would like to bring to the attention of the
7 BLM is I was down through the area that you want to designate
8 a riparian the other day, the creek was dry in several
9 places down through there. It was mostly just potholes at
10 that time.

11 I had occasion to ride through an area that has
12 not -- has been taken away from access from livestock for
13 the last few years, and the fire danger down that area from
14 Criswell Creek up, I would estimate, would be in the extreme
15 category. It is very dry and it's very overgrown.

16 I think that the Camel Back wilderness area,
17 proposed wilderness area should be designated as multiple-
18 use area, that we should continue with the permits the way
19 they are. There is ample room and ample resources for both
20 the recreationists, the wilderness appreciators and the
21 multiple users presently using that at the present time.

22 The cattle will not come in and use 35 percent of
23 the forage and be able to utilize any of the outlying areas,
24 as Mr. Gray said. They will come in there and by the time
25 they use that 35 percent, they will not have been able to do

1 back into the country and utilize any of that at all. So I
2 urge the BLM to just continue with it the way that it is.

3 Thank you.

4 JOHN MUSSER.

5 JOHN MUSSER: John Musser, 704 650 Road, Delta,
6 Colorado. I'm a rancher. My family has been on that ranch
7 for four generations. I think you find most of the ranches
8 in the room, the families have been on those ranches for
9 two or three or four generations.

10 When you talk about taking away livestock permits,
11 or cutting to 35 percent use, you're talking about taking
12 away a lot of heritage of the area. You're talking about
13 taking away some income that comes into the area both to
14 the BLM in terms of grazing fees and to the economy of the
15 area in general.

16 I'm saddened that in nearly all of these alterna-
17 tives it is recommended that livestock use be either out or
18 curtailed. I recently attended a seminar on holistic
19 resource management along with several of the BLM employees.
20 I'm sorry to say that those that probably should have
21 attended did not.

22 It appears as though for several years now we have
23 been going the wrong direction. We need to increase live-
24 stock use with intensive management rather than decreasing
25 livestock use to get the ground cover that we need in those

1 areas, and especially the riparian areas.

2 I've invited several BLM employees, and none of
3 them have accepted my invitation to show them areas in the
4 Escalante Canyon and the Little Dominguez that have had
5 basically no livestock use for many years now and they
6 continue to deteriorate. They're growing up with sagebrush
7 that's too big for deer or elk habitat and they constitute
8 a fire hazard, I think.

9 But worse than that, those areas that have not
10 had any livestock use show by far more erosion than those
11 areas that are overused. And I'll admit that there are
12 areas that are overused. I mean, anybody can see that.

13 But I think that we need to take a long, hard
14 look at our thinking. There is evidence now that shows
15 that it's not over -- well, I can't say not overuse, but
16 that over, over rest can be just as detrimental to the
17 vegetation as overuse.

18 I just really urge the BLM to really take a long,
19 hard look at this idea that in order to improve vegetation
20 that you have to curtail livestock grazing, because I think
21 we are going the wrong way. I think what we have done in
22 the last 20 or 30 years shows that.

23 I will have more written statement, thank you.

24 JOHN SINGLAUB: Thank you, Jim.

25 M. W. Rule.

WALTER RULE: My name is Walter Rule, Box 67, Ouray. I'm a member of OCA, which is an Oouray County Alliance that's involved with environmental and consumer oriented affairs.

I'm not speaking for the group, the group has not met or issued a position on this particular plan at present.

My comments will be limited mostly to the wilderness proposal and Storm King, although the management philosophies expressed about those areas can and does apply as a whole to the Uncompahgre Basin.

I spent approximately ten years in this area from the late 60's through the late 70's as a public land manager myself. I'm familiar with the areas and the values and the issues that are concerned here with all of the groups that have spoken.

We returned about ten years ago to the Oouray area and I'm retired there now and I've listened with quite a bit of interest here to the people like the Gores and Nussers and others that show a real concern for the land.

The ONV situation is something I think you really need to get a handle on in this area before it becomes worse than it presently is.

The history of public land in the West is principally guided by the need of the people who live here and the country as a whole. Timber, minerals, grazing and water

have always been major concerns of the people in this area, both for their own livelihood as well as basic resources for the country.

In the past two decades in the United States, however, what we call wildlands have undergone a little bit different viewpoint. People began to realize that there is a little bit more to our wildlands than what we can extract from them monetarily. There is a realization that the private lands that we have that have these values now have largely lost those values, and that the public lands; the national forests, park and BLM managed lands are the last repository of what might be called reservoirs of environmental quality. Qualities that no longer exist in many of the other areas, they are places of refuge not only for wildlife, but for people who get tired of the pressure of the technological world and are mesmerized by machinery and everything else. They want to get away and can't get away. They want to know that there are places they might be able to go to if they wanted to.

Consequently, the PCO-orientation of the commercial idea about resource values, timber, minerals and grazing, and even water to a degree, has changed. And with the possible exception of water, upon which most of the other resources depend, the other values have declined in terms of much of the public feeling about where the values are.

There's a feeling that we need to retain the few remaining reservoirs of environmental quality in the United States as a whole, and this has emerged as a growing, if not a dominant, need.

In the case of water, which is so necessary for agriculture and industry outside the public lands, where it often rises out here, the mining, grazing and timbering may represent a real threat to the quality and quantity of that water.

For those of you with concerns, and with this value structure, the so called wilderness system seems to be the only avenue to assure even a short-term solution to the historic exploration -- exploitation, rather.

Appropriately, the Federal agencies have offered wilderness as an alternative, especially since their management procrastination and practices over the years have demonstrated, unfortunately that the quality of the forest and grazing land and the mineral resources, the protection of those, has been marginal, at best.

It's not surprising then that the wilderness alternative is perhaps the best alternative for all of us. In some respect it's a refuge for the agencies. With the strong political and economic pressures they get to use and develop the land, the wilderness classification, which can only be changed by Congress, takes the pressure off of them

in terms of that kind of development.

For the units involved in the Uncompahgre Basin, the wilderness study and the economic losses that might occur in timber, minerals and grazing are important to certain individuals, and some of you who have been on the land for many years. When they are added in total, they are a very small part, and might be called minimal.

The potential positive effect on wildlife and water, for the protection that wilderness might give them under the present system, could be very significant in the long run. It seems only practical, logical and resource-wise then to provide and to propose the Camel Back, Adobe wilderness study areas be added to the Hunnison Gorge in wilderness classification.

A brief word about Storm King. The same rationale applies to Storm King.

JOHN SINGLEAUB: Five minutes, Mr. Rule.

WALTER RULE: I'll finish up in about three seconds.

JOHN SINGLEAUB: Please.

WALTER RULE: Colorado already has enough economically marginal ski areas. The elk herd and wildlife habitat in this Storm King area in the long run is a lot larger and greater value to all of us than a ski area which might be very short term and an economic disaster. We should

1 capitalize on the natural resources that we have that are
2 in their existing form and not look for short-term answers
3 of exploitive nature for the potential of what we have got.

4 Thank you.

5 JOHN SINGLAUB: Thank you.

6 I apologize if I mispronounce your name, some of
7 these are hard to read. Linda Delmar.

8 LINDA DELMAN: Closs.

9 JOHN SINGLAUB: You know who you are.

10 LINDA DELMAN: My name is Linda Delman, D-e-l-m-a-n.
11 I live at 1317 Avon Drive in Montrose. I'm hear soaking for
12 myself.

13 I would like to say that I'm pleased that Gunnison
14 Gorge was designated as a wilderness area worthy of wilder-
15 ness designation, but I would also like to say that I am
16 disappointed that Camel Back was not and that Adobe Badlands
17 was not. I noted, as well as some of the other speakers,
18 that there was -- there seems to be no significant conflict
19 with timber resources or mineral resource development in
20 those areas, and I think that the values that are there in
21 terms of scenic values and opportunity for solitude, which
22 I think is becoming much more needed as our society grows,
23 and wildlife habitat, and the cultural resources there in
24 those areas make them eminently suitable for wilderness
25 designation.

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1 In terms of cultural resources, I'm a member of
2 the archeological society and I have spent a good deal of time
3 on the Uncompahgre Plateau, and I'm aware that there are
4 lots of cultural resources out there, most of which haven't
5 been surveyed, but I come across evidence all the time. And
6 I think that in particular archeological sites are subject to
7 more damage and degradation in areas where there are --
8 where there is a lot of motorized travel, because it makes
9 the access easier, and there is just more people up there.

10 And I think that it would be a wonderful opportunity
11 to preserve some of these archeological sites, or at least
12 mitigate the damages. If we had more of these wilderness
13 areas in this kind of environment, like Adobe Badlands and
14 Camel Back, because with the lack of motorized vehicles I
15 think we have an opportunity to at least preserve what's
16 there long enough to survey and see what it is.

17 In closing I would like to say that I also am a
18 skier and I am opposed to the Storm King ski area develop-
19 ment. I think that the elk habitat and the elk calving
20 grounds are much more important to us in the long run than
21 another ski area.

22 That's all.

23 JOHN SINGLAUB: Thank you.

24 Bill Harris.

25 BILL HARRIS: My name is Bill Harris, I live at

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1 1605 South Mesa in Montrose.

2 I'm Vice President of the Colorado Archeological
3 Society, and I'm speaking for the Chipeta Chapter of the
4 Colorado Archeological Society which is based in Montrose.
5 The Chapter is 52 years old.

6 The rate of destruction of the archeological
7 resources on BLM lands in the Uncompahgre Basin is alarming.
8 Vandals have laid open most of the rock shelters, and many
9 of the surface sites that contain valuable information about
10 the basin prehistory. Many historic sites have been picked
11 clean and/or been destroyed also.

12 If the current trend of destruction is not re-
13 versed, there will be precious little cultural resources
14 to provide enjoyment to the public and undisturbed sites
15 for scientific investigation in the future.

16 The Chipeta Chapter of CAS recognizes that the cultural
17 manpower and budgetary constraints placed on the BLM cultural
18 resource managers effectively reduces the quality and the
19 quantity of cultural resource protection. But the ultimate
20 result of this destruction is also unacceptable and unthink-
21 able. Strategies must be developed and implemented that
22 reverse the current destructive trend.

23 I have some suggestions. The use of available
24 data has a baseline resource for protective strategies. For
25 example, a survey -- there's a publication put out by the

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1 BLM called Cultural Resources Series No. 11, it's entitled
2 the survey of vandalism to archeological resources in South-
3 western Colorado by Mickens, Loraldy and Tucker. This
4 particular volume gave a good overview of vandalism and
5 what could possibly be done to stop it.

6 My second suggestion is to identify high sight
7 density areas to search out archeological resources in areas
8 that have received little attention. For example, low
9 sight density areas, places of low profile, benches over-
10 looking major drainages, and areas covered by fluvial
11 deposits.

12 Emphasis should also be towards protection of un-
13 disturbed sites and mitigation of sites that have been
14 disturbed, but have a high potential for recoverable
15 material.

16 My third suggestion is in the area of public educa-
17 tion. The BLM should implement a more progressive public
18 education program that emphasizes the vandalism problem and
19 the need to protect and conserve cultural resources.

20 The Colorado Archeological Society recognizes the
21 only long term solution to vandalism of cultural resources
22 on public lands is public education, and has recently
23 elevated public education to a committee responsible to a
24 State Board of Directors. This committee, among its other
25 activities, will work closely with Colorado -- will work

1 closely with the Colorado Office of Archeological and
2 Historic Preservation, and it also looks forward to coopera-
3 tion between other organizations and other agencies. It
4 looks to that as a high priority.

5 The Chipeta Chapter of CAS commends the BLM in
6 regard to its recommendation to the RMP draft, preferred
7 alternate, to conduct a Class III inventory of the 5,840
8 acres.

9 The Chipeta Chapter would also like to recommend
10 that BLM expand their search for high value sites on BLM
11 land between Highway 90 on the east and Roubidoux Creek on
12 the west. High value sites and high density areas should be
13 given long-term protective classification. The RMP should
14 also include provisions for research projects by legitimate,
15 professional and amateur archeological groups.

16 In closing the Chipeta Chapter would like to
17 participate in the BLM's cultural resource management to the
18 extent of its members' physical, temporal, field experience
19 and financial capabilities.

20 Thank you very much.

21 JOHN SINGLAUS: Thank you.

22 Stuart Krebs.

23 STUART KREBS: My name is Stuart Krebs. S-t-u-a-r-t-
24 K-r-e-b-s. My mailing address is Box 776, Montrose,
25 I'd like to start by commending the BLM for its

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1 recommendation that the Gunnison Gorge be considered suit-
2 able for wilderness. I'd also like the BLM to consider the
3 Adobe Badlands, reconsider them as suitable for wilderness,
4 and I intended to also recommend that Camel Back be consid-
5 ered for wilderness too.

6 I wonder if -- I don't remember all of the regula-
7 tions that we heard at the beginning of the meeting, but I
8 wonder if it's appropriate, I'm sure in the documents we
9 have that it tells this, but I'm curious if we could get a
10 little clarification on just what wilderness designation of
11 that area would change in the way of grazing use. Is it
12 okay to look at that real quickly, I'm going to talk --

13 JOHN SINGLAUS: You can talk about that after the
14 meeting, if that would be possible.

15 STUART KREBS: We couldn't use part of my five
16 minutes to --

17 JOHN SINGLAUS: I'd rather not, no, if we can
18 confine this to your testimony I would appreciate it.

19 STUART KREBS: Okay. I guess the last thing that
20 I would like to say is that I would look at that a lot harder
21 and see if there really is a hardship to the grazing per-
22 mites up there. But if there is not, I think that area
23 should be considered for wilderness as well.

24 Thank you.

25 JOHN SINGLAUS: W. D. Wetlaufer.

1 W. D. WETLAUFER: I'm W. D. Wetlaufer, 16574 6450
2 Road in Montrose. I'm representing myself, my fishing and
3 hunting interest and Western Colorado Congress.

4 I'm especially interested in the efforts to create
5 a wild and scenic river in the Gunnison Gorge. The geolog-
6 ical, the environmental, the wildlife and recreational
7 opportunities there are something unusual. For myself
8 that's the thing that's kind of stuck with me when I first
9 came to Colorado from the great State of Texas to make the
10 great State of Colorado even greater. Anything more I can
11 do, I'm here to do it.

12 And I think that the tourist trade in this part
13 of the State is something that people should take advantage
14 of. This is something that doesn't exist every place, and
15 people come through here from the eastern part of the State
16 where they look at the gorge over there, and the Arkansas
17 River where they have to pay to get in. And they come
18 through this area and tear off their stickers after they
19 take a trip up to the Black Canyon National Monument.

20 Thank you very much.

21 JOHN SINGLAUS: Thank you.

22 GENE VECCHIA: Can I ask a clarifying question of
23 Mr. Wetlaufer.

24 W. D. WETLAUFER: Yes, sir.

25 GENE VECCHIA: Are you saying that you are

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1 recommending wild and scenic designation, or wilderness
2 designation, I didn't quite get the idea behind your talk.

3 W. D. WETLAUFER: Both.

4 GENE VECCHIA: Both?

5 W. D. WETLAUFER: Yes, sir.

6 JOHN SINGLAUS: John Baldus.

7 JOHN BALDUS: My name is John Baldus, I live at
8 630 North First Street in Montrose. I am the President of
9 the Uncompaghe Valley Association, which is a Montrose
10 based consumer and conservation group, and Vice President
11 of the Western Colorado Congress, which is a similar group
12 spread across the Western Slope. I'm representing the
13 opinions of a large number of our membership.

14 We have several concerns about the RMP. One of
15 our major concerns is the increase in the amount of coal
16 leasing, almost a four-fold increase appears to us to be
17 encouraging speculation in the coal leasing industry, but
18 not enhancing development of the coal industry itself of
19 coal production. We feel that this might very well be
20 detrimental to the other resources of concern in the area.

21 We are also concerned about the allowing of coal
22 leasing, oil and gas leasing, locatable minerals leasing,
23 mineral materials leasing in the bronosed resource research
24 natural areas, and the areas of critical environmental con-
25 cern. There's no reason to allow leasing in these areas,

it would only be detrimental to the resource that supposedly is being protected by designation of RNA and ACECs.

Another concern is livestock grazing in these ACECs and RNAs. Livestock grazing also should be very carefully looked at in areas of winter range for deer and elk, partly because it produces an adverse effect on the very people who use those grazing areas when these wildlife are forced into the private land to find forage in the winter. The Division of Wildlife pays out a fairly large amount every year in damages to crops that are partially a result of improper management of grazing allotments.

Concerning the ski area proposal and Storm King Peak, we rather resent the fact that the ski area was proposed as part of a conservation alternative. This is not conservation. We would very strongly recommend that the BLM consider the other resources in balance with the demand for recreation and the unlikelihood of actual development of the ski area.

We also would like the BLM to be very careful in considering its land tenure adjustments. The land tracts proposed for disposal often times are important habitats for both game and non-game species of wildlife, as well as plant life, and we need more looks at the situation from the wildlife biologists within the agency, and at the same time we would like to recommend that the budget for a wildlife

biology staff be increased rather than decreased as it has been in recent history.

Concerning the environmental impact statement that is included, or considered as part of this document, we find that the EIS, so called, is vague and incomplete to the point of being useless.

I might give you just a couple of most glaring examples, which are on page 50 of chapter 4, where impact on riparian zones from mineral resources management, it states that road construction, facility development, dredging operations, and other surface-disturbing activities in riparian zones would remove riparian vegetation, compact the soil, and could redirect subsurface water. There is no quantification whatsoever of the results of this development and it mentions only these activities within the riparian zones, which these activities should not be occurring in the riparian zones in the first place. We assume that they would be occurring outside the riparian zones, and the impact in the riparian zones need to be quantified.

Once again, on page 51, chapter 4, impacts from livestock grazing management. Some localized disturbance and destruction of individual threatened and endangered plants would occur due to livestock trampling. Some disturbance. This is hardly sufficient for the public to judge, or for any other agency to judge whether these things

are harmful or should be recommended.

Page 52, chapter 4, habitat, impacts from disposal of public lands. Habitat suitable for and used by whooping cranes and greater sandhill cranes would be lost if disposal of public lands around the Fruitgrowers, Crawford and Gould Reservoirs occurs. This is a very serious concern. These are endangered species and by Federal law should be protected to the maximum possible that the agency can manage. And to dispose of these when they are clearly habitats for threatened or endangered species seems very foolish.

JOHN SINGLAUB: Five minutes.

JOHN BALDUS: Okay. I'll continue my remarks with written statements.

Thank you.

JOHN SINGLAUB: Thank you.

JOHN RIEL: One question that I would have, John. You made the statement that the BLM should be careful in their land tenure adjustments, that it could be detrimental to wildlife, are you thinking of any particular areas when you make that remark?

JOHN BALDUS: Well, particularly the most important example, I think, is the tract around the reservoirs that I just mentioned: the Crawford Reservoir, the Gould Reservoir. If that is whooping crane habitat, then the wildlife biologists should never have allowed you to

Consider even disposal of those tracts.

JOHN RIEL: Thank you.

JOHN SINGLAUB: Dave Seymour.

DAVE SEYMOUR: I'm Dave Seymour, I represent the Uncompahgre Livestock Association, my address is 8267 5700, Olatha.

As I sit here this evening, and of course I see quite a few of my neighbors and acquaintances in the audience here, do business with a lot of them. But I go back and I think that this process of evaluation of environmental resources, and resource development didn't exactly start in this century, but it got a real big boost back in the 30's when they put in the Taylor Grazing Act. And I think everybody here that has a ranch can remember back that far realizes that we have come an awful long way since we put in the Taylor Grazing Act.

I think this evening as we sit and look at this we ought to realize that we have come a long way and an awful lot of the things we have here to discuss; whether it be wildlife, whether it be resources, whether it be increased water usage, a lot of these things have come because we, as mankind, have developed them. The wildlife that you see out here and take for granted, that you see in all these wilderness areas don't just happen there, they have been propagated and they have been enhanced through

1 mankind's use.

2 And I believe that as we sit here this evening
3 and look at this thing that we can do down the road and
4 continue to enhance these values, continue to enhance wild-
5 life, continue to enhance grazing and to continue to enhance
6 their values if we work together and if we keep in step with
7 each other.

8 I believe as a representative of the Uncompagbre
9 Livestock Association that we are in favor of the status quo
10 of the management as it is, and I'd like to take comment
11 from Tom Gore and Mrs. Gore, too.

12 There should be an awful lot tighter control on
13 off-road vehicle use. I believe that anybody that's been
14 out in the wilderness and been out in the public lands,
15 wilderness areas included, realizes that there's a great
16 deal of use from off-road vehicles, and any person that's
17 a permittee, or any person that uses that land realizes that.

18 And I think one point that should be made, one
19 point that we, as BLM and as a public should get a hold of,
20 is off-road vehicle use and we ought to increase the quality
21 of the visitation to these lands.

22 I had an opportunity today to talk to a gentleman
23 who is directly -- well, he borders, his property borders
24 two wilderness areas in the Upper Gunnison Basin, and he
25 says some of the most destructive visitors that they will get

1 on those wilderness areas, which is part of his grazing
2 permit, are people that come in just to look at the scenery,
3 to walk around to have a visual experience, maybe to camp,
4 but they are some of the most destructive, they leave more
5 trash and more visible disturbance than anybody that they
6 can put out there.

7 So I guess as a representative of the Uncompagbre
8 Livestock Association and Cattlemen's Association, we would
9 like to encourage that there be at least no reduced grazing,
10 that there be grazing as a status quo, and we believe as
11 professional organizations that grazing enhances the values
12 that are already there and enhances wildlife. And we
13 believe that by working together with the public that we
14 can enhance values that are already present, and increase
15 those values that are already there.

16 Thank you.

17 JOHN SINGLAUS: Thank you.

18 Yvonne, has anyone else signed in to speak?

19 YVONNE SMITH: No.

20 JOHN SINGLAUS: We will go back to the beginning
21 and give an opportunity to those who deferred to the end.

22 Deborah Gore.

23 DEBORAH GORE: My name is Deborah Gore, I reside
24 in Olathe, Colorado, and I am a permittee.

25 I hadn't prepared a written statement to read

1 tonight at all. I planned to give a detailed statement
2 later in the mail, but I think a few issues need to be
3 brought up tonight pertaining to what I've heard here from
4 the other concerned citizens.

5 My husband and I are of the third generation who
6 have used in the area of Camel Back and Roubideau Creek
7 grazing. And I'd liken it to anyone who looks back at
8 their childhood home, there is no place that you would
9 rather protect and rather see continued in the way you have
10 always known it.

11 I'm nervous.

12 Anyway, it is my childhood home, the Roubideau
13 Canyon and Camel Back area, the Ben Low place. And we have
14 known of it from the beginning of time, and I don't want to
15 see it change.

16 But, here again, I do not think it is wilderness,
17 has wilderness suitability. It has a quality to it that I
18 love, but partly because I grew up with it. It has beauty,
19 it has geology features that are very attractive. But it
20 also has severities. It has extreme runoff in the spring,
21 flash flood danger. He has miserable, hot, summer days with
22 gnats. And it can have freezing hail storms in the middle
23 of June. But this country right now, and as it always has
24 been, is used for grazing. And in the books it states a
25 reduction of 35 percent in riparian zones, and it is talking

1 of a 200 ADM cut in this very area. And in our position as
2 ranches we can't tolerate that. We don't feel that the 35
3 percent has any substantial documentation that would prove
4 that it would help, and we feel that the 200 ADMs is ri-
5 diculous. Any of you who have walked the Creek, walked
6 the Camel Back area, the Windy Mesa area, I'm sure you have
7 noticed that there is feed out there and there is feed for
8 your deer and your wintering elk and the cattle.

9 And what you see out there is not just what just hap-
10 pened, like Dave Seymour said, is not just what happened
11 right now, it's what has happened since the beginning of
12 cattle grazing out there.

13 And I feel that grazing can enhance it.

14 And that's basically my position on what's been
15 said tonight, is that it isn't suitable for wilderness,
16 but since it hasn't changed in several hundred years, I
17 don't think it's going to in the near future. And I'd
18 like to see it stay the way it is and managed in the current
19 management. And any rest of my comments will be in the
20 mail.

21 JOHN SINGLAUS: Great. Thank you.

22 Richard Gore.

23 RICHARD GORE: My name is Richard Gore from
24 Olathe, Colorado, and I'm the third generation in here
25 ranching. And, in fact, I've spent all my life in Roubideau

1 Canyon and the Roubidoux area and right on up there to our
2 forest permit is how we operate our cattle. And it's just
3 the backbone of how we get there and get to our forest.
4 And I'm really upset about the 35 percent limited use on
5 the riparian, and the 200 ADUs, that would just mean the
6 drift over of our cattle to get to our summer grazing where
7 we spend four and a half months. And we are not really there
8 that much on the BLM, probably about two months at the most.
9 And it would really hurt us.

10 Then cattle generate a lot of income and stuff
11 for the towns of Delta and Montrose. And things got tough,
12 why, Delta pretty much went under because of the farmers
13 and stuff couldn't make it and lots and lots of my neighbors
14 went under, and I happen to be one that's hanging on. And
15 I'm just not in favor of that, or that wilderness program.

16 Right now everybody can come and go on the Federal
17 land like they want. There's nothing stopping them from
18 using them right now, and the cattlemen and sheepsman aren't
19 there to rape the land, they are there to work with the BLM
20 and improve things. And I enjoy and look forward to working
21 with the BLM, getting ponds on these dry mesas and stuff
22 to help the wildlife and cattle and sheen.

23 And just by working together we can whip this
24 thing, but just one use just don't work, because I've been
25 to several of these demonstration allotments lately and it

1 proved that everything can work in together.

2 And I'm definitely not in favor of dumping these
3 wild sheep in the riparian zone when they are already
4 calling them overused, and the water values and stuff, I
5 think it would just be detrimental.

6 Then basically that's what I have to say, and I
7 think we can work together and whip this thing.

8 JOHN SINGLAUB: Thank you.

9 W. A. Hamilton.

10 W. A. HAMILTON: My name is really Bill Hamilton,
11 573 Highway 65, Cedaredge. I've lived right in this
12 locality for over 70 years, been a stockman most of my life,
13 and I'd like to say that the stockman enjoys the wildlife,
14 the birds and the trees about as much as anyone I know of.
15 And I believe they're just as good an environmentalist
16 as anyone in the country.

17 As a boy growing up I enjoyed the wildlife. I
18 was nearly 12 years old before I saw a deer right in this
19 country. And they was very few for many, many years. It
20 didn't have a season for years.

21 They then, through protection of the deer, they
22 grew very rapidly and in the 1950's you could get a license
23 and kill about as many deer as you wanted, two, three does
24 and a buck.

25 I can remember as a boy riding in on the BLM and

1 Forest, I don't believe there was a bit more feed in those
2 days than there is right out there today.

3 I see quite a lot of -- we have a permit on the
4 Uncompahgre and I see quite a lot of deer up there in the
5 summer, but I don't see near as many nice, big bucks as I
6 do down here on the river on the private ground. So I
7 think that -- I think most of that land people will let you
8 hunt, or maybe they feed in the winter more than they do in
9 the summer, but that's where the big bucks are, most of them
10 are on the private ground.

11 I think that through working together that most
12 of all these things can be worked out. I know that there is
13 many places that I'd much rather lay down and take a drink
14 out of the stream where there has been wildlife and cattle
15 and sheep than I would where there has been too many people
16 walking around and spending a day or two.

17 I think that's about all I have to say. Thank
18 you.

19 JOHN SINGLAUB: Thank you.

20 Hank Davis.

21 HANK DAVIS: I'll make a written statement.

22 JOHN SINGLAUB: Eleanor Walrod.

23 ELEANOR WALROD: I'm waiting for the questions and
24 answer period.

25 JOHN SINGLAUB: Okay. Is there anyone that did

1 not sign up who would like to speak this evening?

2 HERSCHEL BUD BURGESS: I was late getting here,
3 I would just like to make a few comments on just what was
4 said tonight.

5 JOHN SINGLAUB: Would you come up here and state
6 your name and address and who you represent, if anyone, and
7 I'll ask you to sign this when you finish.

8 HERSCHEL BUD BURGESS: All right. I'm known to
9 most as Bud Burgess. My address is 2380 N Road, Eckert,
10 Colorado.

11 I've listened with interest to a lot of the state-
12 ments made here tonight, and there's a lot of concern with
13 this public land.

14 One of my questions is why is this land what it
15 is today. Who developed it. And I think you will go back
16 and listen to what some of these livestock people have said,
17 a lot of the land was developed by the livestock people.
18 They're what made it what it is today.

19 Most of the damage that has come is from the
20 people, your four-wheel vehicles, and we've got these three-
21 wheel vehicles and now we've got these little four-wheelers
22 and two-wheel bikes. There's where your damage is coming
23 from. I can take you places on the Forest and the BLM and
24 show you where we get a lot of the damage from these little
25 vehicles today.

1 The gentleman from Texas alluded to the quality
2 of the Gunnison. Now many of you remember when you could
3 walk down the Slack Canyon and couldn't see the water between
4 the waterholes. Now many of you people were in this area
5 at that time.

6 What has made the Gunnison River what it is is
7 the development on the Gunnison River.

8 Wildlife and livestock, as Mr. Hamilton alluded to
9 is very compatible. A lot of old timers around the turn of
10 the century will tell you about how few the deer were in
11 this country.

12 And look at the problems we have got today. Why
13 are those problems here today. A lot of my reasoning of why
14 these problems are here today are because of mismanagement
15 of the deer. These deer are harassed from the first of
16 August until the middle of January. Down in these river-
17 bottoms it was a rare occasion to see a deer 20 years ago.
18 Now we have a lot of resident deer.

19 So if the people really want to look at the facts
20 of what they want is water management, wildlife management,
21 look at where the real problem is, not try to lay the blame
22 on something that is not the problem, which a lot of times
23 is not.

24 Thank you.

25 JOHN SINGLAUB: Thank you.

125

1 Do we have other speakers?

2 Do we have another speaker?

3 BILL HARRISON: John, could I add something to
4 something I already said?

5 JOHN SINGLAUB: Just a minute after I give an
6 opportunity to those people that I cut off.

7 Mr. Rule, would you like to add anything to what
8 you said?

9 W. W. RULE: No.

10 JOHN SINGLAUB: Mr. Baldus, would you like to
11 add anything to what you said?

12 JOHN BALDUS: No, I don't want to keep you all
13 here until midnight.

14 JOHN SINGLAUB: Mr. Harris?

15 BILL HARRIS: One thing that's been commented
16 on a few times tonight that I would like to --

17 JOHN SINGLAUB: This isn't an opportunity for
18 rebuttal.

19 BILL HARRIS: This is a continuation of my state-
20 ment, something that I didn't touch upon in my statement.

21 There has been some comments made about off-road
22 vehicles. It is my experience, and I think the experience
23 of a lot of people that are involved with cultural resources
24 management that the use of off-road vehicles has a detrimen-
25 tal affect on cultural resources. Not only on the sites

1 themselves, but also it provides an opportunity for vandals
2 and people who like to go digging, and that sort of thing,
3 to destroy sites, it provides them a means of getting some
4 place easily.

5 The soil is damaged by these vehicles to the point
6 where erosion occurs. When the erosion occurs, sites are
7 damaged in the extreme, in some instances.

8 So the Chipets Chapter and the Archeological
9 Society would be opposed to any continuing, or improvement
10 or opening of off-road vehicle use, and they would definitely
11 be in favor of closing down a lot of areas that receive that
12 kind of use.

13 Thank you.

14 JOHN SINGLAUB: Thank you.

15 I believe that's everyone who wanted to speak
16 this evening.

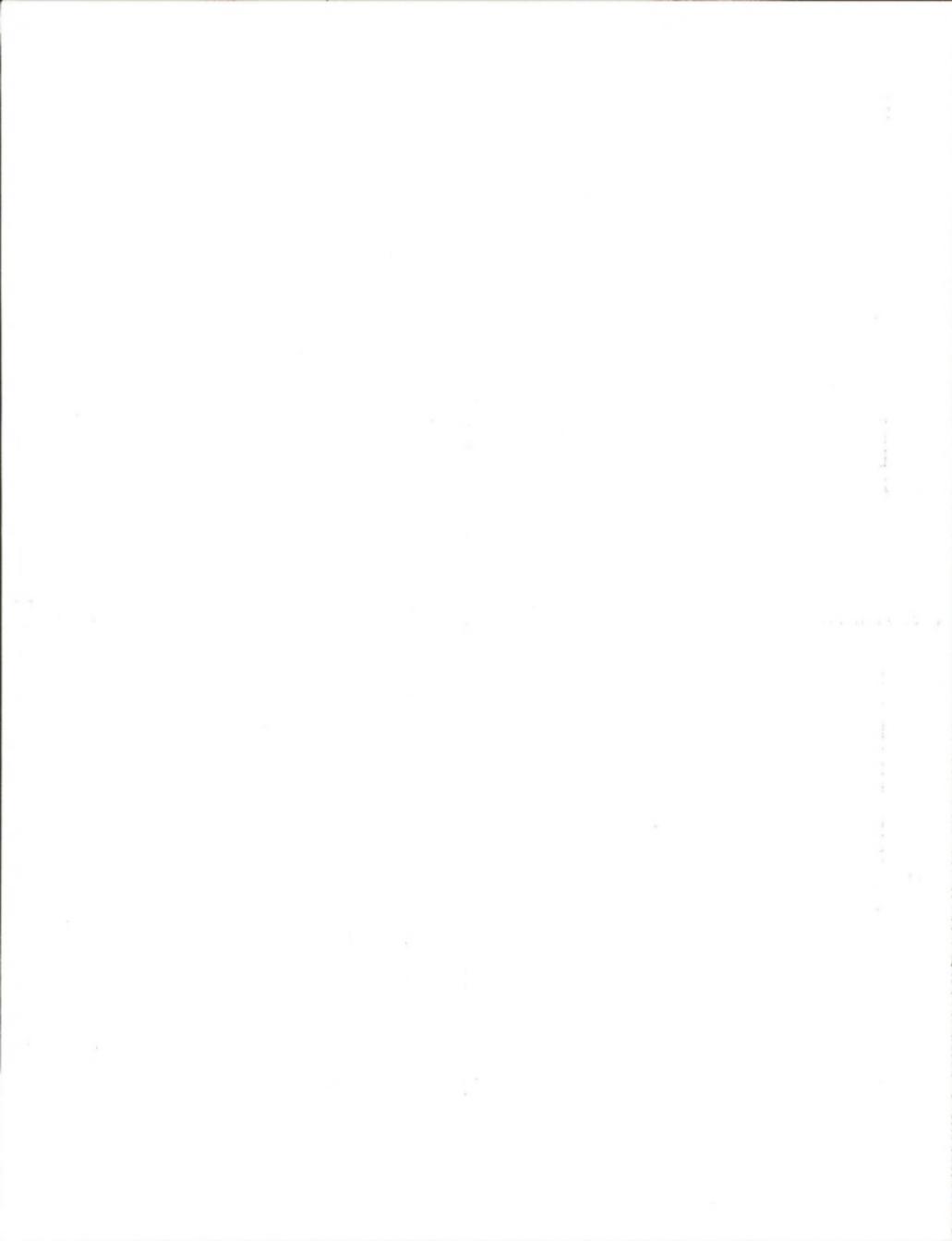
17 I realize the format of the hearing makes it
18 sometimes awkward to get questions answered and to get the
19 point across, and I urge you to take the opportunity at the
20 end of the session now to visit with some of the people
21 up here to get your questions answered, if you have some.

22 I appreciate the time that you have taken to come
23 here this evening, I know I speak for everyone here in
24 thanking you for your interest and concern in the public
25 lands. And thanks for taking time out to come here this

125

1 evening. The hearing is hereby adjourned.

2 (Hearing adjourned.)





United States Department of the Interior

DEPT. OF THE INTERIOR
FEDERAL BUREAU OF RECLAMATION
P.O. BOX 2508
DENVER, COLORADO 80216

Comments on Uncompahgre Basin Resource
Management Plan and EIS

IN REPLY
REFER TO: DC-152

OCT 1 1977

Memorandum

To: Mr. Robert E. Vecchia, RMP Team Leader, Bureau of Land Management,
Uncompahgre Basin Resource Area, 1505 South Townsend Avenue,
Montrose, Colorado 81401

From: Regional Director
Bureau of Reclamation

Subject: Review of Bureau of Land Management Draft Environmental Impact
Statement for Uncompahgre Basin Resource Management Plan and
Wilderness Technical Supplement (DGS 87702)

Our office has reviewed the subject documents and has prepared the attached
comment.

Attachment

Grand Junction Projects Office.

A1. The Reclamation withdrawals between the Black Canyon and Currents area
in Sections 4, 9, 10, 11, 14, and 23, T49N, R7W, are not properly marked on
the map. These lands were withdrawn for the Uncompahgre Project and the
Aspen Storage Unit of the Colorado River Storage Project (CRSP).
The withdrawal in Sections 10, 11, 14, and 23 are for the CRSP and the
withdrawals in Sections 4 and 9 are for the Uncompahgre Project.

A2. The Reclamation withdrawal on Fruittrowers Reservoir should be shown to
include the water surface. This withdrawal is not subject to
relinquishment. Reclamation also has title to the reservoir easement at
Fruittrowers Reservoir.

A3. All 40 acres in the NW1/4 of Section 34, T45N, R7W should also be shown
as withdrawal for the Dallas Creek Project.

A4. On the Paola Project, lands are withdrawn in the SE1/4SW1/4 of Section
18, T138, S9W, but are not shown as withdrawn. In the SE1/4SE1/4 and the
NE1/4SE1/4 of Section 13, T140, S9W, the withdrawal is not plotted
correctly. The tracts identified for disposal in T140, S9W, Section 23;
and T140, S9W, sections 3 and 17, are not subject to relinquishment and
disposal is not compatible with project purposes.

A5. The NW1/4 of Section 3, T140, S9W, is questionable as to being public
land. Reclamation acquired an easement from the private owner
(Overman, R.E.) in about 1950, and if the land is in fact private, the
ROP may need to be changed. If the land is public, Reclamation will be
requesting a linear withdrawal to match the dimensions of our existing
easement. A withdrawal would be consistent with our other land status
agreements with the BLM on the Fire Mountain Circle.

A6. As both the Domingue and Fruitland Mesa Problems are being proposed for
relinquishment in their entirety, we did not provide the plotting or
disposal recommendations for parcels within these projects.

A7. The Withdrawals for the Uncompahgre Project need to be corrected on the
map as follows:

The following parcels should be shown as withdrawal:
The NE1/4SE1/4 of Section 13, in T150, S9W, (it may be shown this way,
but the map scale makes it hard to see), the S 1/2 acre tract of the
SUNSHINE, the SE1/4SE1/4, the NE1/4SE1/4, and the NW1/4SE1/4 of
Section 16, T150, S9W; the 10 acre tract of the SHANAHAN of Section 30,
T151, S9W; the 15 acre of the SHWENKOWSKI and the SHWENKOWSKI of Section
36 of T151, S11W. Also, the lands near to the Juniper the Black Canyon
National Monument need to be added as mentioned in item A1 above.

Certain withdrawals on the South, West, Montrose and Delta canals were
inadvertently relinquished without Reclamation retaining a linear withdrawal
for project facilities. Measures to correct this problem are being worked on
at this time. In the future, any land disposals should retain a linear
withdrawal for all structures, canals, diversion dams, large laterals such as

General

Page 2-10: Recent unpublished studies associated with the Uncompahgre
Recreation Project indicate that the range and population of the
endangered plant Triglochin pallidum may be greater than
indicated in Table 2-11. If these studies are published we will
furnish the information to the Bureau Land Management (BLM).

Page 2-14: In Table 2-11 it is not clear what area "Garrison River No. 3"
refers to. The same comment applies to the terms "Smith Fork
Garrison River No. 1" and "Uncompahgre River No. 4".

Page 2-21: Withdrawals: The management of the power site withdrawals is
currently handled by BLM on Crystal and Domingue. The Crystal
power site withdrawal should be turned over to the Bureau of
Reclamation (Reclamation). The Domingue power site withdrawal
should be kept by BLM for future development as Reclamation is
relinquishing its withdrawals on the Domingue Project at this
time. If there are any questions on withdrawals or right-of-way,
please contact Steve Schwanenfelz or Bill Kilsen in our Grand
Junction Projects Office at FTS 322-4211.

Page 2-2: Off-Road Vehicle Designations: The off-road vehicle designation
for all Reclamation lands (withdrawn or otherwise) is that the
lands are closed to off-road use and off-road vehicles unless
specifically opened. It would enhance management of Reclamation
project withdrawals if they were so designated on BLM maps.
Management Alternatives

Continuation of Current Management Alternatives
(Alternative "A")

Page 3-3: Livestock Grazing: Grazing permits that involve withdrawn lands
should be reviewed and in most cases adjusted to restrict grazing
on developed Reclamation facilities and recreation areas. This
should be handled on a case by case basis.

Map "A":
Considerations below are listed separately by Reclamation project name. Any
proposed disposal of lands that are withdrawn by Reclamation and Reclamation
intends to retain under the Withdrawal Review Program, should not be disposed
of unless the BLM wants to dispose of them to Reclamation. If the disposal is
to Reclamation, absolute fee title would be required to protect project
features from mining activities. Most comments have been accepted by the
proper legal description. In some cases, however, we have not included a
description because of the length. Descriptions for all Reclamation lands are
available from Reclamation withdrawal review reports or from Reclamation's

87 the CO lateral on the Montrose and Delta systems, or other major facilities,
and right-of-way for all laterals.

PRODUCTION ALTERNATIVE
(ALTERNATIVE "B")

All recommendations made under the Withdrawal Review are to remain the same
with the exception of approximately 130 acres at the far west end of the
Paola State Recreation Area which Reclamation is in the process of proposing
for relinquishment.

The Domingue and Fruitland Mesa withdrawal reviews are proposed to be
completed this fiscal year.

Visual resource objectives for all Reclamation recreation areas including the
entire proposed Section 13, T140, S9W, the Crystal, the Domingue, and
Paola State Recreation Areas; and the Fruittrowers area should all be high
scenic quality and high sensitivity. The proposed Current National
Recreation Area, Paola, and Fruittrowers areas should be added to Table 2-18.

The withdrawal section on page 2-11 indicates that Reclamation withdrawals
segregate the lands from the general mining laws. It was the intent and
practice of all Reclamation withdrawals to segregate the lands from all of the
public entry laws. Under the RPA Withdrawal Review Program, Reclamation is
relinquishing all but the bare necessity of its withdrawal lands, and those
lands being retained will be managed with the intent to restrict all surface
occupancies that are contrary to Reclamation project purposes.

The withdrawal table on page 2-22 should be changed to include all Reclamation
purposes such as recreation, flood control, soil and moisture conservation, of
state only Reclamation purposes. As in most cases it may be contended to
mean the listed purposes are the only Reclamation purposes and this is not
true.

Map "B"

Considerations below are listed separately by Reclamation Project name. Any
proposed disposal of lands that are withdrawn by Reclamation and that
Reclamation intends to retain under the Withdrawal Review Program, should not
be disposed of unless the BLM wants to dispose of them to Reclamation. If the
disposal is to Reclamation, absolute fee title would be required to protect
project features from mining activities.

B1. The Reclamation withdrawals between the Black Canyon and Currents areas
in Sections 4, 9, 10, 11, 14, and 23, T49N, R7W, are not properly marked on
the map. These lands were withdrawn for the Uncompahgre Project and the
Aspen Storage Unit of the CRSP. The withdrawal in Sections 10,
11, 14, and 23 are for the CRSP and the withdrawals in Sections 4 and 9
are for the Uncompahgre Project. The portion of Section 8 that is
proposed for disposal is planned for relinquishment and is therefore
approved for disposal.

82. Comments same as A2.

89 83. The 40 acres in the NW1/4 of Section 34, T48N, R9W should also be shown as withdrawn for the Dallas Creek Project.

85 Lands shown for disposal in T47N, R9W in Ouray County north of Cow Creek are important big game winter range and should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to the Colorado Division of Wildlife. These lands are in the vicinity of lands acquired for wildlife habitat replacement under the Dallas Creek Project.

87 84. Comments same as A4. Also, the disposal recommendations for the following parcels are not compatible with project purposes unless a linear corridor is first granted: T14S, R2E, Section 3, NE1/4; T14S, R2W, Section 17, NE1/4; and T14S, R2W, Section 21, about 35 acres.

89 85. Comments same as A5.

85 86. Comments same as A6. In addition, the recommendations for disposal on the following tracts should be changed to retention: The SE1/4 of Section 28, T48N, R9W, the NW1/4 of Section 11, T48N, R10W; the two tracts in Section 11, T48N, R6W; and the apparent disposal (the lands to the east are actually marked) of Section 36, T50N, R11W.

CONSERVATION ALTERNATIVE

MAP "C"

93 Considerations below are listed separately by Reclamation Project name. Any proposed disposal of lands that are withdrawn and that Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities.

89 C1. Comments same as A1.

C2. Comments same as A2.

89 C3. The 40 acres in the NW1/4 of Section 34, T48N, R9W should also be shown as withdrawn for the Dallas Creek Project.

C4. Comments same as A4.

C5. Comments same as A5.

C6. Comments same as A6.

PREFERRED ALTERNATIVE

Map "D"

93 Considerations below are listed separately by Reclamation Project name. Any proposed disposal of lands that are withdrawn and that Reclamation intends to retain under the Withdrawal Review program, should not be disposed of unless the BLM wants to dispose of them to Reclamation. If the disposal is to Reclamation, absolute Fee title would be required to protect project features from mining activities.

D1. Comments same as A1

89 D2. Comments same as A2.

D3. Comments same as A3.

87 D4. Comments same as A4.

89 D5. Comments same as A5.

85 D6. Comments same as A6.

Comments on Unconophyre Basin Wilderness Technical Supplement

Designation of the Gunnison Gorge Wilderness Study Area as Wilderness could affect certain management practices and these effects should be discussed in the final EIS.

49 First, helicopters, small airplanes, and outboard motors are used as inventory tools by the Colorado Division of Wildlife for managing the Gunnison River fishery and uncertain populations. Secondly, rescue operations are occasionally conducted in the canyon by helicopter.

On page 3-13, the minimum flow that Reclamation attempts to maintain is 300 cfs rather than 200 cfs.

71 On page 4-13 it is stated that there is approximately 750,000 acre-feet of water available from Blue Mesa Reservoir. The correct figure is 50,000-60,000 acre-feet annually.



United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA 22092

In Reply Refer To
MGS-Mail Stop 423
DSD 87730

OCT 19 1987

Memorandum

To: Bureau of Land Management, Unconophyre Basin Resource Area, Montrose, Colorado
From: Assistant Director for Engineering Geology
Subject: Review of draft management plan/environmental statement for the Unconophyre Basin planning area, Colorado

We have reviewed the statement as requested in the letter included in the document.

39 The analysis should indicate criteria to be used in permitting mining and disposal of mineral materials on alluvial valley floors and flood plains.
38 Mitigation of related impacts should be addressed. The analyses of cumulative impacts should include long-term effects of aquifer mining and accidental release of saline formation waters into freshwater aquifers. Such contamination may occur long after oil and gas test and production wells are abandoned as well as during operations such as hydraulic fracturing, injection of formation waters, and enhanced recovery. Ground-water impacts to be avoided during secondary and/or enhanced recovery include involving injection and well pressurizing should be included in the analysis.

James F. Devine

for James F. Devine

Copy to: District Chief, WRD, Lakewood, Colorado



United States Department of the Interior

BUREAU OF MINES

P. O. BOX 3008
BUILDING M, DENVER FEDERAL CENTER
DENVER, COLORADO 80202

Intermountain Field Operations Center

October 21, 1987

Memorandum

To: Robert E. Vecchia, RMP Team Leader, Bureau of Land Management, Unconophyre Basin Resource Area, 2505 South Townsend Avenue, Montrose, Colorado 81401
From: Chief, Intermountain Field Operations Center

Subject: Review of the Draft Resource Management Plan/Environmental Impact Statement for the Unconophyre Basin Resource Area, Delta, Gunnison, Mesa, Montrose, and Ouray Counties, Colorado

As requested, Bureau of Mines personnel have reviewed the subject documents regarding proposed management of 483,077 acres of Federal Land and 250,923 acres of subsurface Federal mineral estate, including three wilderness study areas (WSA's) (4,065 acres), in western Colorado. Our comments pertain to the discussion of mineral resources and assessment of impacts under the plan.

Four multiple-use management alternatives are presented in the DEIS. Differences between the four proposals vary considerably in the amount of acreage open to mineral entry and to oil and gas, coal, and geothermal leasing. From a mineral-development standpoint, the Preferred Alternative is the more favorable of the plans described. In comparison to the Preferred Alternative, it makes about 30,000 more acres available to mineral entry and about 190,000 more to oil and gas and geothermal leasing; the acreage open to coal leasing is the same under both alternatives.

35 In the "Affected Environment" section, the discussion of oil, gas, and geothermal resources (p. 2-3 of the main document) assumes that the lack of part or present production of these commodities implies a low probability for future discoveries. We believe that such an assumption may not be valid because seismic work and exploration drilling have been limited in the resource area. We suggest the Affected Environment Section of subsequent versions of the document be modified to better explain the relationship between the assumption of low productivity of future discoveries and the lack of exploration activity in the area.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
1790 W. Alameda Parkway
P. O. Box 25217
Denver, Colorado 80225-0257



RM 1000-700

L7619 (300-77)

OCT 23 1987

Memorandum

To: Robert E. Vecchia, Resource Management Plan Team Leader,
Bureau of Land Management, Montrose, Colorado

From: Associate Regional Director, Planning and Resource Preservation,
Rocky Mountain Region

Subject: Review of Draft Unconophyre Basin Resource Management Plan/
Environmental Impact Statement and Draft Unconophyre Basin
Planning Area Wilderness Supplemental (DES 87/20)

Our comments on the subject draft Resource Management Plan/Environmental
Impact Statement (RMP/EIS) follow. Review of the document was made
relatively easy due to several factors:

1. The draft RMP/EIS is a very well written.
2. The number of alternatives (four) and the orderly presentation of
material made it convenient to compare impacts of alternatives.
3. The three alternatives other than the proposed plan are analyzed as
thoroughly as the Preferred Alternative.

We recognize the Bureau of Land Management's (BLM) multiple-use approach to
land management, but we would like to see more concern for National Park
Service (NPS) interests in specific portions of the Preferred Alternative.

1. The Preferred Alternative appears to reflect a concern for wilderness
values—both on BLM-administered lands and on lands administered by the NPS.
We note that the Gunterson Gorge Wilderness Study Area (WSA) would be
recommended for designation as wilderness; the Adobe Badlands WSA would not
be recommended for designation, but there would be restrictions on
surface-disturbing activities and no Off-Road Vehicle use there. However, we
believe that the Adobe Badlands WSA is deserving of wilderness status and
should not be rejected for designation because of plans to implement salinity
control measures. Efforts to reduce salinity should be concentrated in the
agricultural areas where increased salt loading is caused by agricultural
practices.
2. Some BLM-administered lands near the northeast and northwest boundaries
of Black Canyon of the Gunnison National Monument are designated as potential
exchange tracts under the Preferred Alternative. As the draft RMP/EIS is

71 The geology and mineral resource descriptions in the Wilderness Technical
Supplement tend to discuss only the surface geology of the WSA's. We believe
that formations at depth should be discussed as well. For example, the Adobe
Badlands WSA is underlain by the Morrison and Chinle Formations, both of
which are major hosts for uranium deposits in other areas. Uranium, however,
is not discussed in the Mineral Resources section (p. 3-10). We believe that
the lack of a discussion of the uranium potential in the Morrison and Chinle
Formations is an oversight that should be corrected in future versions of
the document.

The Bureau of Mines currently is conducting a mineral land assessment study
of Gunterson Gorge WSA, but has no current study of either Adobe Badlands WSA
or Camel Back WSA.

Thank you for the opportunity to comment on this document.

Richard A. Stratton
Richard A. Stratton

2



United States Forest
Department of Service

Grand Mesa, Unconophyre and
Gunnison National Forest Delta, Colorado
Phone: (303) 874-7691 81616

Reply to: 1950

Date: 10/23/87

Mr. Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Unconophyre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

We have reviewed the draft Resource Management Plan for the Unconophyre Basin
Resource Area. As you can see from the comments of the District Ranger who
follow, we are unsure of where the fire management strategies are to be applied.
Consequently, we are unable to determine if they would be compatible with fire
management efforts on adjacent National Forest System lands. We recommend that
some additional coordination be done in this respect.

Phonix Ranger District

In reviewing the above referenced plan, we found the proposed management
units compatible with ours, both in terms of location and management
emphasis/direction. The only concern we surfaced dealt with the
application of the three proposed wildfire suppression strategies. From
the information available for review, it was not possible to determine the
geographical locations at which the various strategies would be applied and
whether or not they were compatible with fire management efforts on
adjacent NS lands. I suggest we review the proposed fire management with
the RMP at the Forest level just to be sure we do not have any significant
incompatibilities.

Duway Ranger District

RMP's management areas D1, D2 and D3 are adjacent to our management
prescriptions H8 and H9 on the Unconophyre Plateau. Management emphasis and
direction are compatible.

None of the access acquisition proposals on the Plateau would have an effect
on NF lands. Closing Potter Creek will have no effect. Dry Fork Escalante
Road will not be closed according to Dick Vecchia. RMP's D9 management areas
and emphasis are compatible with our H8 prescriptions although our map
doesn't have them identified.

17 revised, we would like to see these lands either deleted as potential
exchange tracts or have provision for scenic easement language that would
ride with the deed(s) conveying the exchange tracts. These BLM-administered
lands form an important backdrop to the viewshed looking north from the
monument's south rim.

16 3. The four land status maps included with the draft RMP/EIS, after page 43
of the Appendix, need to be revised to show correct RM boundaries. The maps
show the Black Canyon of the Gunnison National Monument boundaries as they
existed years ago; the monument boundaries have since expanded. The maps
fail to show the considerable portion of Grandis National Recreation Area
that occurs in the Unconophyre Basin Planning Area. As a good reference for
correcting the maps, we recommend the 6th Edition (1985) of the Phonix
Quadrangle topographic map.

Thank you for the opportunity to review the generally well-prepared draft
RMP/EIS.

Richard A. Stratton

Richard A. Stratton



ELM's D15 Management area in the Clearmont Ridge country is adjacent to 44, 48, 58 and 59. These appear to be compatible also. The access to High Park would improve access to the NF. Storm King Ski Area would not have an effect on NF as it would be located in the northeastern unit.

The D15 management area adjacent to NF on High Park would be open to DNV's. This is adjacent to a restricted travel area on H.P.

The location of the ELM's proposed three fire management strategies also need to be identified on this end of the Forest.

Other than the fire management item, we have not identified any significant additional concerns. We appreciate the opportunity for this review.

Sincerely,

For: *James J. Hines*
James J. Hines
Forest Supervisor

cc: Regional Forester
Chief (Director, Environmental Coordination)



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTER, REGION
1114 COMMERCE STREET
DALLAS TEXAS 75202

Administrative routing stamp with dates: 18 October 1987, 19 October 1987, and 20 October 1987. Includes fields for FILED, APPROVED, and other administrative markings.

Mr. Robert S. Schmidt
Montrose District Manager
Bureau of Land Management
Montrose District Office
2445 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Schmidt

This is in response to your request for comments on the Draft Planning Area Wilderness Technical Supplement for the Uncompaghe Basin Planning Area located in southwest Colorado.

We continue to support the overall wilderness area concept. While actual conflicts between Air Force flying areas/routings and the proposed wilderness area do not exist at the present time, routes and airspace requirements of the military do change frequently. Mission requirements, fuel costs, and environmental constraints all call on the decision to locate a military training activity. In particular, low altitude high speed flight, because of general aviation and population pressures, has been relegated to those areas least accessible and sparsely inhabited. For this reason, it is requested that you give full consideration to the extent to which a wilderness designation might adversely affect the restrict use of low altitude airspace by the Air Force. If restrictions are placed upon these military overflights, the negative impact on training and readiness will force the Air Force to object to that wilderness designation.

We hope this information is useful in your planning process. We thank you for the documentation previously provided and look forward to continued communication with your office. Our staff project officer is Mr. Raymond Bruntzger, telephone (314) 853-3241.

Sincerely,
John A. Miller
John A. Miller, Lt Colonel, USAF
Director
Environmental Planning Division

Copy to:
HQ USAF/LEEV

15

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PS-8322 (2-77-42)



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement
329 25th Road, Suite E-113
Grand Junction, Colorado 81505



November 5, 1987

MEMORANDUM

To: BNP Team Leader, Bureau of Land Management
Uncompaghe Basin Resources Area, Montrose, Colorado

From: Acting State Supervisor, Fish and Wildlife Enhancement
Fish and Wildlife Service, Grand Junction, Colorado

Subject: Draft Uncompaghe Basin Resources Management
Plan/Environmental Impact Statements and the
Draft Uncompaghe Basin Planning Area Wilderness
Technical Supplement

General Comments

We have reviewed the referenced Resources Management Plan/Environmental Impact Statement and related Wilderness Technical Supplement. The Endangered Species Act (ESA) requires that an action agency consider possible impacts to proposed and listed species and their critical habitats to determine if any proposed plan may affect such species or habitat areas. Should the Bureau of Land Management make a "may affect" determination, then formal consultation should be initiated. Management proposals identified in the plan seem, at this time, to general to make a "may/may not affect" determination for any species with certainty. It is our suggestion that informal consultation continue as specific actions are planned for the resources area rather than trying to make a blanket determination for the broad Resources Management Plan. By consulting on a case-by-case basis, we will know exactly what action is being considered and will have the advantage of the latest biological knowledge for the species involved, as well as important habitats such as wetlands and riparian zones.

Specific Comments

Page 2-10, Table 2-6. Endangered, threatened, candidate, or sensitive plant species.

The habitat descriptions for the spineless hedgehog cactus and Uinta Basin hoodless cactus are reversed. Based on new locations discovered by Jim Ferguson last field season the habitat description for the Delta Ionanthus should be expanded to include mid-altitude meadows able in association with pinyon-juniper. The Hetherill milkvetch (*Astragalus*

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Hetherillii), a plant on State List 3 and which will be added as a federal candidate in the next update, should be added to Table 2-6. Its habitat is clay hills in association with pinyon-juniper and sagebrush. Estimated populations include four collections from the Uncompaghe Resources Area, and the estimated acreage of occurrence is unknown.

Page 2-12, Table 2-8. Endangered, threatened, and candidate animal species.

The river otter, *Lutra canadensis sonora*, is a federal candidate species.

Page 3-30. Disposal of public lands.

We recommend that public wildlife values be considered prior to any disposal of public lands.

Page 3-31, 37. Oil and gas.

The Service would appreciate involvement in any variance to seasonal stipulations on lands used by bald eagles for hunting habitat.

Page 4-50. Impacts on riparian zones.

The Service would appreciate involvement prior to the approval of any disturbances to riparian zones.

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Page 4-51. Impacts on threatened and endangered animals.

The Service would appreciate involvement prior to any mineral resources management that might affect wintering bald eagles. Appropriate consultation may be necessary if offroad recreational vehicles use affect the Uinta Basin hoodless cactus or if the disposal of public lands affects any threatened or endangered species.

Page 5-7. Impacts on terrestrial wildlife.

The Service would appreciate notification of the potential loss of any raptor nesting habitat.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII

898 18th STREET - SUITE 800
DENVER, COLORADO 80202-8405

NOV 05 1987

Re: RHM-EP

Robert E. Vecchia, RHM Team Leader
Bureau of Land Management
Thompson's Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Re: Draft Thompson's Basin Resource
Management Plan and Environmental
Impact Statement (RHM/EPIS), and
Wilderness Technical Supplement

Thank you for the opportunity to provide our comments prior to completion of the draft. Again, we would appreciate the opportunity to comment when specific actions are completed.

Robert P. Kuygen

cc: AWE-Denver
PWE-SLC
Reading File
Official File

Docber/dm11-5-97 (blsuncon Fuser 5)

Dear Mr. Vecchia:

In accordance with the National Environmental Policy Act (NEPA) and our responsibilities under Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the referenced documents. The EPA appreciated the opportunity to meet with you and other RHM staff at Montrose in March, 1985. The meeting was followed up by EPA's scoping concerns for the project which were sent on May 3, 1985. In addition to environmental conditions and effects, our review is also focused on the RMP as a "framework for managing and allocating public land resources" and its importance in establishing "management direction" (page 1-1), our enclosed detailed comments are intended to make a constructive contribution to the management direction.

Based on our concerns and the criteria EPA has established to rate adequacy of draft EISs, we have rated this draft EIS as category III-2 (environmental concerns - insufficient information). A summary of our EIS rating definitions is enclosed. We covered the inclusion of management units; initiatives on aquatic and riparian monitoring; and the emphasis on salinity, riparian, and aquatic systems. However, our enclosed comments address insufficiencies and recommendations that we feel are appropriate at the RMP level of planning, regarding:

- o the description of consistency with water quality standards (existing/designated beneficial use, use protection criteria and anti-degradation requirements) and the Federal/State water quality management programs,
- o the framework of measures, criteria, and indices that would be used, e.g., physical measures (such as channel) and streambank stability), chemical criteria, and biological inflows, for implementing water quality standards (WQS)/aquatic resource protection under the Clean Water Act (CWA) and Federal Land Policy and Management Act.

- o consistency of analysis of effects on aquatic resources/beneficial uses in relation to applicable statutes,
- o a framework for CWA/WQS monitoring,
- o additional guidance and documentation for protection of riparian and wetland values,
- o planning of range management to support multiple ripeland values under applicable statutes,
- o need for consistent Areas of Critical Environmental Concern (ACEC) recommendations by alternative, and plans for ACECs that are adequate to assure resource protection,
- o compliance with the Endangered Species Act,
- o and inclusion of more specific plans for coordination and implementation, among other items, in an implementation chapter or appendix.

Several features of the conservation alternative are identified, that would also help provide a stronger, more aggressive resource management program.

A statewide anti-degradation policy is an important part of State WQS. EPA's WQS regulation requires that, at a minimum, state policy ensure that existing instream uses and the level of water quality necessary to protect the existing uses be maintained and protected (40 CFR part 131.13). This provision applies to all waters of the state. Furthermore, the state policy must establish additional measures for protection of certain high quality waters (waters where ambient quality exceeds that needed to protect the "fishable/swimmable" uses) and waters which may constitute outstanding national or state resource waters. At present, there is a difference in the way the federal and state regulations and guidance identify high quality waters. Under the current state regulation (SCCR 3.1.8 (3)), High Quality Class II waters "... shall be maintained and protected at their existing quality unless the Commission chooses, after full intergovernmental coordination and public participation, to allow lower water quality as a result of necessary and justifiable economic or social development". In Colorado, this level of protection is applied only to water designated by Colorado's Water Quality Control Commission (WQCC) as High Quality Class II waters. EPA's regulation would not distinguish between those waters designated high quality Class II by the state and those that are, by definition, high quality. EPA has approved the current state anti-degradation standard in the past. However, based on changes enounced in EPA's new water quality standards regulation, the WQCC has begun a review of the present standards and expects to complete the review process in mid 1988. We encourage the RHM to be part of this process and be aware of the applicability of any new requirements that may apply to RHM streams. The State of Colorado contact person is Dennis Anderson in Denver (303-4571) and the EPA contact is William Kuehnle (PWS 561-1506 or commercial 292-1086).

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We would appreciate the opportunity to discuss with the RHM its proposed responses and RMP/EIS revisions relating to EPA concerns prior to the RMP/Final EIS. Based on experience reviewing these documents, such a coordination process would be beneficial in helping address our concerns. Please contact Douglas Lofstedt of my staff as needed for further EPA coordination at 303-293-1717 or PWS 564-1717.

Sincerely,
Robert E. DeSpain
Robert E. DeSpain, Chief
Environmental Policy Branch
Policy and Management Division

Enclosures

- cc: Neil F. Wozck, Colorado RHM State Director
- David Williams, Office of Planning and Environmental Coordination, RHM Washington Office
- Jim Scherzshligt, Colorado Department of Health
- Rick Bruner, DENR, Grand Junction
- Laurie Matthews, Colorado Department of Natural Resources
- William Kuehnle, EPA Office of Federal Activities

SPA DETAILED COMMENTS ON THE BEA DRAFT ENVIRONMENTAL IMPACT STATEMENT AND SUPPLEMENTAL ENVIRONMENTAL INFORMATION AND WILDLIFE TECHNICAL SUPPLEMENT

Aquatic Resources, Watershed Management

Our review of plans for water quality and aquatic resource integrity is based on consistency with:

- o Colorado's water quality standards (QWS) and water quality management program.
- o Executive Orders (EOs) 11752 and 12088 and Clean Water Act Section 113 requirements for Federal agency leadership to "protect and enhance the quality of . . . water . . . resources" (EO 11752) through meeting applicable standards.
- o requirements for RMP consistency with "officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State and local governments" in 43 CFR part 1610.3-2.
- o Federal Land Policy and Management Act (FLPMA) policies to "protect the quality of ecological, environmental, . . . and . . . water resource . . . values" (Section 1021a (8)). To meet applicable State and Federal pollution control laws and water pollution standards or implementation plans" (section 202(c)(8)), and "to prevent unnecessary or undue degradation of the lands" (section 10202(b)).
- o the Clean Water Act (CWA) objective to "achieve and maintain physical, chemical, and biological integrity of the nation's waters" (Section 101(a)).
- o and "WATERSHED SOURCE CONTROL AND WATER QUALITY STANDARDS" guidance (August 19, 1987) from Chapter 2 of EPA's Water Quality Standards Handbook.

The draft RMP/EIS proposes impacts to aquatic resources from several activities:

- 1) Locatable mineral activities could "result in water quality degradation," "increase sediment and salinity loads in local surface waters," and "would result in heavy metal contamination from mine water discharge and spoil-pile runoff" (page 4-49).
- 2) Oil and gas activities "would increase sediment and salinity yields in local surface waters" (page 4-49).
- 3) "Road construction and extraction of mineral materials would increase sediment and salt loads in local surface waters," and could alter "natural stream channels" and "surface water flows" (page 4-49).

- 4) Forest management activities "would cause increased sedimentation, bank degradation, and water temperatures, and decreased streambank cover" (page 4-54).
- 5) ORV management would leave aquatic habitat areas "subject to degradation" (page 4-54).

The Preferred Alternative would also require "Measures designed to minimize erosion and water quality deterioration" and "minimize site-specific riparian and aquatic degradation that is in place for surface disturbing activities" (page 3-29).

In response to these potential effects and/or violations of QWS, we found that the RMP/EIS provides an insufficient framework of planning, management, and monitoring requirements to implement CWA and FLPMA requirements. What measures, criteria, and indices will be used, e.g. physical criteria such as channel and streambank stability, chemical criteria, and biological? What does "minimize" mean? The criteria for mining activities, including stinging ditches, 73 near the RMP/EIS, need more specificity. User needs to be clearly defined in the text. Consistency with the State water quality/management source (QWS) control program should be addressed (see discussion on page 2-4 only) address BEA coordination in locating and identifying QWS pollutants). Similar concerns are raised by plans to prohibit utility projects "which would have long-term adverse effects on riparian/aquatic systems" (page 3-38), and to have "short-term sediment yield increases" from vegetation treatments (page 4-49). What are allowable short-term impacts? How long? The methods to be used in the activity plan NEPA documents to predict effects on QWS/beneficial uses should also be described in the RMP/EIS.

There are several other questions of RMP/EIS consistency with the above (even though compliance with Federal and state water quality standards was a planning criterion (page 3-5)).

We would like to see the affected environment chapter establish more clearly the existing QWS, including designated beneficial uses and anti-degradation requirements, and status and trends (to the extent of available information) similar to the discussion of air quality standards. Also, we suggest that Chapters Two, Three, and Four address water quality, QWS, and aquatic system/habitat in an integrated manner. Aquatic resource activities. The aquatic resource requirements of the CWA and FLPMA should be described as part of the planning framework and objectives.

We commend the BEA for including aquatic habitat conditions (page 2-14) and plans for intensively reviewing "to miles of stream" to "locate and protect aquatic habitats" (page 5-6). Does the amount of planned improvement conflict with the amounts stated in Chapter Four? For example, 40 miles improvement is planned under the riparian program and 60 miles is planned under the grazing management program (page 4-43).

What are at least the general aquatic life/habitat standards and/or objectives to be achieved (page 3-44)? The management concern is to "identify high potential fisheries riparian improvement and management" (page 2-7). Consistency with the CWA should be provided since the CWA does not distinguish between degree of aquatic life potential (Section 101(a)). Fisheries improvement plans should: correlate to impairments of QWS; include consultation with the Colorado Department of Health (CDOH) (since it administers QWS); and be consistent with CCRS priorities. If "existing condition" is maintained "on the balance of the aquatic habitat" (page 4-53), will any existing QWS violations be perpetuated? We like the strong approach to managing the riparian aquatic resources presented in Management Units C-4 and C-28 (pages 3-20, 26, and 27).

The intent to improve "aquatic habitat, . . . streambank stability, and water quality . . ." for fish in the Great Sand Dunes appears commendable (Wilderness Technical Supplement page 8-1), what are the measures for "good" condition under the CWA/QWS? It is not clear how results under non-wilderness management would be better or equal to that under wilderness management.

Sources of drinking water from BEA lands are mentioned on page 2-6. What are the existing drinking water problems (if any), potential impacting activities, and water quality improvement measures?

Numerous references to impacts to "local surface waters" are made. What is "local"? Protection under the CWA and FLPMA should be included. We suggest that oil and gas management requirements be referenced for Management Unit D-9 (page 3-30).

Control of soil erosion remains another concern. Of the 94,110 acres with erosion data, over 85,000 acres have either moderately or severely "accelerated erosion" (page 2-4). Several areas have severe gully erosion (page 2-5). However, BEA proposes to have erosion control projects "incompatible" with livestock grazing and woodland production activities (page 3-43). This appears to be, for example, by plans to manage grazing to "increase sediment and salinity yields far above normal" for some areas (page 4-50). A reference to CWA compliance is not made. We believe that providing erosion and sediment control is a basic land stewardship responsibility even if it conflicts with grazing, timbering, and other uses. We ask that the RMP/Final EIS contain a more clearly defined action plan to address areas of accelerated erosion and to prevent new erosion problems. This action plan should also specify more detailed direction for erosion control priority in new and existing allotment management plans (MMPs). Also, it is not clear why erosion control projects would not be compatible with wildlife winter range and riparian management (page 3-33). We found that the disturbance of riparian habitat for soil resources management to be insufficient on page 4-53 (only in-channel structures are briefly discussed).

It is unclear why livestock grazing use would be restricted on only 39,410 acres (page 2-45). Apparently, the RMP/EIS does not address the adequacy since erosion rates would be reduced "if" RMP objectives are met (pages 4-48 and 49). The RMP/EIS should include guidance for correcting readily reversible problems that do not require riparian area restoration. The Conservation Alternative needs to be more sensitive and aggressive for range stewardship.

We ask that the coal unsuitability report be included in the RMP/EIS.

The draft RMP/EIS discussed the significant aquifers and provides a qualitative review of the water quality of each area (page 2-7). Since the alternatives analysis addresses only surface water, it appears that trends and projected effects are not considered to be of major importance under the RMP. We encourage much more site-specific detail for the appropriate projects.

Riparian Areas and Wetlands

The draft RMP/EIS appears to provide a strong, general basis for the riparian area/wetland management program by:

- 1) continuing to inventory and monitor riparian areas,
- 2) improving the vegetation conditions on 6,320 acres of land "by implementing specific protective and restorative measures" (page 3-43), and
- 3) by maintaining or improving "riparian zones in the remainder of the planning areas" (page 3-43).

We have several concerns that we would like to have addressed in order to achieve more detailed management guidance in the RMP. We suggest a thorough description of how vegetation condition meets: 1) the BEA Riparian Area Management Policy "to achieve a healthy and productive ecological system for maximum long-term benefits to riparian values across the State Policy's background statements; and 3) the Executive Order 11980 and 11990 (Floodplain Management and Protection of Wetlands, respectively) requirements to preserve, protect, and restore the natural functions of such areas. What are the specific standards/guidelines for "improvement and protection of conditions" how are the objectives consistent with CWA/QWS objectives? Are there to be any other riparian areas? Also, we ask that the Water Quality Control Division of the CDOH be informed of the priority areas of treatment so they can be incorporated into the CWA Section 319 QWS assessment report.

The Preferred Alternative either would or could allow various activities in areas riparian/wetland systems:

- o "Approximately 4,000 acres of riparian zones would be opened to mineral exploration" with lifting of existing mineral withdrawals (page 4-20). Associated surface disturbance "would lead to increased sedimentation and streambank instability on 25 acres miles of aquatic habitat" (page 4-31).
- o Some riparian areas would apparently be left "open to ORV use" and "would be subject to degradation" (page 4-54).
- o Coal development would be considered (page 3-38).
- o Forest management activities would take place with up to 60 to 700 acres of riparian vegetation being degraded (page 4-51).

Consistency of the above management direction with existing policies and executive orders should be documented. It is noted that the staff appears to lack sufficient criteria and standards for NPS/aquatic resource protection (under the OIA and PLPMA) to be applied to management of the above activities. Without such criteria and standards, for example, we support the Conservation Alternative which would withdraw riparian zones from mineral entry (page 4-22). Formulation of mitigation measures for impacts of coal development is mentioned on page 3-38. The final RPP/ES and associated RPP's mitigation policies, e.g., avoidance, restoration, compensation, etc., for riparian/wetland/aquatic resource impacts appear to be leaving areas open to OIV use contradicts the Preferred Alternative direction on page 3-43 under which most riparian areas would be improved with at least maintenance of existing conditions for the forest.

The action alternatives rely heavily on intensive grazing management to improve riparian areas. We request more documentation of actual planned grazing management tools. This documentation should include more information or experience in using grazing management with riparian areas to achieve adequate improvement and protection of multiple riparian values.

24 Table 2-5 lists 1,034 acres of riparian vegetation type. Much larger amounts of riparian zones are mentioned elsewhere. What is the correct amount of riparian areas?

Monitoring and evaluation

The draft RPP makes several references to monitoring. RPP implementation will be monitored (page 3-1). "Water quality . . . would be inventoried and monitored" (page 3-29). The riparian zones would have intensive "aquatic habitat" monitoring (page 3-38). While we commend these planned initiatives, we request that the document go further in describing the comprehensive OIA monitoring program in an appendix or monitoring chapter. The monitoring program (not plans for each activity) should include such information as: (1) goals and objectives, (2) types of surveys (visual, sediment, or assessments) to be used, (3) parameters to be monitored, (4) management and environmental indicators (e.g., aquatic habitat, sediment delivery), (5) monitoring methodologies, (6) personnel for monitoring implementation and adequacy of best management practices, (7) the person/position responsible for monitoring, and (8) the feedback loop which achieves timely notification to activities. Refer to our sampling letter for other comments. It would provide the basic framework for OIA monitoring (including NPS/beneficial uses) in the Resource Area. However, there is no assurance that this monitoring framework has been established. Groundwater monitoring should also be included as needed. The other agencies and public should be able to review and comment on this framework in the RPP/ES. The RPP director would then be applied in site-specific detail. The RPP monitoring program would help meet 4) CFS Part 1604-4-3 requirements that the "proposed plan" establish "intervals and standards" that "shall provide for evaluation to determine whether mitigation measures are satisfactory". We could not find the "intervals and standards". What is the early warning system to detect existing violations or risk of potential violations of the OIA? Are there going to be reference streams? How are the water quality inventories and monitoring to be done (page 3-37)? How are they designed to document protection of NPS/beneficial uses, status, and trends?

76 The New Clean Water Act amendments were passed in February 1987. A primary concern is the new NPS control program (Section 319). RSM cannot match other Federal EPA dollars, but all states, private land owners, and private organizations can and do plan to participate in the program. Some of this work may be done on BLM lands. How will BLM participate in work on riparian/wetland watersheds to improve water quality? We need to provide an assessment of condition of their water bodies to the State as part of the assessment plans of the Section 319 management program. Additionally, the State will be identifying in its Section 319 management program the Federal State programs/projects that it plans to review under Executive Order 12377 for consistency with the State's NPS management program. BLM involvement in this process would be described. The State of Colorado contact person for the NPS program is Greg Parsons in Denver (303-479-4641).

75 We suggest that the implementation chapter or appendix list the specific inventories, assessments, and management RPP/ES. We believe that there should be a priority order along with anticipated costs and schedule for completion. Of particular concern to EPA to have included are: NPS/aquatic life assessments; watershed and related management plans; quality control plans; cooperative management plans; wetland and riparian area inventory and management plans; and groundwater studies. We feel that the RPP/ES should address the commitments of the Resource Area office to actually request the funds needed to implement these projects, what is the linkage of the budgeting process to implementation of RPP-identified projects?

25 Extensive site-specific project planning and impact analysis/disclosure under NPS will be done under this RPP/ES. We believe that there should be a continuing need for public and other agency involvement in planning some of these projects (rather than just having the analyses available in the RPP/ES). The strategy for this involvement remains unclear and should also be addressed in more detail in an implementation chapter or appendix.

76 Even though compliance with NPS is a planning criterion (page 3-5), it is not clear what is included in implementation monitoring regarding OIA/NPS compliance, and aquatic resources.

Area of Critical Environmental Concern (ACEC)

101 The RPP/ES alternatives contain different ACEC recommendations (Table 3-8). It is our position that the ACEC should be the same areas and size for all action alternatives. Either they are or are not valid ACEC areas regardless of what the RPP/ES alternative is. Management practices may vary by alternative, however, the same ACEC protection objectives. Consequently, consistency with PLPMA requirements to give priority to the designation and protection of ACEC (Section 202(c)(3)) is not clear. If areas were watershed, soils, NPS, wetlands, riparian areas, or municipal water supply concerns were considered, wetland management requirements will assist for ACEC designation. We would like to see an appendix that describes all potential ACECs recommended by BLM staff or others, reasoning for not recommending any particular area (if any), and the RPP/ES, and any special management the ACEC(s) may need. Also, we believe that management plans (including inter-agency and public review) are needed for all ACECs, however, it is not clear that such plans are to be done.

Threatened and Endangered Species

27 The preferred alternative would have a commendable intent to "Require measures to protect . . . E species, individuals, and habitats in plans for all surface disturbing activities" (page 3-43). However, this intent appears to be contradicted in Chapter four where statements are made that the preferred alternative would "reasonably accelerate destruction of the Dinta Basin and backless canyons (a threatened species) in the North Delta OIV area, and result in a loss of 10,000 acres of potential habitat for the Dinta Basin backless canyons and Delta Intermittent and Intermittent Wetlands" (pages 4-31 and 32). We would like to see additional direction/documentation in the RPP action alternatives to comply with Endangered Species Act requirements for doing everything possible to conserve such species (Sections 2(c)(1) and 3(b)). We would like to see the impact analysis address in more depth both indirect and cumulative impacts under 40 CFS Part 1604-4 and B with a distinction between the OIA. For example, the section on riparian/wetland benefits briefly addresses impacts to potential habitat, rather than existing species and their habitat. Also, what is the basis for determining priority of OIV use over protecting a E and/or candidate or sensitive species?

Other Concerns

75 The RSM states that there is some coordination with the State in locating NPS water quality "water pollutant sources", and that input to the State's beneficial water quality assessment under OIA Section 319 is made. We would like to see an RPP/ES implementation chapter or appendix recognize action to be taken to address any remaining water quality impacts identified in the 305-B assessment, and the inter-agency coordination and consultation strategy for NPS-related programs. The RPP should identify procedures that will be used to ensure consistency with water quality management plans for the area.

STATE OF COLORADO ROY ROMERO, Governor
DEPARTMENT OF NATURAL RESOURCES
1313 Sherman St., Room 714 Denver, Colorado 80202 269-3311

9
Geographic Survey
State of Land Conservation
Division of Natural Resources
Division of Wetlands
Division of Game Conservation
Division of Parks & Recreation
Division of Fish & Wildlife
Division of Water Resources

November 5, 1987

Robert E. Vecchia
Bureau of Land Management
2525 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

State agencies have completed the review of the Draft Uncompagne Basin Resource Management Plan and Environmental Impact Statement. We offer the following comments on the management alternatives and their effects on the important resources of the area.

Wildlife

From the perspective of wildlife and wildlife recreation, the Division of Wildlife prefers the Conservation Alternative. This alternative would best conserve and protect wilderness, wildlife habitats, watersheds and recreational areas. This high level of natural resource conservation is justified in light of the significant economic values of wildlife and recreation in western Colorado.

The Division, in cooperation with the Bureau of Land Management (BLM), has a biphenyl sheep reintroduction program currently underway in the Gunnison Gorge. The agencies should make arrangements to continue and enhance this program.

83 The Gunnison Gorge area is a Gold Medal fishery which should be maintained and enhanced. Protection of the surrounding watershed and associated resources are necessary to protect the fishery. The Conservation Alternative emphasizes this protection. However, other management options are available and should be considered if this alternative is not selected.

85 Protection of the most critical wildlife habitats in the Uncompagne Resource Area, riparian areas and big game winter range, is essential. The proximity of BLM public lands to private lands at the lower elevations necessitates additional management to enhance these critical wildlife ranges. The Conservation Alternative will not consider disposal of public lands. Rather, private land exchanges would be emphasized to obtain crucial big game winter range, riparian areas, and wetland areas. Public access to public lands would be acquired.

Attorney at Law
P.O. Box 790
Montrose, CO 81402
(303) 249 4534

Mr. Robert Vecchia
Page 2
November 4, 1987

November 4, 1987

Mr. Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 S. Townsend Avenue
Montrose, CO 81402

RE: Draft Uncompahgre Basin RMP/EIS and WTS

Gentlemen:

The City of Delta hereby submits the following comments concerning the draft RMP/EIS and WTS for the Uncompahgre Basin Planning Area.

- 1. Generally the documents fail to adequately identify and discuss the development of hydro power resources on the Gunnison River and in the Gunnison Gorge as a specific resource or planning issue.
- 2. The description in the discussion of the Gunnison Gorge WSA on page 2-20 is devoid of any analysis of potential power projects.
- 3. The Wilderness Technical Supplement is totally inadequate and inaccurate concerning its analysis of hydro electric projects within the Gunnison Gorge by making the following unsubstantiated and erroneous assumptions.
 - A. Economic feasibility of these hydro projects is low.
 - B. The projects will not be developed.
 - C. The impact due to precluding development is negligible.
 - D. If the projects are developed, positive impacts will be negligible.
- 4. The failure to analyze the social and economic impacts of wilderness designation is erroneous. Preclusion of hydro power and water projects will have a dramatic adverse economic effect.

DEL 2/15

- 5. The discussion of City of Delta water rights decrees on the Gunnison in the Gorge on pages 3-15 and 3-16 of the WTS is incomplete because it does not recognize that the City's decree is also for consumptive uses for municipal and industrial purposes.
- 6. The discussion on page 3-16 of the WTS concerning the alternative proposals for development is misleading. Such proposals are being considered in consideration with the legislation to create a Black Canyon National Park and Wild and Scenic River. Under the Wild and Scenic Rivers Act, the City of Delta is entitled to just compensation for what amounts to a taking of its water rights. The City has been willing to discuss alternatives to development of its project in the context of the Black Canyon National Park proposal because it recognizes that other benefits will accrue to the City from that proposal. The amount of water proposed to be treated to the City as compensation clearly demonstrates (understated as it is) the considerable value of the City's water rights.
- 7. The conclusion on page 4-12 of the WTS that the impact of not being able to develop hydro electric power projects is negligible is totally erroneous for the following reasons:
 - A. Notwithstanding the exception for presidential action, wilderness designation will preclude any possibility of developing the projects.
 - B. Wilderness designation will make it virtually impossible for the City of Delta to perform the necessary due diligence work in order to keep its conditional rights in the Gorge. This will result in substantial detrimental economic effects.
 - C. The City of Delta will lose the many thousands of dollars it has invested already in these water rights and will lose the potential benefits from the eventual development of its project.
 - D. The conditional water rights in and of themselves are very valuable. Loss of these rights will allow projects such as the City of Aurora's Transmountain Diversion Project to obtain decrees for unappropriated water which otherwise may not be available. This will result in all of the very substantial impacts related to such a transmountain diversion project.

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DEL 2/15

Mr. Robert Vecchia
Page 3
November 4, 1987

Robert E. Vecchia, RMP Team Leader
BLM, Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81402

Dear Mr. Vecchia,

The Montrose District Advisory Council submits the following two resolutions (as adopted October 29, 1987) for your consideration in the RMP process.

RESOLUTION 1: The MNR should recommend that the Gunnison Gorge be made a Wilderness Area to be administered by the BLM.

RESOLUTION 2: The MNR should adopt the preferred alternative after reviewing and resolving the following issues:

- 13 [A. The plan should identify specific management measures for riparian stream and show better defined riparian zones.
- 68 [B. Canalbank and Aclous wetlands WSA should be reconsidered for wilderness recommendations.
- 136 [C. More attention should be focused on managing future increases in off-road vehicle use.
- 67 [D. The RMP should identify trade-offs and slow economic data dealing with land and water management proposals.
- 3 [E. Study areas (natural, undisturbed ecosystems) should be established.
- 102 [F. The location of the proposed right-of-way corridor should be given a clearer look.
- 30 [

Sincerely,

Greg V. Bader
Greg V. Bader, Chairman
Montrose District Advisory Council

Very truly yours,

CITY OF DELTA

John R. Kappa

John R. Kappa

Delta City Attorney

JRK/vl

DEL 2/15

Simon & Schuster
2405 S Townsend
Montrose, CO 81402
District manager
Dear Sir.

| | | |
|-------------|-------------|-------|
| RECEIVED | OCT 30 1987 | RM |
| CONTRIBUTOR | | COLO. |
| DATE | | |
| TIME | | |
| BY | | |
| FOR | | |

The Montrose Grazing Board unanimously voted to authorize Jim Swick - Chairman of the board - to draft a letter opposing the reduction to 35% use on the Uncompahgre E.T.S. and to recommend moderation as critical riparian areas. The permittee not affected by Riparian Areas to maintain full grazing preferences as AVM's

Board member Jack Musser inspected some of the areas and felt we were justified to make this recommendation.

Sincerely,

Gene Vecchia
RMP Team Leader



601 Canyon
Boulder, Colorado 80302
303-449-5595

SIERRA CLUB SOUTHWEST OFFICE

September 17, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I have read your wilderness recommendations for three desert roadless areas which is contained in your draft Uncompahgre Basin Resource Management Plan.

I would like to thank you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for Wilderness protection. This will help increase the chances of the Gunnison River to be considered as a Wild River under the Wild and Scenic Rivers Act. Because this area will be protected as a wilderness, thousands of visitors will still be able to enjoy the beauty and the recreational benefits of this area in the future.

I do feel that the BLM needs to reconsider recommendations for Camel Back and Adobe Badlands as a wilderness. I do not understand the BLM's approach to their idea of management of a shrinking resource such as wilderness. Camel Back and Adobe Badlands are just a few of the potential wilderness left on the plateau. According to BLM's reports, there are absolutely no resource conflicts with wilderness designation in these areas. In Camel Back, BLM has mentioned that there are no timber or mineral conflicts. There are four dry oil and gas wells which have been drilled nearby Adobe Badlands, which indicates a low potential for minerals. Both areas contain many species of plants and animals which are considered endangered under old management. There is no telling how many more species will become endangered in the near future if nothing is done to protect them.

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136

I feel that the BLM needs to reconsider their recommendations that the Camel Back and Adobe Badlands as a non-wilderness area.

Thank You,
John Hurdley
Internship
Southwest office

540 N 5th St
Montrose, CO 81401
Sept. 25, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S Townsend Ave.
Montrose, CO 81401

Dear Gene:

As I will be unable to attend the September 29th hearing regarding wilderness recommendations in the draft Uncompahgre Basin Resource Management Plan, I would like to take this opportunity to comment on the plan. First, I would like to thank the BLM for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Secondly, I would like to request that Camel Back (Roubidoux Canyon) also be designated as wilderness. This status would benefit several endangered plant species as well as big game herds. The fact that this area has resource conflicts further argu-

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to its being designated as wilderness.
Third, I would like to ask that the BLM recommend the Adobe Badlands for wilderness status as well. This area contains Unita Basin hoodless cactus, an endangered species, and has a low potential for minerals. There is no timber and, since the BLM intends to close the area to ORUs, there is no reason why this area should not be designated as wilderness.

Fourth, I oppose the BLM's stance on the Storm King ski area site. The impact on elk calving habitat as well as mule deer fawning is too great and the 5-year grace period for developers is preposterous.
I hope you will take my input into consideration.

Sincerely,
Babs Schmalz
Colorado Mountain Club
Conservation Chair
for the Western Slope

October 20, 1987



Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I represent the Chipeta Chapter of the Colorado Archaeological Society, and presented verbal comments on the BLM's Draft RMP for the Uncompaghe Basin at the September 29, 1987 hearing in Montrose. I won't repeat verbatim what I said that evening since it is part of the official record, but would like to make additional comments on several key points.

The members of the archaeological community in the Montrose area are extremely concerned about the current rate of destruction of archaeological resources. The law enforcement approach to cultural resource management has limited value. Innovative approaches must be developed and public education concerning cultural resource appreciation and preservation should receive high priority. The Draft RMP, Preferred Alternate takes the right, first step, but much more can be done. Some recommendations are listed below.

- 1) Conduct an intensive archaeological resource survey on BLM lands between Highway 90 and Roubidoux Creek.
- 2) Publish a booklet that interprets the prehistory of the Uncompaghe Basin based on archaeological studies done in the area. The booklet should be easy-to-read, well-illustrated, include reusing for

resource preservation and be sold for a nominal fee to cover the cost of printing.

- 3) An interpretive prehistory display should be assembled with representative types of artifacts from the basin and include photographs, charts and resource preservation information. The display could be housed at the Ute Museum, Montrose County Historical Museum or other high-profile facility.
- 4) Develop presentation that could be shown to tourists, local civic groups and schools on archaeological topics.
- 5) Actively pursue mitigation of damaged archaeological sites.
- 6) Involve local groups interested in prehistoric and historic resources with the implementation of the above recommendations.
- 7) Patrol areas that contain high site densities and monitor site change and conditions.
- 8) Restrict OHV use in high site density areas to existing jeep roads and close jeep roads that aren't necessary.

In conclusion, I would like to emphasize that the BLM has a timely opportunity to address the cultural resource management problem. Your decisions concerning the RMP will set the tone for future generations and hopefully preserve the unique cultural resources of the Uncompaghe Basin.

Sincerely,
Bill Harris
Bill Harris



2225 E. Colfax Ave. Denver, CO 80206-1290 393-0466

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompaghe Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

October 23, 1987

Dear Mr. Vecchia,

I would like to make comments on behalf of the Colorado Environmental Coalition in regard to the Uncompaghe Basin Resource Management Plan. The Colorado Environmental Coalition was formed in 1965 to work for protection of Colorado's environment. The organization has 40 member groups with a combined membership of over 35,000 people.

Overall, we found the plan to be very vague. It did not really quantify the impacts. The plan uses subjective terms, such as "substantial," "potentially improve," etc. instead of quantified data. We view these subjective comments on impacts as being poorly conceived and we want actual numbers to allow the public to better understand the impacts.

Coal

One of the most disturbing aspects of the preferred alternative's coal leasing proposal in the area open to coal leasing. 83,396 acres are open to further leasing consideration. Under the current management alternative, which we would more readily support, the acreage open to coal leasing would be 20,717 acres. This is a much more realistic figure considering current and foreseeable market trends. This would also allow for better protection of the environmental quality of the North Fork Valley because the BLM could select the areas, which would be the least harmed by coal production, for further consideration.

The Plan found only 569 acres of land out of the 83,396 acres in the coal planning units to be unsuitable for further leasing consideration using the unsuitability criteria. This is obviously a very narrow interpretation of the unsuitability criteria. Substantial acreage in the environmental quality of the North Fork Valley because the BLM could select the areas, which would be the least harmed by coal production, for further consideration.

33 under the unsuitability criteria, and explain the methodology used for determining unsuitability. This is one of the few RMPs where the reader is not provided with this basic information. A good example of where an area should have been found unsuitable under the Scenic Areas criterion is the higher elevations of the Adobe Badlands WGA. This badlands area is obviously one of the most scenic areas in the Uncompaghe Basin Resource Area. A reevaluation of the unsuitability criteria obviously needs to occur in the Final EIS.

42 The plan inadequately addresses multiple-use trade-offs. The only discussion of multiple-use trade-offs occurs on page 1-9, stating "These multiple-use trade-off determinations are made during the RMP-EIS process." It appears that the only multiple-use trade-offs made were by letting uses other than coal production occur on lands that did not contain producible coal reserves. An example of a Resource Management Plan that did examine multiple-use trade-offs is the North Dakota RMP and EIS. We recommend that you take a close look at this document when preparing the Final EIS.

31 The Federal Coal Management Program EIS of 1979 also requires that thresholds be established on impacts to a variety of other resources. Since this concept was not superseded by anything in the 1984 Supplement to the EIS, it is still in effect. We maintain that the RMP must address thresholds particularly for wildlife and socioeconomic capabilities of the surrounding area.

46 The Secretarial Issue Document of 1986 requires that the RMP assess the coal development potential of the area. The reason that this should be covered in the RMP is so that leasing levels can be in line with demand levels. The Uncompaghe Basin RMP states on page 4-44 that "The available leasing of up to 5,730 million tons of coal would far exceed demand over the life of this plan as the 1985 coal production from Delta and Owsen counties was 2.2 million tons and optimistic annual coal production forecasts for this area range from 4.5 to 7.35 million tons for the years 1992 to 2000." The plan continues on page 4-45 to state that "this [preferred] alternative is not anticipated to impact coal production levels over the life span of the plan." The plan blatantly ignores the realistic coal development potential of the area, and needs to be reworked.

45 The Secretarial Issue Document (1986) also requires the BLM to give "increased emphasis" to six criteria that other agencies, the OFW, and public interest groups wanted added to the unsuitability criteria. Among these other criteria are effects coal mining will have on wetlands/riparian habitat, sole-source aquifers, lands adjacent to Class I air quality areas.

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adequate criteria for determining tract disposal. The Grand Junction RMP included 17 criteria which would automatically warrant retention of the tract. The criteria are as follows:

1. Wilderness areas and wilderness study areas
2. National conservation areas
3. Wild and scenic rivers and wild and scenic study rivers
4. National or historic trails
5. Natural or research natural areas
6. Designated areas of cultural or natural history
7. Designated areas of critical environmental concern
8. Designated wild horse preserves
9. Other congressionally designated areas
10. Threatened or endangered species habitat areas
11. Riparian habitat areas
12. Valuable recreation areas
13. Wetland Areas as defined in Executive Order 11990 5/77
14. Flood plain areas (100 year) as defined in Executive Order 11988 5/24/77
15. Large blocks of land that are suitable for multiple use management
16. Lands containing water sources with valid existing water rights held by the BLM
17. Critical range

There are also criteria for areas with high mineral potential. We maintain that the criteria used in the Grand Junction RMP is much more useful and thorough than the 5 criteria used in the Uncompaghe RMP presented on page 1-4.

Changes in Management Prescriptions

We recommend the following changes in the mandates for the preferred management prescriptions in addition to the comments made through the rest of the letter:

62 The D-6 management prescription should include a recommendation to acquire land in Red Canyon in order to have a more logical and ecologically sound boundary for the proposed Gunnison Gorge Wilderness Area.

119 We commend the BLM on realizing the significance of the Riparian areas within the Resource Area, but feel the agency has not gone far enough in insuring the protection of riparian areas. The D-8 prescription needs to allow the agency to implement a policy which will improve the quality and vitality of riparian areas. We support stricter limits for livestock use in these fragile areas, since livestock is probably the single greatest cause of deterioration of riparian habitat. The Plan,

45 reclaimability and buffer zones around National Park Service areas. None of these criteria were examined thoroughly in the Plan. In fact, the plan only briefly mentions riparian areas and makes the following statement in regards to aquifers on page 4-43, "The mining of coal and locatable minerals could result in the permanent and irreversible loss of ground water through diversion and subsidence," which we find totally unacceptable. Basically, the BLM needs to conduct not only a much more thorough investigation into these six criteria but also into the entire federal coal management program in the Resource Area.

Oil and Gas

The section on oil and gas impacts is inadequate. The court case of *Connor v. Burford* states "comprehensive analysis of cumulative impacts on several oil and gas activities is required before a single activity can proceed." The preferred alternative of the Plan dedicates only seven paragraphs to the impacts of oil and gas leasing and only one of those paragraphs deals with cumulative impacts. No leasing was recommended only for the Gunnison Gorge, an area recommended for Wilderness. No Surface Occupancy was recommended for the Needle Rock Outstanding Natural Area. It appears that the BLM has chosen to ignore its legal mandate under *Connor v. Burford*. Another part of judge's decision is applicable here, stating that federal agencies "have initiated a pattern of procrastination, not examination of environmental concerns." The BLM is capable of doing an adequate job of assessing impacts, so why not do it? The Plan should also mandate that all ACECs and other natural areas receive for a minimum 60 Surface Occupancy stipulations.

47 The section on oil and gas impacts is inadequate. The court case of *Connor v. Burford* states "comprehensive analysis of cumulative impacts on several oil and gas activities is required before a single activity can proceed." The preferred alternative of the Plan dedicates only seven paragraphs to the impacts of oil and gas leasing and only one of those paragraphs deals with cumulative impacts. No leasing was recommended only for the Gunnison Gorge, an area recommended for Wilderness. No Surface Occupancy was recommended for the Needle Rock Outstanding Natural Area. It appears that the BLM has chosen to ignore its legal mandate under *Connor v. Burford*. Another part of judge's decision is applicable here, stating that federal agencies "have initiated a pattern of procrastination, not examination of environmental concerns." The BLM is capable of doing an adequate job of assessing impacts, so why not do it? The Plan should also mandate that all ACECs and other natural areas receive for a minimum 60 Surface Occupancy stipulations.

Tract Disposal

85 The BLM has not outlined sufficient criteria for determining tracts suitable for disposal. This can be seen through some of the tracts slated for disposal such as the West Dallas Creek tract (T.44 N., R.1 W. Sections 4 & 9). This area receives heavy recreational use also located on a county highway. The tract is located on one of the main access points to the Mt. Sneffels Wilderness Area, and obviously should be sold for recreation. Another poor selection as a disposal tract is the Baldy Peak Area (T.43 N., R.8 W. Section 36). Baldy Peak is a former Wilderness Study Area which has the potential to be a future addition to the Big Blue Wilderness Area. The Muddy Creek tracts above Panna Reservoir also have heavy recreational use. The tract provides important public access points along Colorado Highway 133.

Obviously, the Uncompaghe Basin Resource Area has not devised

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however, must address the site specific impacts of coal development on riparian and aquatic areas as required in the Secretarial Issue Document (1986). Mineral development can also have significant impact of riparian areas, thus this mineral development (including oil and gas as well as coal) should be minimized.

69 We oppose the aki area proposed for Storm King Mountain under the D-10 management prescription. The D-10 area should be managed for elk habitat, and timber harvesting should be prohibited. Storm King is not only fantastic elk habitat, it is also an important scenic vista for such of the upper Uncompaghe Valley. The natural character of the area should also be maintained for this reason.

28 We have serious concerns for the resource use which would be permitted in the D-12 and D-13 management prescriptions. Escalante Canyon is being recommended for an Area of Critical Environmental Concern and Fairview is being recommended for a Research Natural Area because of their outstanding biological characteristics. It is amazing that the BLM realizes the significance of these areas, but allows potentially destructive activities to these lifelines to occur in the areas. The BLM should prohibit grazing in the areas and the BLM should have the ability of destroying the rare plants that are found in these areas. The livestock should also be placed on the areas to prevent potentially destructive mining and the possible converting of important lands to private lands using the claim and patent system. A No Surface Occupancy stipulation should be placed on all oil and gas leases which may cover the area to protect the areas from damage due to oil and gas development.

The BLM should also strictly control recreation especially in the Escalante Canyon ACEC. Camping and bathing should be banned. Outdoor recreational use can also damage the endangered plant species.

Wilderness

The Colorado Environmental Coalition supports the designation of the Camelback, Adobe Badlands and Gunnison gorge as Wilderness. All three areas easily qualify for Wilderness protection and are deserving of designation.

Gunnison Gorge

The Gunnison Gorge is one of the premiere primitive recreational areas in the state. In the area receives substantial boating, hiking and fishing use. Gunnison Gorge is immediately downstream from the Black Canyon of the Gunnison National Monument's Wilderness area, and would make a significant addition to the area.

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The Gunnison River has also been recommended for Wild River designation under the Wild and Scenic Rivers Act through the Gorge. The Gunnison Gorge is obviously one of the highest candidates for Wilderness protection in the state of Colorado.

Adobe Badlands

These Mancos Shale badlands, located just a few miles north of Delta, are among of the most scenic places in the resource area. The badlands provide excellent vistas and are habitat for the endangered Ginta Basin hookless cactus. Since four oil and gas wells have been drilled near Adobe Badlands and all have been dry, the area also has low oil and gas development potential. Other conflicts with wilderness designation are also low. The plan that it intends to prohibit off road BLM status in the area. If designated as wilderness, Adobe Badlands would diversify Delta's recreational opportunities and improve its tourist economy. The BLM does not really have a rationale for not recommending the Adobe Badlands for wilderness, and needs to reevaluate this decision.

Cameleback

Cameleback has absolutely no conflicts to Wilderness designation. Wilderness designation would be compatible with the current management of the area. The Uncompahgre Plateau is one of the major landforms of western Colorado, but not one acre of it has been designated Wilderness. Although officials of the BLM have often claimed that Dominguez Canyon proposed wilderness to the north of Cameleback is almost identical to Cameleback, we have found the areas to be quite different. Cameleback has a much greater diversity of rock formations that are not present in Dominguez Canyon, making the areas look much different. Cameleback contains habitat for the endangered spineless hedgehog cactus and the rare Grand Junction milkwitch. The area is being considered for desert bighorn sheep reintroduction and for improvement of its riparian habitat in this plan. Both of these activities would be consistent with wilderness designation. Cameleback is rare among BLM Wilderness Study Areas in that it also has a well developed network of trails making the area ideal for backcountry recreational use. The BLM has obviously erred in its recommendation of Cameleback and should support the area for Wilderness designation.

ORV Use

The BLM has not effectively dealt with Off Road Vehicle (ORV) use in the plan. The prospect of having 82% of the area (ORV) open to uncontrolled ORV use is frightening. We support substan-

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67 tial reductions in the amounts of land, where ORV use would be permitted. It is especially disturbing to see the D-8 management prescription (geared to ORV use) being located in habitat for the endangered Ginta Basin hookless cactus. This is obviously in violation of the Endangered Species Act. The plan admits that ORV use will have substantial adverse impact on soils, water, and vegetation. Much greater restraints must be implemented for ORV use.

Utility Corridors

68 Although existing utility corridors were described in the plan (p. 2-24), no information was provided on where new utility corridors would be permitted. We support delineation of where utility corridors would be permitted. Restriction should be placed on all Wilderness Study Areas, Outstanding Natural Areas, Research Natural Areas, and Areas of Critical Environmental Concern prohibiting utility corridors.

Threatened and Endangered Species

69 It appears from the lack of information in the plan that the BLM has not conducted a survey of its lands to identify areas which contain threatened and endangered species. The BLM should include in the plan a mandate for conducting a study for not only threatened and endangered species habitat but also to identify remnant plant communities. Provisions should be made to amend the plan when this information has been collected.

70 We appreciate this opportunity to comment on the plan, and hope that the agency will be responsive to our suggestions. Dramatic changes need to occur in order to make this plan acceptable.

Sincerely yours,

Kirk Koepsel
Kirk Koepsel
Public Lands Coordinator

7

October 29, 1987

Mr. Robert Vecchia
RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management

page two

In conclusion, RMGA supports the Preferred Alternative as proposed by the BLM. However, we believe it is critical for the BLM to adopt our recommendation activities, and the procedures by which these activities are allowed to occur.

We appreciate the opportunity to provide our comments. If you have any questions or would like to discuss our comments in greater detail, please do not hesitate to contact us.

Sincerely,

Jess Cooper
Jess Cooper
Executive Vice President

JC:cw

1860 Lincoln Street, Suite 404 • Denver, Colorado 80202
303/860-0099

October 29, 1987

Mr. Robert Vecchia
RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management
2502 South Twentieth Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to offer the following comments on the Draft Uncompahgre Basin Resource Management Plan (RMP) and Environmental Impact Statement (EIS). RMOGA is a trade association with hundreds of members who account for more than 50% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Consequently, we review all draft plans in this region to determine whether they provide equitable and reasonable treatment of mineral resources.

We would like to commend the BLM on its preparation of a clear, concise draft RMP and EIS. We believe the plan as proposed represents a balanced approach to land management planning which adheres to the multiple-use concept mandated by Bureau policy. However, the BLM's decisions are readily displayed and are easily understood by the reader. The use of oil and gas stipulations to protect other resource values appears to be reasonably well-balanced, and not designed to unduly constrain oil and gas activities in favor of other values.

8 We are disturbed by the lack of information displayed in the OEIS regarding oil and gas activities. We believe that in order to have a totally defensible oil and gas activities are conducted on public lands. Specifically, the stipulations and regulations which industry and the BLM must comply with regarding the leasing, exploration and production activities should be generically discussed in the document itself, or in an appendix. Such discussion informs the public how oil and gas activities are allowed to occur on public lands, and the process by which such activities are mitigated and approved.

Minerals Alliance
in Public Policy
Mining Address
Box 119
707 South Arapahoe Court
Lawrence, Colorado 80526
(303) 624-4710

Reply to 18
Lawrence, Colorado
L.C. Lee
Washington Representative
L. Cleveland Lee
614 West Street
Lawrence, Missouri 64503
(317) 830-782

Page 2
October 29, 1987
EJL

October 29, 1987

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
3305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

The following comments constitute the response of the Minerals Exploration Coalition (MEC) to the Uncompahgre Basin Resource Management Plan and Draft Environmental Impact Statement (DEIS). The MEC represents companies and individuals engaged in exploration for locatable minerals on the federal lands.

The MEC supports the management goals of multiple use, giving consideration to all renewable and nonrenewable resources, including minerals.

We do not believe that sufficient mineral data has been collected or weight given to mineral resources to allow fair consideration of minerals in the management plan. Without a complete set of data on the mineral resources showing the location and extent of past and current mineral production and potential for future exploration and production, the importance of these minerals to the citizens of Colorado and the United States cannot be recognized. While the areas of past mineral production and areas with potential for future production are mentioned in a general way on pages 3-3 and 2-4 a map showing location and extent of these areas was not prepared. No rating of the mineral potential is shown for areas outside the USA. Within the USA, maps showing the location of the areas rated is lacking.

The absence of mineral data in comparison with the data on other resources is particularly evident when one considers the economic data shown in Table F-1, Appendix F, page A-19. This table shows that, except for government, minerals provide the largest source of personal income to the citizens of the region. Detailed information for some resources is included in the appendix but not for minerals. How can the largest source of non-government income be omitted?

The Minerals Exploration Coalition opposes the inclusion of areas of high and moderate mineral potential in wilderness areas because the opportunity to explore for and produce minerals is prohibited in wilderness areas, except where prior existing rights can be shown. The boundaries of the wilderness study areas that include moderate potential of mineral potential should be changed to exclude the mineralized areas at the USA should not be recommended for wilderness designation.

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
2808 South Townsend Avenue
Montrose, Colorado 81401

Dear Sir:

The Audubon Society of Western Colorado appreciates the opportunity to comment on the Uncompahgre Basin RMP and EIS. We offer the following comments and suggestions:

1. We believe the conservation alternative rather than the preferred alternative would better serve the national interest in almost every detail. We applaud your decision which incorporates elements of the conservation alternative into the preferred alternative.
2. The conservation alternative recommends a wilderness designation for the Adobe Badlands USA and for the Camel Back USA, but the preferred alternative does not include this recommendation. We believe this omission is a mistake. We support any action which will enhance the preservation of wilderness values, as this designation would. The economic advantages gained by these areas as wilderness are short-term and negligible in comparison.
3. If the Camel Back area is not to be designated as wilderness, off-road vehicle use in the area should be prohibited nevertheless. The EIS states that ORV use would be the primary cause of decline in wilderness values under the preferred alternative. This alternative provides enough area for ORV use without allowing such use to destroy the wilderness value of the Camel Back USA.

The Geology, Energy and Minerals (GEM) reports are cited as the basis for the determinations of mineral potential in the USA and the wilderness potential. No reference is made to the required mineral surveys conducted by the U. S. Geological Survey and U. S. Bureau of Mines. The USGS/GEM mineral information should be available before wilderness decisions are made.

To show that mineral activities will be allowed on most (generally to access 90 percent) of the land, thereby implying that most of the mineralized land will open, is misleading when considering the lands to be withdrawn under the various alternatives. Minerals are unevenly distributed, therefore, without specific information on the location of the minerals, one cannot determine the impact on the mineral industry of these proposed withdrawals.

We have not made a select of our preferred alternative because without adequate minerals we cannot make an intelligent choice.

Thank you for the opportunity to comment on this plan.

Sincerely,

John D. Wells

John D. Wells,
President

The AUDUBON SOCIETY
of Western Colorado
Box 119
707 South Arapahoe Court
Lawrence, Colorado 80526

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
2808 South Townsend Avenue
Montrose, Colorado 81401

Dear Sir:

The Audubon Society of Western Colorado appreciates the opportunity to comment on the Uncompahgre Basin RMP and EIS. We offer the following comments and suggestions:

1. We believe the conservation alternative rather than the preferred alternative would better serve the national interest in almost every detail. We applaud your decision which incorporates elements of the conservation alternative into the preferred alternative.
2. The conservation alternative recommends a wilderness designation for the Adobe Badlands USA and for the Camel Back USA, but the preferred alternative does not include this recommendation. We believe this omission is a mistake. We support any action which will enhance the preservation of wilderness values, as this designation would. The economic advantages gained by these areas as wilderness are short-term and negligible in comparison.
3. If the Camel Back area is not to be designated as wilderness, off-road vehicle use in the area should be prohibited nevertheless. The EIS states that ORV use would be the primary cause of decline in wilderness values under the preferred alternative. This alternative provides enough area for ORV use without allowing such use to destroy the wilderness value of the Camel Back USA.

The preferred alternative also aims to 'minimize disturbance' in this area to enhance habitat for introduction of bighorn sheep. Allowing ORV use would certainly hamper this goal. Further, although the preferred alternative provides for bighorn habitat management, it fails to allocate forage for these animals. This failure could easily lead to the failure of the re-introduction.

4. The preferred alternative for the Camel Back area is confusing. The map for this alternative seems to label the area "B-1," which "would be managed to improve vegetation conditions and forage availability for livestock grazing." The description of Management Unit B-1, under the sub-heading "Soils and Water Resources," states that "nonconflicting erosion control objectives, projects and mitigating measures would be incorporated." The "Comparison of Alternatives" chart, however, states that the plan is to "manage the Camel Back area with emphasis on riparian-aquatic system management, wildlife habitat and livestock." We hope that the real priority is that described in this chart (if a wilderness designation is not forthcoming). At any rate, the designation needs to be clarified.

5. The preferred alternative takes the second-best approach to managing the Adobe Badlands area north of Delta. It is wise to put soil erosion control as the primary objective. Wilderness designation for the area, however, would also meet that objective and would protect wilderness values as well.

6. The Wilderness Technical Supplement states that "the Proposed Action is based on an overall evaluation of wilderness values, analysis of conflicts with other resources, consideration of social and economic factors, and consistency with other plans." None of these evaluations, analyses, or considerations are discussed in the RMP. It is impossible for the public to provide adequate input on RMP decisions when the bases for these decisions are unknown. An analysis of the alternatives, such as that provided in the LEIS PART I EIS, would be most helpful. Because the Uncompahgre Basin plan contains no such analysis, it seems reasonable to request an amendment that includes this information and time for the public to respond to it.

Sincerely yours,

Richard Leard

Richard Leard
Conservation Committee
Audubon Society of Western Colorado



Sierra Club

Rocky Mountain Chapter

TO EXPLORE, ENJOY AND PRESERVE THE NATURAL WORLD: WATER, WILDLIFE AND WISDOM...

Robert E. Vecchia
 Bureau of Land Management
 Uncompangre Resource Area
 2505 S. Townsend Ave.
 Montrose, Co, 81401
 Nov. 1, 1987

Dear Sir:

The following comments on water quality/soils/riparian aspects of the Uncompangre Draft RMP and EIS are made on behalf of the Rocky Mountain Chapter.

This draft document correctly indicates that parts of (R2) the Resource Area are plagued by moderate to severe soil erosion, leading to a substantial contribution to salinity levels in the Upper Colorado River Basin, as well as sediment. The document correctly states that about half of the dissolved and suspended water pollution is due to human activities, particularly poor grazing practices, mining, and ORV use.

The projected impacts on water resources of the Preferred Alternative also appear to be candid and correct, although the discussion of the impacts in the text is by no means clear. Impacts that are especially important to us are: permitted grazing on 39,000 acres of highly saline and erodible soils during the spring season, year-long ORV use

2239 E. Colfax Avenue, Denver, CO 80208 303/321-9292

Provided that reasonable measures are taken by the BLM to protect soils and riparian zones in its grazing and ORV management programs, the Rocky Mountain Chapter would like to express its willingness to explore volunteer stream restoration projects with the BLM staff, as we have done in other areas.

Thank you for your consideration of these opinions.

Sincerely,

 Mark Cunningham
 Conservation Chairman
 for Trout in the
 Mountains, Inc.

40 On 25,000 acres of highly erodible and saline soils, and cancelling withdrawals for mineral exploration on 4,000 acres of riparian habitat. Our reason for these concerns may be stated succinctly: "Clean water is probably (with the possible exception of steel fish) the most economically important 'byproduct' from the Uncompangre Resource Area. In riparian, ORV and other recreation, local wildlife, and grazing are insignificant in the context of the whole Colorado River Basin. In this context, grazing, ORV recreation etc. are of local value only, whereas decrements in water quality parameters adversely affect the ecology of the basin and the wellbeing of millions of people. Therefore, the BLM must be much more aggressive in limiting uses that adversely impact soils/riparian habitat. Since the EIS appears to give at least a tenth-order approximation to a proper discussion of impacts, we urge the BLM to make the following changes in its management plan:

- A. Reconsider the permitted season-of-use for livestock utilization of riparian areas and erodible areas in general. The ranch through way restrictions may not allow sufficient time for soil moisture and vegetation growth to decrease. Studies in other areas have shown that less than 10% soil moisture is necessary to prevent bank damage and soil compaction (See Delta Technical Reference on Grazing Management in Riparian Areas, Sept. 1987, Gene Klein, BLM, Grand Junction District) and that this level of soil moisture is not reached until late July, on average.
- 40 B. Grazing and ORV use should be absolute prohibited on saline and easily erodible soils. A possible exception might be for certain grazing systems, but if, and only if, the permittee and the agency through a credible monitoring program, can demonstrate to the public that the particular grazing system employed can increase the extent and vigor of ground cover and decrease erosion.
- C. Mineral exploration and development, whether leased or placed, must not be permitted in or near stream channels under any conditions. The BLM must not withdraw existing withdrawals protecting stream channels and should initiate new withdrawals, if true an necessary, to protect water quality and stream hydrology.

Despite numerous deficiencies in the Uncompangre RA Plan and EIS as a planning document, one aspect that can be applauded is the decision of "emphasize areas" for riparian habitat management.



November 4, 1987

ROBERT E. VECCHIA, RMP TEAM LEADER
 Bureau of Land Management
 Uncompangre Basin Resource Area
 2505 South Townsend Avenue
 Montrose, CO 81401

FROM: DELTA COUNTY LIVESTOCK ASSOCIATION
 John Betti, President
 P. O. Box 15
 Crawford, CO 81433

SUBJECT: UNCOMPANGRE BASIN RESOURCE MANAGEMENT PLAN - COMMENTS

The Delta County Livestock Association is in agreement that the Camel Back, the Adobe Bedlands and the Gunnison Gorge should continue to be managed as they now are by the BLM and prefer the no action alternative.

136 The 10,402 acre Camel Back area should continue, as it now is, under multiple use management. The area does not have the suitability for a Wilderness designation. The management plan now implemented is working well and the vegetation has already increased along the Southside River and Foster and Monitor Creeks.

For several months each year these streams are dry. Damage by flash flooding governs plant growth along stream beds, not grazing by livestock. Because of the terrain, this area is subject to several flash floods each year.

111 Introducing big horn sheep into the area would only compete with the Jar and elk using these winter ranges. Private lands would be swarmed by these animals needing forage in the winter.

131 The 680 AUMs allocated for livestock grazing should remain unchanged.

138 Neither is the Adobe Bedlands suitable for Wilderness. All these natural resources should be utilized under multiple use and the 878 AUMs allocated to livestock grazing should remain the same.

66 The Gunnison Gorge should also continue under multiple use. Proper management increases riparian habitat. The 461 AUMs currently allocated for livestock grazing should not change.

One reason these lands are being suggested as Wilderness Area is because the rancher appreciates the land and its value to the area. Thus they have properly utilized and managed them in cooperation with the BLM.



Sierra Club

Rocky Mountain Chapter

TO IDENTIFY, PROTECT AND PRESERVE THE NATURAL
VALUES, WILDLIFE, VEGETATION AND WILDERNESSES.

November 3, 1987

Bene Vecchia
RPP Team Leader
Bureau of Land Management
Uncapchopre Basin Resource Area
2085 South Townsend Ave.
Norrise, CO 81641

Dear Gene:

Enclosed are comments for the Rocky Mountain Chapter of the Sierra Club on the Draft Uncapchopre Basin Management Plan and EIS, and the accompanying Wilderness Technical Supplement (WTS). The Sierra Club currently has over 8,200 members in Colorado, many of whom make recreational use of public lands administered by BLM in the Uncapchopre Basin Resource Area.

WILDERNESSES

The Sierra Club has several general concerns with BLM's analysis of wilderness resources in the DEIS and WTS. A major concern appears on the very first page of the WTS (B-1) where BLM notes that "multiple-use management would include non-wilderness designation of Camel Back MSA. Is BLM aware that wilderness, and the resources it protects, is a form of multiple use?" Is BLM aware that the Wilderness Act itself (Section 4(a)(1)) of PL 89-677 specifically amends the Multiple-Use Sustained-Yield Act to note that wilderness is not inconsistent with multiple-use?

Another concern centers on the presentation of information. Nowhere is any rationale given for BLM's wilderness recommendations, some of which seem to fly in the face of reality. It would tremendously improve the ability of the public to intelligently comment on BLM's management proposals if we had some inkling of the thinking behind these proposals.

The Sierra Club strongly endorses the BLM's preferred alternative recommending all of Bunnison Gorge MSA for wilderness designation. Wilderness designation will greatly enhance BLM's previous recommendation of the Bunnison River through the MSA for Wild and Scenic River protection and will also provide additional incentive for ongoing efforts to secure legislation that formally designates both the river as Wild and Scenic and the MSA as wilderness.

2239 E. Colfax Avenue, Denver, CO 80206 303/321-6292

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BLM's unsuitable recommendation for Camel Back MSA, however, appears to us to be without merit. The Wilderness Technical Supplement makes clear that there are no resource development conflicts with timber or mineral resources. Similarly, the current inaccessibility of the area has thus far insulated it from significant conflicts with ORV use. On the other hand, there is an impressive array of wilderness dependent values present in the MSA, many of which have not been noted. These include crucial big game winter range, habitat for threatened and endangered species such as golden and bald eagles as well as rare plants and plant associations, a substantial perennial stream, the Ben Low Cabin historic site, stunning scenery, and uncommon geologic features such as hoodoo. By BLM's definition, Camel Back has all of the requisite requirements for a wilderness, and few conflicting resource demands. The area also faces likely future degradation of its wilderness values without wilderness designation, as the WTS notes, in the form of intrusions by ORVs such as all-terrain-vehicles. All of these, coupled with the excellent habitat values, and the area's compact topographic boundaries, indicate that BLM should recommend Camel Back as suitable for wilderness designation.

One particularly unique aspect of Camel Back is its position as an integral part of the longest intact roadless drainage on the entire Uncapchopre Plateau. The 7 or 8 miles of Roundbuck Creek within the MSA, when combined the 15 miles of undeveloped canyon on the adjacent upstream National Forest, make this drainage the only continuous, roadless drainage that comprises the full range of ecosystems present on the Uncapchopre Plateau. From the aspen-spruce forests of the plateau to the riparian areas of the canyon, the drainage provides a diversity of ecosystems? Surely, ecosystem protection is one of the greatest priorities of the National Wilderness Preservation System, and Camel Back is a rarity in providing such a distinctive opportunity. As a landform (the Uncapchopre Plateau) which currently has no designated wilderness, has BLM taken the non-wilderness designation of the Roundbuck MSA as a means to mean that Congress approved wilderness protection for this drainage? If BLM has, then it is in violation of Congressional intent as spelled out in the committee report which accompanied the 1980 Colorado Wilderness Act.

The only potential conflict with wilderness designation of Camel Back that was identified at public hearings was with livestock grazing, livestock over the issue of finding additional water sources for livestock outside of the Roundbuck Creek riparian area. First of all, the Sierra Club strongly supports the reduction in forage utilization to 35 percent on 400 acres of riparian zone in the MSA (BTS at 2-2). It is obvious to even the most casual observer that the Roundbuck Creek riparian zone has been thoroughly trashed by livestock use. The ranchers present at the Montrose hearing indicated that they thought

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this would be a hardship on them, though it might be easily alleviated through more active management of the livestock herds in the riparian zone rather than simply leaving the livestock to simply drift along the creek. None of these ranchers also indicated that this hardship could be greatly relieved if additional water sources were made available on Winter Mesa. If, indeed, the primary conflict with wilderness designation of Camel Back is the issue of grazing in the riparian zone of Roundbuck Creek (though this does not appear to be the case since BLM is proposing a reduction even in the no wilderness alternative), then BLM would be wise in not considering an alternative in the WTS that proposes wilderness designation for the majority or all of the MSA while leaving riparian zone water sources for livestock on Winter Mesa. Will BLM consider such an alternative?

What is the meaning of the statement that grazing allocation in Camel Back will be reduced from 400 AUMs to 400 AUMs, which would be managed under an intensive grazing system? Does BLM intend to implement an HRM intensive grazing system for these allotments?

The Sierra Club supports wilderness designation for Adobe Badlands MSA. As with Camel Back, there are no substantive reasons for BLM's non-suitable recommendation given in the DEIS or WTS. Mineral, timber, livestock grazing, and ORV conflicts are all minimal or nonexistent. Wilderness designation of Adobe Badlands would greatly enhance the diversity of the National Wilderness Preservation System by incorporating an area of unique riparian life. In other instances in Colorado where BLM has had the opportunity to protect an example of such an ecosystem, such notably in McKenna Peak MSA and Little Bookcliffs MSA, BLM has singularly failed to act on behalf of wilderness diversity. Is there any inherent reason why Mancoas Shale badlands are unsuitable as wilderness that BLM has not told us?

COAL

The DEIS does not seem to offer such a range in the alternatives for future coal leasing. With the exception of the current management alternative, all of the alternatives propose the same amount of acreage available for future leasing (i.e. 200 acres). This seems particularly inappropriate since the RPP/DEIS notes at 1-9 that the RPP-EIS process is when multiple-use trade-off determination is to be made. It is hard to believe that in the Conservation Alternative, for example, that development of coal within other resources as well as it does in the production alternative. While BLM may have actual coal reserves in the area, it is not clear that BLM has given the impact that coal development might have on wildlife, water quality, and other such resources offsite. The alternatives need to be revised to reflect this.

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STORN KING PEAK SKI AREA SITE

The RPP/DEIS is completely inadequate with respect to its treatment of the proposed Storn King Peak Ski Area. BLM falls all over itself trying to get off the way of making any sort of a decision about the most appropriate resource use of Storn King Peak. BLM's own direction in the RPP/DEIS (11-3) states that it should determine whether "development of Storn King Peak Ski Area would be compatible with wildlife habitat, timber production, and coal production." The decision in the proposed RPP comes nowhere near fulfilling this criterion. Instead, BLM offers us some silly science to allow the development of the ski area for five years hence, after which BLM might change its mind and not allow development. What kind of management guidance is this? BLM is fairly specific about the impacts of the proposed ski area on wildlife, noting that the ski area would eliminate suitable elk calving habitat and impact mule deer farming (14-34). That seems a fairly clear statement concerning compatibility of the ski area with wildlife habitat. BLM should make a definite management decision based on this information, either in favor of the ski area or opposed to it. The Sierra Club urges BLM to oppose the ski area, and to reject it by finding it to be an incompatible use of Storn King Peak in the context of multiple-use resource trade-offs in the RPP. We wonder why BLM seems so intent on justifying the ski area proposal since not a drop of support was offered at any of the public hearings for the proposed area, and since the proponents were not even interested enough in the proceedings to attend any of the hearings.

We would also submit that if BLM insists on accommodating this phantom ski area proponent, then BLM should demand evidence of financial capability from the proponent.

On one final note, the RPP/DEIS has a significant oversight in failing to include in the Preferred Alternative "Impacts on Territorial Wildlife Habitat from Resource Management" (4-32) any mention of the impacts to elk and mule deer from development of the proposed Storn King Peak ski area.

RECREATION

We commend BLM for incorporating the excellent work that has already been done in developing the Storn King Peak in the context of multiple-use Resource Area into the proposed RPP (15-34). However, Recreation is the rationale for removing the mineral withdrawal for these same lands? We wonder that there are any lands under "Resource Management" at all. The development of these lands, so why the revocation? Despite their low mineral potential, there still exists the possibility for claims to be staked and surface development to occur that would have an adverse

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41 impact on the dominant recreational values present. And how in the world can BLM claim that revoking the mineral withdrawing and opening these lands to the hackneyed approach of the 1877 Mineral Law enhances "tourists land development". This is not to be double-speak if anything! Leaving the Gunnison Gorge SRPA closed to mineral development is as certain a form of long-term land use planning as one could devise.

The Sierra Club supports BLM's recognition of the growing demand for river recreation through its proposal to enhance river access for the lower Gunnison River at Escalante Bridge and to provide informational materials on river use (RPP/DEIS at 3-32).

LAND DISPOSAL

84 The Sierra Club finds the stated criterion for assessing the potential for disposal of RPP/DEIS at 3-38 greatly lacking in their protection of the public interest. The approach taken by the Grand Junction Resource Area in the Grand Junction RPP, listing 17 criteria that would automatically warrant retention of tracts of public land, provides far greater protection for public interests. The Uncompahgre Basin RPP should adopt a similar set of criteria.

Several of the tracts identified for potential disposal do not meet the criteria for disposal as stated in the RPP/DEIS. One such tract is the public land along Mustang Dallas Creek (7-44N, R. 9W, sections 4 & 9). This tract possesses significant public values in the form of riparian habitat and recreational opportunities. It is located on a county road that provides access to the Mt. Sneefield wilderness, and it provides for public camping areas in a valley that is almost entirely otherwise controlled by private interests. We do not see any circumstances under which this tract should be passed out of public ownership.

85 Two other tracts include the former Baldy Peak WMA (7-42N, R. 8W, section 24) and a tract along Cow Creek (7-42N, R. 7E, sections 9 and 10). Both of these should only be disposed of if passed on to the U.S. Forest Service. Baldy Peak represents a potential addition to the existing Big Blue Wilderness, while the Cow Creek tract offers public access to the creek arid one of the most scenic and popular locations in the Uncompahgre Mountains.

RIPARIAN HABITAT

The Sierra Club supports BLM's recognition of the importance of riparian zones through the development of the "D-9" management prescription in the preferred alternative.

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TRANSPORTATION

We support BLM's proposed closure of the Potter Creek road and the Dry Fork of Escalante Creek road (RPP/DEIS at 3-38). There are far too many roads on the Uncompahgre Plateau at present. Closure of these should enhance wildlife habitat as well as provide for greater prescriptive recreation opportunities.

84 The RPP/DEIS should incorporate an analysis of the impacts of blanket R22477 Right-of-Way grants to Delta and Montrose counties. The RPP is the appropriate document for evaluation of the transportation needs of the Resource Area, and since R22477 grants are a significant component of access to and through public lands, they should be included in the RPP. Any grants given to the counties should be limited to the width of the actual use at the time of the enactment of PLRPA in 1976. BLM might also be aware of the fact that its procedure for allocation of R22477 grants is currently under litigation in federal court in two states, Alaska and Utah.

We appreciate the opportunity to comment on the proposed RPP and DEIS, and look forward to your consideration of these comments.

Sincerely,

Mark Pearson

Mark Pearson
Chair, Rocky Mountain Chapter, Sierra Club
P.O. Box 204
Grand Junction, CO 81502

COLORADO NATIVE PLANT SOCIETY

P.O. BOX 200 • FORT COLLINS, COLORADO 80522

...a division of the Sierra Club...

November 1, 1987

Mr. Robert Vecchie, RPP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchie,

The Colorado Native Plant Society submits the following comments on the Draft Uncompahgre Basin Resource Management Plan and EIS. We have conducted a number of field trips in the Resource Area, and are aware of the important botanical resources present.

Each of our reviewers commented, independently, on the difficulty of reviewing this document because of its format and organization. It is cluttered, with frequent inconsistencies, that complicate among alternatives is difficult. This plus inadequate delineation of Management Units in the very poor maps makes it nearly impossible to evaluate recommendations for a given area. We also note that the Impact statements (Chapter Four) are written to present primarily favorable aspects and negative impacts are minimized or (mostly) ignored. Table 4-21, a subjective "Comparison of alternative impacts," is absent. The draft RMP should be thoroughly revised and resubmitted as a second draft, with additional opportunity for comment provided.

103 We appreciate the RMP's recognition of the threatened, endangered, candidate, and BLM-sensitive plant species present in the Resource Area. The special vegetation resource of the Gunnison Gorge also are acknowledged, but no recognition or consideration is given to state-sensitive plants or recent plant communities elsewhere in the Resource Area. This omission should be rectified by consultation with the state Natural Areas Program. The draft RMP is seriously deficient in this respect, inasmuch as the existence of such resources should affect proposed management in several Management Units, and may warrant designation of additional Special Management Areas.

135 Because of its significance as habitat for a number of these valuable plant resources, it is vital that sizeable areas of noble bedlands be maintained in an essentially undisturbed condition. It is clearly unacceptable that the Preferred Alternative propose to allow OUV use that "...would reduce potential habitat of threatened and endangered species" (page 4-50). Why, then, are these "threatened wilderness values" not to be recommended for wilderness preservation? Please reconsider, and include both Adobe bedlands and Camel Back as recommended for wilderness status.

27 We also ask that the statement of intent to require resources to protect threatened and endangered species in land use activity plans (page 3-3) be amplified to specify that this intent also includes BLM-sensitive and state-sensitive plant species and plant associations.

Mr. Vecchie
page 2

27 The final RMP must be changed to omit the proposed North Delta OUV use area, development of which will destroy many such plants.

67 The impact of OUV use on Mexico shales is undeniable; such use must be prohibited, not merely restricted, in additional areas. Closure of only 25% of the Resource Area to OUV is insufficient. Additional closures would benefit not only plant resources, but would reduce the adverse impacts that the proposed levels of OUV use admittedly will have on air quality (page 4-44), soils (4-48), water resources (4-50), riparian zones (4-50), soil E species (4-51), wildlife habitat (negative impacts of open OUV use not noted, p. 4-52 and 4-54), livestock grazing (4-54), cultural resources (4-57), and visual resources (4-58).

116 The limited but highly significant riparian vegetation of the Resource Area receives insufficient attention in the Draft RMP. The final plan should more clearly identify this important habitat, and spell out management tools that will be employed to restore and maintain it. The very small acreage involved (approximately described as 1,034 acres (Table 2-5, page 2-8), 4,320 acres (page 4-54), 11,055 acres (page 4-125, page 4-127) and the importance of this component of the ecosystem warrant total exclusion of grazing. Seasonal limitations, partial BNM reductions, or forage utilization limits on grazing are not sufficient for restoration or continued existence of quality riparian areas.

119 We support designation of the Escalante Canyon ACEC, the Fairview BMA, and the Headed Rock ACEC/OMA, but management plans for these areas are not specified in sufficient detail. Management Unit D-11, the Escalante Canyon ACEC, should be enlarged to encompass additional lands along Escalante Creek. This area requires restrictions on livestock grazing to prevent damage to the federally listed end and other unique botanical resources. Other management provisions should be listed in specific detail for each site.

136 In addition to our support of recommendation of the Gunnison Gorge WSA, we also ask that Adobe bedlands and Camel Back be recommended as suitable for wilderness designation. We find absolutely no justification in the draft RMP for exclusion of the latter two areas. The RMP clearly states that their exclusion "...would prevent the permanent protection of existing wilderness values, including pristine environments and outstanding opportunities for primitive and unconfined recreation" (page 4-50). Why, then, are these "threatened wilderness values" not to be recommended for wilderness preservation? Please reconsider, and include both Adobe bedlands and Camel Back as recommended for wilderness status.

135 We also ask that the statement of intent to require resources to protect threatened and endangered species in land use activity plans (page 3-3) be amplified to specify that this intent also includes BLM-sensitive and state-sensitive plant species and plant associations.



Mr. Vecchia
-page 3-

Finally, we strenuously oppose disposal of any public lands on which federally listed or candidate plant species occur (page 4-52). The final RMP should state unequivocally that a thorough survey for such plants will be made on any parcel proposed for disposal, and that no disposal of land containing listed or candidate plants will occur. It is vital that these sites remain public property.

Thank you for the opportunity to review and comment on the Draft RMP. We would be glad to cooperate in any reasonable way to perpetuate the unique botanical values of the Uncompangre Resource Area, which we consider a very special part of Colorado.

Sincerely yours,

Susan S. Martin

Susan S. Martin
Conservation Committee Chair

November 4, 1987

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompangre Basin Resource Area
2808 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia,

The National Parks and Conservation Association appreciates the opportunity to submit comments on the Uncompangre Basin Resource Management Plan. NPCA is a national, nonprofit organization devoted to the protection of national parks and related resources with about 55,000 members nationwide.

Wilderness

We support BLM's recommendation to recommend all 21,039 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Without question, the Gunnison Gorge is one of the premier candidate wilderness areas in the state of Colorado. We commend BLM for its all wilderness recommendation for the Gunnison Gorge.

We recommend that BLM recommend the Adobe Badlands for wilderness. Your documents provide no compelling rationale why this area should not be recommended for wilderness designation. Resource conflicts appear to be minimal, especially since BLM states in the plan that it intends to prohibit off-road vehicle use in the area. Designation of the Adobe Badlands would add to the area's protected wilderness and recreational opportunities. We encourage BLM to reevaluate its recommendation for the Adobe Badlands WSA.

We also encourage the BLM to recommend Camel Back WSA for wilderness designation. Camel Back is one of a limited number of undisturbed areas still existing on the Uncompangre Plateau. From our review of BLM documents, we perceive no resource conflicts with wilderness designation of this area. Rather, the area's scenic, recreational and wildlife values make it a deserving area for wilderness designation. We urge BLM to reconsider its no-wilderness recommendation for Camel Back.

National Parks and Conservation Association
1015 Thirty-Six Street, N.W., Washington, D.C. 20007
Telephone (202) 944-8530

Areas of Critical Concern

The Federal Land Policy and Management Act (FLPMA) requires BLM to "give priority to the designation of Areas of Critical Environmental Concern." FLPMA defines ACECs as "areas within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes."

BLM fails to comply with FLPMA's requirements regarding ACECs in the Uncompangre Resource Management Plan. While the Conservation Alternative and Preferred Alternative recommend designation one relatively small ACEC, the Plan fails to provide any analysis of other potential ACEC candidate areas. This failure leaves NPCA with the impression that BLM didn't complete such an analysis. This is particularly true because other areas exist in the Resource Area which include "important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes." Some examples include all or portions of the three WSAs and all or portions of the Gunnison Gorge Recreation Area. The BLM should include a more complete analysis of ACEC candidate areas in the Final Plan.

Oil and Gas

The BLM fails to provide adequate analysis of oil and gas issues in the draft RMP. In *Congress v. Buford* the court said, "comprehensive analysis of cumulative impacts of several oil and gas activities must be done before a single activity can proceed." A cumulative effects analysis is not provided.

We do support BLM's no leasing recommendation for the Gunnison Gorge, but recommend that it be expanded to include the entire Gunnison Gorge Recreation Area.

Disposal of Lands

BLM identifies several areas for disposal with high recreational values and use, including the Muddy Creek tracts above the Poudre Reservoir, lands on Baldy Peak and the West Dallas Creek tract. We encourage the BLM to revise its criteria for identification of disposal lands to rule out high recreation value or use areas. Similarly, lands with wilderness values, historic values, cultural resources or values, wildlife resources or values should not be identified for disposal.

Red Canyon

We encourage the BLM to identify the acquisition of land in Red Canyon to provide for a more logical and ecologically sound boundary for the proposed Gunnison Gorge.

ORV Use

In order to adequately protect public land resources and meet its stewardship responsibility, BLM should limit vehicles to existing roads, except in limited "closed" and "open" areas. Areas open to off-road vehicle travel are clearly sacrifice areas. Vegetation, soils, wildlife habitat, and scenic values and unavoidably harmed. In fact the Plan admits that ORV use will have substantial adverse impact on soils, water, and vegetation. We encourage BLM to revise its ORV recommendations in the final RMP.

We appreciate your attention to our concerns. Please keep us informed of progress on the Plan.

Sincerely,

Terri Martin
Terri Martin
Rocky Mountain Regional Representative
National Parks and Conservation Association
PO Box 1563, Salt Lake City, Utah 84110
801-532-4786



Box 168 • Ouray, Colorado 81427 • (303) 325-4640

Bureau of Land Management
Unosopaghe Resource Area
Attn: Jon Seaking and Staff

Dear Jon,

After reading the first draft of the Resource Area Management Plan concerning the Gommion Gorge, there are several points I feel should be remembered.

We offer a safe "resource aware" service to our customers as do other outfitters on the gorge. I feel very strongly about protecting the gorge and have written numerous letters endorsing "Wilderness and Wild And Scenic Designation". Below are the points that need to be re-examined:

1. In your Unosopaghe Basin Resource Management Plan and Environmental Impact Statement "Preferred Alternative" draft one, the BLM recommends that the Gommion Gorge be designated "Wilderness Area". I support this recommendation 100%, but I want Camel Back Mtn and Adobe Sandstone Mtn included in the BLM recommendation to be designated "Wilderness Area". These two areas are ecologically unique and delicate to this area. Please make an environmentally progressive and wise decision for other federal agencies to follow. Recommend that Camel Back and Adobe Sandstone are suitable for "Wilderness Designation".

2. I support, through whatever channels are necessary, for BLM staff in the field to have more power of enforcement, in order for private and commercial users to better adhere to BLM regulations.

3. I feel the BLM is making a respectable mistake by not automatically making fire-pans and porta-potty systems mandatory for all overnight hikers and river trips.

During the '87 season I noticed a marked increase in human waste in camping areas and numerous ground fire-rings. I would use firepans and porta-potties whether they were mandatory or not, but unfortunately that isn't the prevailing attitude among some private users. Make firepans and porta-potties mandatory!

4. Private and commercial launches should be split 50-50. That is private launches and commercial launches. Private boaters have every right to float a section on their own, provided they do so in a "low impact" method.

Commercial boaters equally have the right to launch availability. Commercial outfitters, provided they operate "resource aware and responsible" trips provide a viable safe and low impact service. For customers who want and have a right to experience the Gorge Area on a private/primitive level, outfitters provide the means. These outfitters provide a needed boost to many Western Colorado communities by bringing such needed tourist dollars to west slope areas.

5. Include the season of '87 in consideration of this final draft towards your allocation plan for the Gommion Gorge season of 1988. As I wrote to you in a previous letter concerning just this matter, '87 was our first season as the true corporation.

Putting People and Rivers Together

25



Box 168 • Ouray, Colorado 81427 • (303) 325-4640

of Per Flung Adventures. We made a substantial investment in operating a business on the Gommion Gorge, above and beyond Bureau Of Land Management's regulations and stipulations for commercial outfitters. I'm speaking for other outfitters as well in this matter.

6. Trying to regulate use on the Gommion Gorge by lengthening the hike from a parking area to the put-in on the river by a mile, or closing the trail to horse-riding is only "treating the symptom". A permit system for boaters is a viable method to regulate over-use on the gorge.

We are anxious to work together with you on a management plan that can strike a balance between commercial/private use and maintain the integrity of this marvelous section of river.

Yours for the river,

Steve Colquhoun
Trudy Siskill

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Date:

Robert B. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Unosopaghe Basin Wilderness Technical Supplement:

1. (Do) (do not) agree with the BLM's proposed action, the All Wilderness Alternative, for the Gommion Gorge Wilderness Study Area.

2. The Camel Back and Adobe Sandstone Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be attained through the Allotment Management Plans.

Signed:

Shawn Mack
Richardson & Richardson
Monte, CO 81424

27

Date: 10-15-87

Robert B. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Unosopaghe Basin Resource Management Plan and Environmental Impact Statement:

1. The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed:

Shawn Mack
Richardson & Richardson
Monte, CO 81424

75

COLORADO WESTMORELAND INC.

P.O. Box 1289 Aurora, Colorado 81428 U 303-627-4135

Date: November 2, 1987

Robert E. Vecchia
200 Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Wongmagne Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objectives, while the fewest detriments to livestock grazing, is the "Continuation of Object Management."

86

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

The cattle producers we know that are conducting his fall seasonal feed yards and that if we are to continue raising - beef that we must be sure to work with the BLM and Forest Service to keep up the numbers of cattle and be able to periodically graze our available lands.

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Any disturbance will affect the same categories which cannot be made here and out there areas, but like there and enjoy a day or a weekend during these. The people and some of the best hunting, the recreation and we believe would like to keep these areas as they are! It would like to see these areas and to be able to graze in a controlled manner.

*Thomas A. Campbell
on Campbell's cattle Co.*

November 2, 1987

Mr. Robert E. Vecchia, BLM Team Leader
Bureau of Land Management
Wongmagne Basin Resource Area
2505 South Townsend Avenue
Montrose, CO 81401

COMMENTS ON DRAFT WONGMAGNE BASIN RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Vecchia:

Colorado Westmoreland Inc. (CWI) supports the continuation of the 26 existing allot leases as proposed in each of the four alternatives presented in the Bureau of Land Management's Draft Wongmagne Basin Resource Management Plan & Environmental Impact Statement. As CWI currently holds four federal allot leases, continuation of these existing leases is critical to CWI's ongoing operation.

Though local coal industries are presently suffering in depressed markets, in the long-term, coal markets are projected to improve. CWI also supports the identification of additional acreages of federal coal estate within the Wongmagne Basin for future coal leasing as proposed in the "Production Alternative" and "Wildland Alternative".

CWI appreciates this opportunity to comment on the Draft Wongmagne Basin Resource Management Plan & Environmental Impact Statement. Please feel free to contact me should you have any questions.

Sincerely,
COLORADO WESTMORELAND INC.

Kathleen S. Witt
Kathleen S. Witt
Environmental Specialist

KSW/rtc



MUSSER RANCHES

Box 650 Estesdale
Dillon, Colorado 81416
Telephone: (303) 874-1737
October 30, 1987

Robert L. Heinisch, III Team Leader
Bureau of Land Management
Wongmagne Basin Resource Area
2505 South Townsend Avenue,
Montrose, CO 81401

Dear Mr. Heinisch:

The Draft Wongmagne Basin Resource Management Plan/Environmental Impact Statement contains many hours of research and manipulation of materials. It is very apparent that this study has been prepared by persons or groups who are not really familiar with the area that has been the subject of the study. The study is a good one in that it identifies the area and the people who are not familiar with the area. However, the study is not a good one in that it does not provide a clear picture of the area. In fact, they were instrumental in helping out by the BLM. The area with which we are best acquainted has improved a hundred fold since the BLM was implemented, and we feel it would be an injustice to change any of the present management techniques that are showing great improvements, not only in grazing conditions, but riparian habitat, wildlife habitat, and recreation.

The following are some of our comments on the Wongmagne Basin Draft EIS/EIS.

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ENVIRONMENTAL IMPACT STATEMENT page 4-7 Impact from Livestock Grazing Management - 1st sentence: "...riparian habitat would be maintained at least the same conditions or would deteriorate over the long-term due to trampling and excessive livestock utilization of riparian vegetation." In area 10 there is evidence to grow this statement. Under present management, stream banks as well as all areas not adjacent to streams have improved considerably. Livestock grazing conditions are improving, wild life habitat is improving, riparian habitat is improving and I would recommend continuation of the present management plan with cooperation between BLM, ranchers, and the BLM working together to further improve conditions.

ENVIRONMENTAL IMPACT STATEMENT page 4-7 Wongmagne Basin Resource Management Plan - 1st sentence: "...riparian habitat would be maintained at least the same conditions or would deteriorate over the long-term due to trampling and excessive livestock utilization of riparian vegetation." In area 10 there is evidence to grow this statement. Under present management, stream banks as well as all areas not adjacent to streams have improved considerably. Livestock grazing conditions are improving, wild life habitat is improving, riparian habitat is improving and I would recommend continuation of the present management plan with cooperation between BLM, ranchers, and the BLM working together to further improve conditions.

Through Helado Resource Management, it has been proven that livestock grazing improves riparian habitat. Helado has been proven that livestock grazing improves riparian habitat. Helado has been proven that livestock grazing improves riparian habitat. Helado has been proven that livestock grazing improves riparian habitat.

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...this... limited to 25 percent utilization by weight of any given species" This phrase appears frequently throughout the EIS/EIS. How can 25 percent be determined when adequate records, or no records, are not kept to show what one hundred percent is. How can this be done? How can 25 percent of the vegetation that was in the area fifty years ago, five years ago, or before the start of the grazing season? Who is going to know what 100 percent was, to implement any of the ideas set forth in the EIS. Huge amounts of money will have to be allocated for monitoring and pricing. These ideas certainly are not in keeping with reduction of government spending.

133

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Under present management, riparian, including many species of native grasses and forams, has been improved considerably. It is very evident, since the riparian habitat has been improved in this area, they have either sold their own or possibly have evolved under present conditions.

At the same time, it is very evident that OUE users will have to be controlled as there are several areas that have been denuded by OUE use and human tramping.

In order for the ranches in the area to be efficient, livestock need to have at least a strip through this RMA. If ranches are not efficient, they will be sold for use other than ranching. This will cut down on forage available to the wildlife as the increased use of the area for recreation will cause further deterioration of the environment. In this canyon, wildlife is very much dependent on the irrigated ranches not only for food, but for the privacy that is necessary to sustain wildlife.

The management of each allotment should be considered on an individual basis. For example, the riparian habitat (D-3) referred alternative) does not have the same qualities or problems at elevations above 7000 feet in some of the areas that occur below 5000 feet elevation in other areas.

If ranchers are forced to curtail their grazing use on the RMA, many of them will be forced out of their livestock operations. While this is exactly what many of the well-to-do environmentalists are pushing for, if the livestock operators are forced out of business, there will be deterioration in the ranges even for wildlife because livestock is an important and compatible part of the ecosystem. Contrary to popular opinion, 80% of the wildlife in the United States, outside of Alaska is very dependent upon private land. Our public lands lack a vital supply of food, water, and the privacy needed for a desired wildlife population.

For continued improvement of range quality, we strongly urge the COMMISSION OF THE PUBLIC RESOURCES MANAGEMENT PLAN with emphasis on cooperation and understanding between the agencies involved--whether the areas of concern are conservation, quality, grazing, wildlife habitat, or mining sites. Thank you for the opportunity to reply to the Draft ROP/MS.

Sincerely,

John A. Walker
Rancher/Banaroo

**Colorado-Ute
Electric Association, Inc.**

P. O. Box 1140
Montrose, Colorado 81401
(303) 288-4931

November 4, 1987

Robert E. Vecchia
RMP Team Leader
United States Department of the Interior
Bureau of Land Management
Uncompaghe Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

Draft Uncompaghe Basin Resource Management Plan

Colorado-Ute Electric Association, Inc. is an electric generation and transmission cooperative headquartered in Montrose, Colorado. It operates on a non-profit basis and provides wholesale electric service on an "all-requirements" basis to 14 retail electric distribution cooperative members who serve 191,000 customers in parts of all of the state's 63 counties. Colorado-Ute owns electrical facilities, land and water rights in and near the RMA managed lands covered by the current draft Resource Management Plan. Colorado-Ute submits the following comments concerning the Draft Uncompaghe Basin Resource Management Plan and Environmental Impact Statement.

Gunnison Gorge Wilderness Study Area (WSA)

The impact to Colorado-Ute of wilderness designation for the Gunnison Gorge WSA would not be negligible as has been stated on page 4-12 of the Wilderness Technical Supplement (WTS). The conditional water decrees (72,000 acre feet of conditional water rights) that Colorado-Ute owns on the Gunnison River are very valuable property rights. These decrees are senior to the entire Current Project, including Blue Mesa Reservoir and are valued up to \$7 million. If the Gunnison Gorge WSA is designated wilderness, the full potential value of Colorado-Ute's water rights could not be realized. The Tri-County Reservoir right is decreed for three separate locations. The value of the original location, just downstream of the confluences with the North Fork, would be virtually eliminated. Two newer decreed locations further downstream would be restricted so that the full amount of decreed storage could not be realized.

Mr. Vecchia -2- November 4, 1987

The WTS also incorrectly describe the benefits and alternatives to Colorado-Ute's project. A reservoir constructed on the Gunnison River would provide Colorado-Ute benefits in addition to more generating capacity, which cannot be replaced by constructing coal-fired generation, as suggested on page 4-12 of the WTS. The operational flexibility of hydroelectric generation offers power system peaking and regulation benefits that cannot be obtained from coal-fired generation. In addition, a reservoir would provide a water supply for a downstream coal-fired generating station.

It has been the consensus of the advisory committee studying the possible designation of a Black Canyon National Park and Scenic Recreation Area that the loss of that use of the water rights owned by Colorado-Ute and the City of Delta, and Colorado-Ute's associated hydroelectric project, should be mitigated. The final Uncompaghe Basin RMP and EIS should address how Colorado-Ute and others with development rights to be impacted, will be compensated for the water right development potential that would be lost as a result of wilderness designation.

Colorado-Ute also has concerns resulting from the effect the Gunnison Gorge being designated as a wilderness area has on area economic development opportunities. One clarification is that once it is designated wilderness, there are those who would strive to have the area classified as a Class I area under the Federal Clean Air Act. Such designation would severely restrict economic development opportunities for communities in the North Fork and Uncompaghe Valley. This would be an unfortunate spin-off from a wilderness designation, where, if the area were not designated wilderness, it could be easier to conduct its scenic and other valued resources, and economic development opportunities would not be lost to communities in the surrounding area.

Management Unit D-7

Colorado-Ute disagrees with the proposed management of major utilities in management unit D-7. A large geographic area (50,854 acres) is proposed to be closed to utility development to reduce conflicts between utilities and potential surface effects of coal mine subsidence. Colorado-Ute believes this action is unnecessary since the existing mines in the area are room and pillar operations which typically cause little surface subsidence. If a transmission line were needed in this management unit, any potential subsidence problems could be addressed in the BLM permitting

Mr. Vecchia -3- November 4, 1987

We are also concerned about the potential public opposition, due to visual concerns, in routing a line in the proposed 0.5 mile wide corridor centered on Colorado Highway 133. The RMP should be flexible enough to allow consideration of other potential corridors during scoping and permitting of any future lines in that area.

General Comments

The analysis of the impacts of major utility development in the RMP appears to have been heavily influenced by the 1980 Western Regional Corridor Study. This study is over seven years old and is only a planning tool. Projects requiring electric service either on a local or regional level can develop or change rapidly. We do not agree with your assumption on page 4-58 "Closure or restrictions on lands not identified as being needed (in 1980 Western Regional Corridor Study) for utility facilities would be assumed to have a negligible impact on local and regional major utility development". The need for and predictability of utility development is much more dynamic than has been portrayed.

Colorado-Ute does not believe it is necessary or appropriate to prohibit siting transmission lines in riparian zones (see p. 4-51). In many of the narrow canyons in the area it would be possible to span the riparian zone or just trim the vegetation that would interfere with conductor clearance.

Colorado-Ute does not believe utilities and their associated access are currently stressing or would stress wildlife in the North Fork area (see p. 4-53 Impacts on Terrestrial Wildlife Habitat). The benefits of confining utility facilities to existing corridors along major roads have been overstated. If necessary, gates or barriers can be used to restrict access to protect wildlife, and can be addressed as BLM permit conditions, when appropriate.

Thank you for this opportunity to comment on the Draft Uncompaghe Basin Resource Management Plan. Please contact me if you have questions concerning these comments.

Very truly yours,

John A. Walker
John A. Walker, Manager
Environmental Services

JAW/HMR:gr



Chevron USA Inc.
8003 South Foothills Drive Circle, Englewood, CO 80111, P.O. Box 999, Denver, CO 80201

Lisa Pasche Mosler
Staff Advisor
Legislation and Regulatory Affairs

November 5, 1987

Draft EIS and Resource Management Plan
Uncompahgre Basin Resource Area

Mr. Robert Vecchia, RMP Team Leader
Uncompahgre Basin Resource Area
Bureau of Land Management
2305 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Pursuant to my phone conversation with you last week, please accept my comments on your draft EIS and RMP, even though you will have received them after November 5. As you recall, I had phoned your office for test days and was not able to get through due to your phone number having been changed. On October 26, I finally wrote you a letter requesting a copy of the draft. In a subsequent phone conversation, you said that you would accept my comments as long as they were postmarked by November 5.

Chevron commends your RMP team for preparing such a clean, understandable document. We believe that your decisions are justified and presented in a logical concise manner.

We also support your preferred alternative. Under that alternative, your use of oil and gas stipulations seem reasonable, equitable, and unbiased.

However, Chevron does have one suggestion that we believe would make your document more defensible. Possibly the appropriate place would be in Chapter 3, "Consultation and Coordination." We believe that it is important that the public be informed with a general description of the process involved when oil and gas activities are conducted on public lands. Specifically, it seems that it would be important to emphasize that the public will have future opportunities to comment on proposed oil and gas activities, and to give them a general idea of the procedures and regulations that industry and the BLM must comply with before we can lease or engage in exploratory or production activities.

Thank you for your consideration of these comments.

Sincerely,

Lisa Pasche Mosler

LFM:js

Northern Region - Exploration, Land and Production

JERRY D. JACKA

P.O. BOX 964 - PINEHOLE RESERVOIR ROAD - TELEPHONE 803 362 2000
August 7, 1987

John Davis
U.S. DEPARTMENT OF INTERIOR
Bureau of Land Management
Montrose District Office
2485 South Townsend
Montrose, CO 81401

Dear Mr. Davis:

Thank you for sending copies of the June 87 drafts of the Uncompahgre Basin Resource Management plan.

I am interested in purchasing certain parcels of land should they become available. The parcel of most interest is that described by Ouray County as Parcel #25, Map #517. This is an 80 acre parcel in the east half of the southeast quarter of Section 14. However, I am interested in any property in the general area that may become available. I have attached a copy of your Preferred Alternative Map and have highlighted in yellow the parcels of interest.

I am interested in cash purchase or have can acres in Yankee Boy Basin and forty acres north of Silverton, both in National Forests, which are available to trade.

I would appreciate it very much if you would advise me as soon as possible if any of the property becomes available for public acquisition.

Sincerely,

Jerry D. Jacka

The attachment is available for review at the BLM office.

P.O. Box 729,
Boulder, CO 80506
9/17/87

Dear Mr. Vecchia-

I have spent time hiking and kayaking in the Gunnison Gorge and strongly urge that it be designated a wilderness area. I also support, strongly, the elimination of grazing and the introduction of bighorn sheep in the ballroom areas. I would like to see all ORV use stopped.

Sincerely,
Kate Palmer

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DR. AND MRS. FRANK DENNEHY

10404 E. W. RD.
GRAND JUNCTION, CO. 81504
(303) 424-4719

Dear Mr. Vecchia,

September 14, 1987

My wife and I are residents of Grand Junction. We frequently enjoy Western Colorado's outdoor offerings. And, being former Easterners, we are watching very closely the development of western Colorado. We have seen the tragic results of overdevelopment. I am writing to you regarding the Uncompahgre Basin Resource Management Plan. I would like to ask you to do what you can to change the Plan as it is proposed concerning the Camel Back area. I highly value the Uncompahgre Plateau as one of the last "undiscovered" beauty spots of the Western slope. The fact that none of it is designated wilderness is pitiful. Please reconsider Camel Back as a designated wilderness area. The game heads on the Plateau need it; Western Colorado needs it; I need it. Another area in the RMP I wish to comment on is the Gunnison Gorge Wilderness Study Area. I wish to thank BLM for designating these 21,000 acres as Wilderness. These are prime wilderness areas, and are necessary for the Gunnison River area to continue as one of

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Western Colorado's major fishing attractions. Again - thanks - it was a wise decision.

68 [Lastly, what about the Adobe Badlands? Why not make it a wilderness area? What is the reasoning behind the decision not to make it wilderness. Of what other use is that land? If BLM is going to recommend an area for non-wilderness designation, an explanation must be presented in the recommendation. Colorado has little to gain, and everything to lose, in developing its as-yet undeveloped lands. Try to enjoy a scenic vista in New Jersey. Try to go camping in Virginia (make a reservation well in advance, and be ready for the crowds). Try to find a patch of grass in New Hampshire that doesn't have a no-trespassing sign, or a store selling maple syrup, on it. The western states still have vast areas of relatively unruined land. Let's work to keep it that way.

Thank you for your time.

Sincerely,
Chuck Shepard

Dear Gene,

I wish to go on record as supporting wilderness status for all areas under study by the BLM. I commend the BLM for recommending Gunnison Gorge for wilderness status. I am happy about that.

I fail to understand why we do not preserve as much as we can of the remaining wild parts of our public lands so wilderness as we can. I feel that for too much of our public lands have been developed or in one way or another trashed or runched up. Now is a time we should reevaluate. To do otherwise is short sighted as I am confident that we will grow to need & appreciate the unspoiled wild parts of our country more in years to come. We can not create wilderness and even if we could the cost would no doubt be much higher than it would be to preserve what we now have.

One can also argue that if we now have a great need to use the natural resources in wilderness study areas, we will need it even more in the future. If we must use it, better to save it for later when the need may be much greater.

We seem all too anxious to make use of resources which are already a glut on the market or in oversupply. In fact it provides a few to profit at the expense of the country as a whole. In BLM

should take a position of preserving all it can & put it to the use that will benefit the entire country to the maximum rather than for the benefit of a few to make a profit.

We are at least some have grown rich in material things & poor in spiritual health. We need that wilderness to get away & restore our spirits. We have far too little of it now. There will be a need for it as wilderness even more if our population continues to expand.

68 136 [I would like to have Camel Back and Adobe Badlands also recommended for wilderness status. Their value for wilderness seems to far outweigh their value for any other use. It seems like such a low price to pay for something which we may consider of great value in the future. There are other choices between development & wilderness which may not be so easy. I would hope that the BLM would shift to the side of preserving the wild in any case where there may be any doubt. I see no reason why we should give up our wilderness under no more on overwhelming reason to do otherwise.

69 [We also have a lot of other areas already. Some don't seem to be very prosperous. Before we allow future development we should be certain that such a value exists & we are not just trashing up the land further.

Thanks, Gene,

Chuck Shepard.

P.O. Box 36
Colorado, CO 81413
Sept. 15, 1987

Mr. Gene Weckie
B.L.M.
Montrose, Co.

Dear Sir:

As a Native son-born in Colorado and an ardent conservationist, I want to sincerely express my appreciation for B.L.M.'s recommending the Gunnison Gorge Wilderness Study Area for Wilderness protection.

136 [However, I cannot understand BLM's not recommending any of Southwestern Canyon dubbed "Camel Back" in your study for wilderness protection. The Gunnison Gorge is one of the few remaining areas in Western Colo. accessible to visitors and residents alike.

68 [In so far as the Adobe Badlands are concerned, I see the point whatever in naming that area into a wilderness area. There is a place a foot to establish a Nat'l. Guard training base in that area - a few dollars more for it than declaring it a Wilderness area.

However the Strawberry Ski Area Site is an entirely different situation! Elk and deer in this State are being harried all too much without putting another ski area in our Mtn habitat. I am a hunter and enjoy the sport - but it is a sport that even out of State residents can afford, skiing, on the other hand is strictly a "Rich Man's (and Woman's) sport. \$35.00 charges per day for a lift ticket is a very small part of his or her daily expenses. Housing, air fare and equipment must up into thousands of dollars per person per week! The Mt. Crest Pass Ski Area is flourishing for lack of financing. It seems patently obvious that expansion of the ski "business" into an Elk calving grounds and deer feeding area cannot be justified at Strawberry or any other such area.

yours truly

Robert E. Vecchie

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Sept. 17, 1987

Dear Mr. Vecchie:

I am asking that you support Wilderness in the following: Camel Back - Bouddies Canyon 2 Adobe Bedlends. Please manage Storm King Mtn for the elk & giving a not for development. Also thank you for your help in Gunnison Gorge. It is really up to you to help preserve Colorado & set a high standard of clean air, water, vistas, for our state to continue with tourism. Without these pieces of scenic value - in a high standard we would loose the tourism that is well established. Sincerely,

Ken Hoad
Box 4931
Aspen, Colo 81612

ph: 927-3448

87 Sep. 14

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchie:

Thank you for recommending that the Gunnison Gorge Wilderness Study Area be given wilderness designation. This magnificent area, and the beautiful section of the Gunnison River that it contains, deserve full protection from development.

However, I am dismayed that BLM has not made the same recommendation for the Camel Back and Adobe Bedlends areas. These two regions both contain endangered species and striking desert that should receive the protection of the wilderness designation, and neither has a large potential for mineral or other extractable resources. Camel Back and Adobe Bedlends thus have just as much reason to be given wilderness protection as has the Gunnison Gorge area.

I urge BLM to recommend Camel Back and Adobe Bedlends for wilderness protection, in order to preserve these valuable regions.

Sincerely,

Robert E. Vecchie
Kurt Johnson
747 12th St.
Boulder, CO 80302

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54959 Hickory Road
Cloche, Colorado 81425
September 18, 1987

To:
Robert E. Vecchie
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

From:
Dick Brown and family, Victor Reed and Rex A. Reed.

Subject: Proposed change in RMP, dated June, 1987.

We have reviewed the June, 1987 Uncompagme Resource Management Plan and would like the Bureau of Land Management to give consideration to the following lands for disposal. The BLM land we are interested in acquiring is not identified for disposal except for one 40 acre parcel. By proposing the following land exchange for review in the UMP comment period, a later planning amendment can be prevented after the plan is completed. (See the attached maps) The value of the lands are approximately \$75.00 to \$100.00 per acre.

Lands offered by the Brown family:

1499, R11 & NW1W
Sec. 19 NE $\frac{1}{2}$ SW $\frac{1}{2}$, S $\frac{1}{2}$ SW $\frac{1}{2}$, NW $\frac{1}{2}$ SE $\frac{1}{2}$ - 160 Acres
Sec. 30 SE $\frac{1}{2}$ SW $\frac{1}{2}$ - 40 Acres
TOTALS - 200 Acres

Lands selected by the Brown family:

1488, R12W NW1W
Sec. 12 N $\frac{1}{2}$ NW $\frac{1}{2}$ - 80 Acres
N $\frac{1}{2}$ SW $\frac{1}{2}$ - 80 Acres
Sec. 14 NW $\frac{1}{2}$ SE $\frac{1}{2}$ - 40 Acres
TOTALS - 200 Acres

Lands offered by Victor and Rex Reed:

1499, R11W NW1W (the same for land selected)
Sec. 28 SW $\frac{1}{2}$ NW $\frac{1}{2}$ - 40 acres
N $\frac{1}{2}$ SW $\frac{1}{2}$ - 80 acres
Sec. 29 NW $\frac{1}{2}$ SE $\frac{1}{2}$ - 40 acres
TOTALS - 160 Acres

40

Lands selected by Victor and Rex Head:
 Sec. 21 1/2 SW - 80 acres
 SW 1/4 - 80 acres
 TOTALS - 160 Acres

The advantages of this proposed land exchange are as follows:

- "The management unit would be managed to improve vegetation conditions and increase availability for livestock grazing." (Chapter 3, Page 31, URMP).
- "If they are available non-federal lands that would improve livestock management and increase crucial deer and elk winter range would be acquired through exchange only." (Chapter 3, Page 32, URMP).
- "Identification of public lands that are suitable for disposal and public lands that should be retained in public ownership; also, identification of non-federal lands that would best serve the public needs if in public ownership." (Summary, Page 1, URMP).
- "The BLM actively acquires legal access as needs and opportunities arise. All forms of access acquisitions are considered including negotiated easements, cooperative right-of-way agreements and exchanges." (Chapter 2, Page 24, URMP).
- Boundaries will contain land in blocks for more efficient management.
- Private inholdings would be acquired.
- Exchange would give legal access to Cushman Pass.
- Mineral rights held on the private lands owned by Brown and Head would be conveyed.

Conclusion: For the above reasons we believe the proposed land exchange would be in the public interest.

Respectfully submitted,

John F. Brown
Victor H. Head

Attachments are available for review at the BLM office.

2

Thursday
 Sept. 17, 1987

Dear Mr Vecchia:

I am writing to make a few comments on recent BLM recommendations.

First, I would like to thank the BLM for recommending that all 21,038 acres of the Cushman Pass Wilderness Area be withdrawn protection. I have visited this area and am so happy to hear of your positive approach on this beautiful area.

I would also like to encourage your department to recommend that Camel Back's entire 10,402 acres be also under wilderness protection as well as the Osler Badlands.

In closing, I would also like to urge the BLM to manage the storm king mountain for elk and not for ski developpms.

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JULIE J. GLENN
 P.O. BOX 7255
 STEPHENSON, CO
 80477

Sept. 18, 1987

Mr. Gene Vecchia
 BLM-RMP Team Leader,

I have worked and guided extensively in the Cinnamon Ridge area of the San Juan Mtns for many years.

The plan to allow a new ski area in the northern section is not a good idea.

In Steamboat we built a ski area on an Elk Colony ground and nearby Elk have no where to go for foraging in the winter except private farms, golf courses, condos and other general chaos by their presence.

The same thing will happen in your area if private colony grounds and more deer foraging area are destroyed to promote a new ski area.

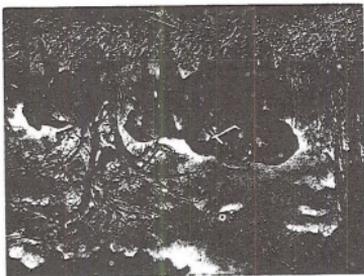
The serious demand is not up to the 10% increase mandated by USFS to let new ski areas build. If you coordinate with the other Forest Service areas in Colorado, there is no need of new proposed areas to meet the "increasing demand" which is not there.

Why let speculation overbuild Colorado Again? These "blowing" Stroganovs and a dozen other new proposed ski areas scattered over our once beautiful mountains?

One to allow a 5-year grace period before deciding whether to allow it. Let's see the conditions during it, is too late. How many other ski areas do you build? Be realistic. Put it off now, there is no demand!

Sincerely, Julie Glenn

69



Please protect our beautiful wilderness and wildlife. They are too beautiful to destroy. Thank you for your time.

 World Wildlife Fund
 5050 Treasury Plaza Bldg, NW
 Washington, DC 20037

The cost was covered solely for us by World Wildlife Fund members and supporters - people who care about wildlife. The money sending this card contributed to WWF's efforts to protect the world's endangered wildlife.

and conservation,
 Michele K. Windaker
 P.O. Box 673
 Wheat Ridge, CO 80034



Gene Vecchia
BLM
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I am writing to ask BLM to be sure to include wilderness protection for the Camel Back area inasmuch as it is one of the most logical areas in the state to be so designated. With no real justification for timber or mineral development, with a beautiful pristine canyon, and encompassing part of the unusual Uncompangre Plateau not already badly scarred, it seems to be one area which should have been selected for wilderness protection without even any controversy.

With the rapid disappearance of so many rare plant species and the fact that our state's wildlife herds are being further and further restricted in their habitat, I consider these additional reasons for your agency to reconsider the designation for Camel Back.

Thank you for recommending Gunnison Gorge. If anything, Camel Back is more worthy of wilderness protection.

Nina Johnson
Nina Johnson
747 12th
Boulder, CO 80302

... and I appreciate the hard job it must be
to represent fairly all interests.

Paul E. Lappaia
486 Mesa Verde
Carbondale, CO 81423

September 17, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

68 [we are writing to you in support of the BLM decision to recommend
136 the Gunnison Gorge for wilderness designation. We do want to go
on record in support for the same recommendation in the case of the
Camel Back (Roubidoux Canyon) and the Adobe Badlands areas.
From what we have read, these areas seem to pose no problem in
addition to wilderness designation, so why not?

69 [In addition, we favor the preservation of the Storm King area for
deer and elk calving grounds rather than a ski area. At least let
the public be heard before permitting the 5-year grace period now
being suggested.

Sincerely yours,

Paul E. Lappaia
Paul E. Lappaia

THE FAMILY
2100 1/2 10th
ST. N.W.
DENVER, CO 80202

Gene Vecchia
RMP Team
BLM
2505 Townsend
Montrose, Co,

Sept 17-87

Sir,

136 [His letter in reference to
BLM recommendations for Wilderness by your office. I
encourage you to re-evaluate your position.

136 [① Camel Back should be wilderness

68 [I cannot understand why an area with no
resource conflicts is not recommended. Why another
done.

68 [② Adobe Badlands - should be wilderness.

69 [Gunnison Gorge should be protected in its entirety
as you have recommended. Storm King Ski Area is
a ridiculous proposal I urge BLM to abandon any
consideration of it.

Sincerely,
Greg McKeen's

1660 B. Abbot
Suite 818
Denver, CO 80202

Claire C. Poole, Psy.D.
Licensed Clinical Psychologist

Telephone:
(303) 742-0252

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

9-18-87

Dear Mr. Vecchia:

62 [Hurry! I am delighted to hear that the
Gunnison Gorge WSA has been recommended for
wilderness protection under the Wild and Scenic Rivers Act.

68 [Let me urge you to reconsider your recommendation
136 for the Camel Back and Adobe Badlands areas. Both areas
have great potential for wilderness and very little potential
for anything else. Once the wilderness qualities of these areas
are compromised by drilling, mining, timbering and the rest
this is no going back. Once lost they are lost forever. There
is next to no wild land left we cannot afford to let
any opportunity for protection slip away. In fact, I
believe the border should be on establishing an
overwhelmingly important non-wilderness use for the land
rather than justifying wilderness status.

69 [The value of unspoiled wilderness to future generations
far outweighs any immediate economic gain. We must
stop thinking only of ourselves. Please do not allow the wilderness
to slip away, and do not allow development to begin on the
Storm King site. Your agency is fully capable of making a
good, balanced decision on this case - don't be pushed into hasty,
provisional approval that can have devastating impact.

Sincerely,
Claire Poole

Sept 16, 1987

Mr. Vecchia,

I am writing the BLM office in reference to Uncompahgre Basin Resource Management plan recently drafted.

I approved the BLM recommendation of some 21,000 acres for the Glenasmion Stage Wetlands Area. This recommendation combined with the Glenasmion N.M. downstream and it would scenic river out projects this area well.

There are two adjoining areas, Camel Back and Adobe Badlands, totaling about 20,000 acres that should also be included in our RMP.

In the Camel Back area there is no resource conflict, timber or mineral sources and the BLM is cutting back grazing as well. The 500-foot canyon cut by Roubidoux Creek through Colorado Major geophysical features, Uncompahgre Plateau, provides a pristine wild experience. There are several endangered plant species and wild game animals that inhabit Camel Back. If the receiving wetlands status I see no reason why not... could you explain your position of non-inclusion designation.

The Adobe Badlands is in need of some attention. This area has some outstanding cactus, dry red soils, low mineral potential, no timber, closed to ORV and considerable views of the San Juan, Ute river wilderness designation?

Sincerely,
John Spagnoli



Dear Mr. Vecchia,

9/18/87

Having just visited your lovely area of Colorado by attending the 12th Annual Gunnison Water Conference,

I urge you to protect Roubidoux canyon + the Adobe badlands for our children to visit with their children. Your thinking on the 5-year grace period for the storm king. The area stands like a first of its kind. Is this management? In Routt Co we are fastly seeing dollars roll in from long term natural preservation + will continue to seek recognition for conservation. Please record my comments, I'm unable to travel to Montrose 9/29/87.

Sincerely,
Charles Altman
member NW Rivers Alliance

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17 Sept '87
8110 Buck Cr. Rd
Krasville, Tn 37720

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Robert E Vecchia, RMP Team Leader
BLM, Uncompahgre Basin RA,
2505 S Townsend
Montrose, CO 81401

Dear Mr. Vecchia,

Please include this letter as part of the record on the Uncompahgre Basin RMP/EIS. In general I was impressed with the quality of your planning effort, although some of the statistics were maddeningly imprecise. For example, the remark that a specific action would result in a loss of 1% decrease in habitat in the Colorado River system (Gorgehead) is almost worthless. A 1% decrease in the entire river's load would be a major victory. On the other hand, less than 1% could mean anything. Also on p. 4-10 of the WTS is the prediction that at a 50 to 500% decrease in sediment yields. Come on. A 500% decrease? Does that mean that stopping ORV use will actually extract sediment (produce up to minus 400%?) from the river?

In general I support the Conservation alternative and urge you to incorporate it. In particular the Gunnison Gorge should be protected at all costs. The ducks, peregrines (I saw one in the Gorge near the Ute trail crossing in about 1973), deer, elk, bighorns, and solitude seekers need a protected river. Serious consideration to protect the Camel Back WSA is also warranted. Whether range like that won't be around a generation hence if you don't protect it.

Sincerely,
Richard Riebel

Mr. Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

I have reviewed the BLM's Draft Uncompahgre Basin Resource Management Plan/Environmental Impact Statement (RMP/EIS) and have the following comments.

I have compared the existing management plan alternative of lands available to off road vehicle (ORV) use and the BLM's Preferred Alternative acreages of lands available for ORV. The Draft RMP/EIS says there are currently some 144,521 acres available for ORV use and only 21,038 acres closed to that use. In BLM's Preferred Alternative there would be only 261,389 acres open to ORV use, 29,811 closed and 135,396 acres subject to seasonal closures to ORV use. As a winter and summer user of public lands, this amounts to a significant reduction in public lands open to public use. Consequently, I am strongly opposed to a BLM plan and preferred alternative which further limits, controls and/or prevents the use of "public lands" for continued use by the "public."

Consequently, I feel it is extremely important to prepare a detailed map and listing of roads and/or areas which would be closed or partially closed to use by ORV's for review by the general public land users. I am sure these folks will have some additional thoughts and comments on this issue.

I appreciate the chance to comment on this Draft Plan.

An Interested Citizen,
Larry Abbott
Larry Abbott

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Mr. Gene Vecchia
RHP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Subject: Uncompangre Basin Resource Management Plan

Dear Mr. Vecchia:

Dear Sir,

I'm writing to you about your three desert wilderness recommendations. As I understand you've dropped The Camelback and Adobe Badlands. I sincerely hope that you would reconsider since these areas have unique geological and biological values.

Every day the value of preserving these areas becomes more apparent. So please reconsider, future generations will thank you.

Sincerely yours,
W. Rodney McKinnon
7840A County #1
Montrose, Colorado
81401

Thus I am greatly disappointed about BLM's non-wilderness recommendations for Camel Back and Adobe Badlands. No resource conflicts exist with the Camel Back canyons. You know this. There are no timber or mineral conflicts, and planned cutbacks in grazing will protect the riparian of the perennial Roubidau Creek. I have hiked this creek, and attest to the great beauty and solitude of Camel Back. I have visited Adobe Badlands. Much of it is reminiscent of Petrified Forest National Monument in northern Arizona. It shows a low potential for minerals, and is devoid of timber. These places are wild, Mr. Vecchia, and I want BLM to reconsider. Please recommend the 10,402 acres of Camel Back and the 10,425 acres of Adobe Badlands as wilderness.

I am just as disappointed in BLM's management position on Storm King Mountain. Why is it that, when there is a conflict between human economic expansion and large numbers of wild animals, the wild animals must go? I do not want a ski area anywhere near Storm King Mountain, and I object to BLM's five-year grace period in which the developers may proceed with the ski area. I want BLM to manage Storm King Mountain for elk, And mule deer, And high mountains. And green forests.

Thank you, once again, for the Gunnison Gorge

W. Rodney McKinnon
Storm King Mountain

Box 251112, Lakewood, CO 80026-1112

Mr. Gene Vecchia
RHP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

20 Sep 87

53

Subject: Uncompangre Basin Resource Management Plan

Dear Mr. Vecchia:

I am completely supportive of your decision to recommend all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Several important reasons exist in support of Gunnison Gorge wilderness. The area buffers Gunnison National Monument. It contains 13 miles of a river which is now a gold medal trout fishery and someday will be a National Wild and Scenic River. The undeveloped, roadless lands of the Gunnison Gorge are themselves of great intrinsic value, more important than any other resources combined. It is vital that every last acre of Colorado wilderness be preserved.

Thus I am greatly disappointed about BLM's non-wilderness recommendations for Camel Back and Adobe Badlands. No resource conflicts exist with the Camel Back canyons. You know this. There are no timber or mineral conflicts, and planned cutbacks in grazing will protect the riparian of the perennial Roubidau Creek. I have hiked this creek, and I attest to the great beauty and solitude of Camel Back. I have visited Adobe Badlands. Much of it is reminiscent of Petrified Forest National Monument in northern Arizona. It shows a low potential for minerals, and is devoid of timber. These places are wild, Mr. Vecchia, and I want BLM to reconsider. Please recommend the 10,402 acres of Camel Back and the 10,425 acres of Adobe Badlands as wilderness.

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Thank you, once again, for the Gunnison Gorge

W. Rodney McKinnon
John Carmack
820 Brentwood, Lakewood, CO 80215

Mr. Gene Vecchia
RHP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

20 Sep 87

54

Subject: Uncompangre Basin Resource Management Plan

Dear Mr. Vecchia:

I am completely supportive of your decision to recommend all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. Several important reasons exist in support of Gunnison Gorge wilderness. The area buffers Gunnison National Monument. It contains 13 miles of a river which is now a gold medal trout fishery and someday will be a National Wild and Scenic River. The undeveloped, roadless lands of the Gunnison Gorge are themselves of great intrinsic value, more important than any other resources combined. It is vital that every last acre of Colorado wilderness be preserved.

Thus I am greatly disappointed about BLM's non-wilderness recommendations for Camel Back and Adobe Badlands. No resource conflicts exist with the Camel Back canyons. You know this. There are no timber or mineral conflicts, and planned cutbacks in grazing will protect the riparian of the perennial Roubidau Creek. I have hiked this creek, and I attest to the great beauty and solitude of Camel Back. I have visited Adobe Badlands. Much of it is reminiscent of Petrified Forest National Monument in northern Arizona. It shows a low potential for minerals, and is devoid of timber. These places are wild, Mr. Vecchia, and I want BLM to reconsider. Please recommend the 10,402 acres of Camel Back and the 10,425 acres of Adobe Badlands as wilderness.

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Thank you, once again, for the Gunnison Gorge.

Richard Kilburg
Richard Kilburg
3232 San Mateo NE #1 33, Albuquerque, NM 87110

P.O. Box 373
Case-46, CC 80306
9-23-87

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I was pleased to read that you have recommended the Gunnison Gorge area for wilderness designation; the more I see of the eastern slope semi-desert, the more interesting it gets.

But don't let the large-scale terrain like Gunnison Gorge distract you from things of a more human scale, like squishy Canyon. There it is possible to cross the stream and explore all the interesting views and formations, not just wonder what it would be like if you could get there. Given the apparent lack of artifacts with wilderness status, it is disappointing that the smaller jewels not overlooked.

If it is excessively difficult or expensive to fence wilderness, you should set no more to get the funding for more than one area, not just give up and back off. Whether it is or not, my 16-year-old son would probably appreciate having the maximum number of unspoiled areas to visit when he is grown, and this is the last chance you'll have to save them. Men he asks me about really quiet and natural places to go for a vacation from what will probably be even more demanding times than these, I would hate to tell him that we didn't save enough, and they all got over-used, and there wasn't any left.

Sincerely,
William A. Conter
William A. Conter

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Gene Vecchia:

I am writing this letter to comment on the BLM draft Uncompahgre Basin Resource Management Plan. First I would like to thank BLM for recommending all of the Gunnison Gorge Wilderness Study Area for wilderness protection. This parcel of land will be a great addition to the spectacular Black Canyon of the Gunnison National Monument.

Next I would like to encourage the BLM people to recommend the Camel Back (Roubideau Canyon) and also the Adobe Bedlands for wilderness designation. With so few unspoiled areas such as these remaining, and with essentially no conflicts with wilderness designation, it makes sense to protect these prime-undisturbed areas now before they are destroyed. Finally I would like to protest allowing development of the Storm King Ski Area Site. The BLM plan states that the elk calving grounds on the north end of Cimarron Ridge would be eliminated. I cannot understand why the ski developers want to destroy the land which is most critical for the long term survival of what I consider the most prestigious North American large mammal. If you have ever been in the high country and had the opportunity to watch several bull elk compete for a harem of cow elk and listened to the bulls bellow all night long then you gain an appreciation for these animals that can never be lost. Since the ski area developers can't be enticed with choosing a site that will not destroy critical wildlife habitat somebody must do it for them and in this case BLM has the responsibility to prevent the misuse of federal land. I understand that the BLM people are trying to make the best use of all lands and are doing a quite effective job, but in this case the wildlife, as in particular should be given the proper protection. Why is it so difficult to tell the ski developers to find a more suitable area before the ski project gets so much momentum that it can't be stopped?

I thank you for taking the time to read my letter and since the Resource Management Plan is only in its rough draft stages I hope you will give some serious thought to making some additions and changes while they are feasible.

Sincerely,

Jon Tourville
Jon Tourville

September 23, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Sir:

I want to cast my vote against the development of 1,000 acres of BLM lands for a proposed ski area, such land being located on the north end of Cimarron Ridge.

I understand the Bureau of Land Management has stated the ski area would eliminate the elk calving habitat, as well as impact nine deer fawning areas—but in spite of this the Bureau has so far neither approved nor denied it, but instead has proposed a 3-year grace period in which the developers may proceed with the ski area, after which the Bureau might not allow them to develop. I believe this is a ridiculous approach to management—better should they assess the constatability of resources, not give one a 3-year headstart over the other. Please manage Storm King Mountain for elk and not ski area developers.

Yours truly,

Lorraine Lane
Mrs. Lorraine Lane
3505 W. 39th Ave
Denver CO 80211

FERN SUTZ
100 HILLDALE RD.
WALTON, ARIZONA

Saline, Kansas
September 24, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

This letter is in regard to Gunnison Gorge, Camel Back, Adobe Bedlands and Storm King ski area site.

To begin, I would like to thank the Bureau of Land Management for its recommendation of Gunnison Gorge for wilderness protection. Its natural features and its proximity to Gunnison National Monument make it eminently suitable for full protection, and the action should be taken to protect thousands of those who do and will visit this area.

However, I would also protest three other decisions recently made by BLM. I understand that Camel Back and Adobe Bedlands were recommended for wilderness designation. Both of these areas, according to BLM, have no resource conflicts. There is no timber, and drilling has yielded four dry oil and gas wells. Apparently grazing and GNV use are to be cut back or prohibited. But these measures will be only a partial solution. Camel Back is the site of several endangered plant species, as well as big game herds, and Adobe Bedlands is a habitat of an endangered cactus. Both these areas have important wilderness characteristics, including a canyon containing colorful sandstone formations in Camel Back, and vistas of the San Juan Mountains and Uncompahgre River valley in Adobe Bedlands. We need multiple stop-gap measures to protect these wild places.

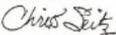
p. 2

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The third action by BLM to which I object is a five-year "grace period" extended to developers of a ski site at Storm King. According to BLM itself, this area is a critically silvicultural ground. In addition, development here would also have an adverse effect on deer farming. By putting off action for five years while developers proceed with their plans is virtually to make a decision now in favor of the developers; it would be many times more difficult to give elk and mule deer, as well as other wilderness values their full due with the developers' interests entrenched by five years' investment and effort. These are public lands, and a decision as to their suitability for wilderness or other uses should be made now, before private uses are allowed to proceed. There must be a better way to assess "compatibility."

Thank you for your time and consideration.

Sincerely,

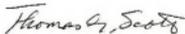


Chris Seits
124 South Hillside
Selins, Kansas 67401

Gene Vecchia-

I have been advised that
BLM has recommended
Cameron's Game of wilderness
protection. It is to be
commanded highly for
taking this position.

I hope you will decide
to take a similar position
on Camel Back (Roubiden
Canyons) and the Aboke
Badlands.

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Dr. Thomas G. Scott
124 South Hillside
Selins, Kansas
67401

9-25-87

September 23, 1987

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Gene Vecchia
RMP Team Leader
Bureau of Land Management
2305 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I am writing concerning three different areas you studied for Wilderness areas and a BLM proposal.

First of all, I would like to thank you for recommending the Cameron Gorge Wilderness area for protection. The importance of this decision cannot be under-rated. This area contains 13 miles of the Gunnison River which has been up for recommendation as a wild river under the Wild & Scenic Act. The BLM has made a very positive decision that I support and hope they will continue to do in the future.

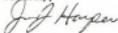
Secondly, the Camel Back area, which I believe should be recommended as a wilderness designation. There are not timber or mineral conflicts over this 10,402 acres of land. It also contains about 7 miles of perennial Roubiden Creek where it cuts through a 800 foot deep canyon of beautiful sandstone formations of the Uncompagme Plateau. More important several endangered species of plants and big birds who live in the area which would greatly benefit from a wilderness designation. I cannot understand why the BLM decided No on this proposal; please explain why they have made this decision. Our state is experiencing many problems with protection of our natural lands and animals, we have a great opportunity to insure the Colorado we know and keep the unique attractions that people from all over come to see.

The third area is the Aboke Badlands which contains 10,425 acres of the Mancos Shale Badlands. They have tested for oil and gas and found no real potential, and obviously there are no timber for cutting. Wherever we areas that provides sweeping views of the San Juan Mountains and the Uncompagme River Valley. It also contains the endangered Uinta Basin hawksucker which in itself is a real treasure. Again, this is an area which there is not alot of conflict over a wilderness designation. I am very confused by the BLM decision not to recommend this area, and I would greatly appreciate an explanation.

The last issue is about the Storm King ski area proposal. This area is 1,000 acres of BLM land on the north end of Cimarron Ridge. Now the BLM has stated that this ski area would eliminate the Elk grazing habitat and have an impact on the Mule Deer fawning grounds. Their solution to the problem is to grant a 5 year grace period to the developers to go ahead and problem is to grant the ski area and then let them know if they will approve the ski area after they have spent 5 years developing the 1,000 acres of land. The BLM is suppose to assess the compatibility of resources, not to give developers a five year head start. Our Elk and Deer areas have been greatly reduced in just a few years, alot more than most people realize. The BLM needs to take another look at their decision, and the role of the BLM in land management decisions. The Elk and Deer populations cannot come forth and speak for themselves in such matters, they are subject to the whims of men. I feel that the Deer & Elk should have their birthplace places protected, its not like they have many places all over the state.

Thank you for very much for your time with these so important matters.

Sincerely,



Janne J. Hoyer
P.O. Box 236
Black Hawk, Co
19122

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9-24-87

Dear Mr. Vecchia,

We are writing to inform you of our feelings on the wilderness recommendations of three areas in the Montrose BLM district. We frequently use wilderness areas of the state for backpacking trips. We have hiked in all but two wilderness areas of the state. We are very concerned about the future of "wilderness" in our nation.

We are happy to hear that the BLM is proposing to protect the Gunnison Gorge area. This area with its proximity to the Black Canyon of the Gunnison National Monument and 13 miles of the Gunnison River will make a wonderful addition to the other areas in the state.

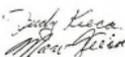
The Camel Back area seems to fall into wilderness consideration and we would like to know your reasons for not recommending this area. We understand that there are no resource conflicts and that grazing is to be cut back in this area to protect the riparian zone. Why not protect the entire 10,402 acres with a wilderness designation? We would like to see this area of the Uncompagme Plateau saved before it is too late. Please explain your stand on this.

We also ask you to recommend the Aboke Badlands for wilderness as it has sweeping vistas and is home to an endangered cactus. This area has little resource potential and it would be nice to have an area that is in contrast to our mountains and riparian wilderness areas.

We thank you for your time in considering our views on this matter.

Sincerely,

Marv Kienz
211 S. Wilson
Castle Rock, CO 80104



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6-22-87

06-22-87

Julia M. Swanson
P.O. Box 66
Laramie, WY
82001-0066

Julia M. Swanson
P.O. Box 66
Laramie, WY
82001-0066

Dear Greg Goss,

Dear Goss,

I am writing to you about the Storm King Sky Area Study area. I am excited by the development of a site within this area. This is a very exciting project and will help protect our natural resources. Please don't forget to check out the Storm King Mountain area. Please don't forget to check out the Storm King Mountain area. Please don't forget to check out the Storm King Mountain area. Please don't forget to check out the Storm King Mountain area.

I am writing to you about these areas: Sunstone Gorge, Camel Back (Buckhorn Canyon), and Adobe Badlands.

First of all on the Sunstone Gorge thank you for your recommendation of a 21,000 acre of the Sunstone Gorge Wilderness Study Area for Wilderness designation.

Second, please recommend the Camel Back for Wilderness Protection. Thank you for outlining back on the map to protect the Sunstone Gorge. We need to protect the Sunstone Gorge. It is a major landscape of western Wyoming. There are also some endangered plants and the big game herds that need protection. There is no status or mineral conflicts here. Please work hard to protect this area along with the Sunstone Gorge.

Third, please recommend the Adobe Badlands for wilderness designation. This area is home to endangered species, the mineral potential is low, and there is no status to fall. Thank you again for protecting this area as off-road vehicles. Please don't forget to protect this area along with the Sunstone Gorge. Thank you very much.

Sincerely,

Julia M. Swanson

Sincerely,

Julia M. Swanson

64

page 2. 64

207-22nd,
Grand Junction, Co. 81503
September 23, 1987

Gene Vecchia
BWP Team Leader
BWP
2305 S. Townsend Ave.
Montrose, Co. 81401

Dear Mr. Vecchia,

As a citizen of western Colorado and an avid outdoorsman I would like to offer my thanks and congratulations to you and the BLM for the wilderness designation recommendation for the Sunstone Gorge Wilderness Study Area. If the recommendation is accepted an invaluable and irreplaceable part of the west will have been saved from further exploitation and will have been afforded the necessary protection so that future generations may too enjoy its splendor.

To my consternation though I understand that in your draft for the Uncompaghe Basin BWP that you have failed to include of the Camel Back Study Area for wilderness protection. I find this very disturbing and the decision borders on the ludicrous. A public accounting for this decision is certainly in order, especially in light of the BLM's admission that there are no resource conflicts with wilderness designation for the area. That such an incredibly diverse and beautiful area as the Uncompaghe Plateau has no designated wilderness areas is in itself a disgrace. At hand lies the opportunity to rectify this situation, albeit in a very small way. I ask that the Camel Back Area be given wilderness designation, to do otherwise would be a tragedy.

Another discrepancy in the report I would like to address is the omission of the Adobe Badlands from wilderness designation. Again, this decision is uncompromisable. Those familiar with the area know any resource conflict is virtually non-existent while the beauty and solitude offered are quite unique. Most of the BLMs have been severe) and recklessly sound for generations, surely at least this very small part deserves the protection afforded by wilderness designation. Again, I must ask the BLM to publicly explain its' decision in this matter and ask that the decision be sensibly reversed.

The issue of the Storm King Ski Area Site is also very disturbing to me. By the BLM's own admission the ski area would eliminate a critical elk-calling habitat and mule deer farming area. In a time of ever increasing pressure upon big game populations by hunters and development how can rationalize the sacrifice of this habitat is beyond me. As both a hunter and a conservationist I find the decision to allow a 5-year grace period to which development would proceed to be absolutely indefensible. In a time when all long range forecasts for the ski industry say the sport faces declining numbers because of the aging of the baby-boomers it becomes all the more ridiculous to sacrifice such an important area to the short-term profits of a few developers. I ask that this decision, too, be reversed for the sake of all long term interests.

Another area of personal concern is the off-road-vehicle use on public lands. This situation is entirely out of hand. No area is more

55 misuse and destruction by these ORV's. Is there no set of existing regulations covering this growing problem? If not, why not? Granted, a powerful lobby exists that would oppose any restrictions but surely in the light of the ever increasing damage being done to lands under BLM management the BLM itself should draw up, at least, minimal guidelines.

I would suggest that because the evidence is so overwhelming that the users of ATVs and dirt bikes are unable, or unwilling, to use public lands in a responsible manner that they be banned entirely. At the very least they should be restricted to existing roadways only, with stiff fines for any offenders. Hunt's should be restricted to the roadways also, with the same penalties against offenders. I know enforcement would be difficult, at best, but, as on Forest Service lands where restrictions are in force, the simple posting of restrictions would, in most cases, reduce the damage considerably.

Thank you for your time and consideration. I would appreciate hearing from you regarding these issues.

Yours truly,

Gene Vecchia
Gene Vecchia

cc, Congressman Ben Campbell

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arise from two important aspects of American life: the sudden flowering of a vigorous conservation ethic, and the innate religious impulse common to most humans.

THE CONSERVATION FACTOR

When white people first came to the North American continent they stumbled upon one of the richest pieces of real estate on earth. The land contained everything needed to support a large human population--vast stretches of rich soil; a moderate climate; for the most part, adequate rainfall; a wonderful system of rivers; hundreds of miles of forest and grassland; generous deposits of minerals; a land teeming with wildlife.

With the sudden development of the industrial revolution, which made possible a speed and degree of exploitation never before imagined, and the immigration of a vigorous and ambitious population, that vast storehouse has been harvested at a rate unparalleled in human history.

Rivers and groundwaters have been polluted. vast piles of poisonous wastes have been left exposed to the elements. The air in many areas has become unfit to breathe. Top soil is rapidly being flushed into the oceans. The readily available minerals have been mined. Forests have been leveled and native grasslands plowed up. Huge herds of game animals have been eliminated. Unfortunately, much of this exploitation was done not to satisfy legitimate human needs but to make a fast buck, and to bell with the consequences.

The situation has deteriorated to the point where the American people are beginning to recognize that if we are going to survive as a nation and as a people we need to begin to avoid waste and pollution, we need to clean up our messes, and we need to begin to live frugally on the land.

THE RELIGION FACTOR

Any religion worthy of the name has some beliefs about the creation of life and of the universe. It also has something to say about how we humans should relate to the creator and to creation. The native American religions, for example, have certain beliefs about a great spiritual father and also regard the earth as our mother. They teach that we should conduct ourselves with reverence toward both.

Christianity is no exception. The first words in the Bible are, "In the beginning God created the heaven and the earth." Then it goes on to point out man's place in the scheme of things--

Dear Sir,

I very much approve the BLM's decision to recommend the Gunnison Gorge for wilderness designation. Over much of its length the canyon of the Gunnison river is one of western Colorado's jewels. It is a splendid recreation area for residents and visitors alike. Perhaps wilderness designation for the gorge would also help secure wild and scenic classification for that section of the river, which I also support.

However, it is difficult to understand why the Adobe Badlands area in Delta County and the Camel Back area in Montrose County were not recommended. Both areas contain significant beauty and, as the BLM's own studies indicate, both areas have very little if any scenic potential. It is difficult not to conclude that there is an inherent bias against wilderness.

Although several surveys have shown that there is widespread support among the American people for wilderness, there seems to be a perception on the part of some, perhaps especially among those who hope to make money off of the public domain, that wilderness areas are primarily for the exclusive benefit of a few, highly outdoor types, often referred to as "elitists". It seems to me that this is a misconception.

It is true that, since rebuilding is not permitted, those who can only experience the out of doors in a car are pretty much excluded. But would those who use this argument suggest that a road should be built to the top of every mountain peak in the state to accommodate these people?

Unfortunately, life is like that; not everybody can do everything. Young children cannot appreciate the joys of sex. Old women can't have babies. No matter how much I may want to, I can never be a professional football or basketball player. People who are too poor to get out of the inner city can never experience the beauty of the Grand Canyon. One could go on.

My personal perception is that support for wilderness, even among those who may never hope to visit one of the areas,

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page 3

that he was placed in the garden of Eden "...to dress it and keep it", not to despoil it or ruin it or exploit it, but to make it beautiful and fruitful and enduring.

Many of the Psalms continue this theme. The 19th, for example, begins with the words, "The heavens declare the glory of God and the firmament sheweth his handiwork." The 24th begins, "The earth is the Lord's and the fulness thereof, the world and they that dwell therein." And in the book of Revelations (11:16-24) thanks is given to God because, among other things, he is going to "...destroy them which destroy the earth."

It is too bad that we find it necessary to get aside certain small sections of the country as wilderness areas, actually, the whole earth should be treated with respect, but at least it is a small step in the right direction. We owe it to ourselves, to our children, and to our noblest beliefs to tread so lightly on the earth that we leave the smallest tracks possible.

I would like to see the BLM reconsider its decision on the Adobe Badlands and the Camel Back study areas.

Sincerely,

Chuck Verley

Chuck Verley
Cadarege, CO

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28 Oct. 67

Dear Gene Uecker,
I attended the hearing in Hatcher's and agree with the Gunnison Gorge being a wilderness area; also having seen Camel

Back and Adobe Badlands we think they should be included in the wilderness area of western Colorado.

We disagree with the storming the area, especially the trial period.
(over)

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Thanks for the good
work you have done
Protecting our greatest
Natural resource

Sincerely,

William J. Tomlinch

Kathleen A. Tomlinch

John R. Tomlinch

Maile A. Tomlinch

Luke R. Tomlinch

527 Gilpin St.
Denver, CO 80218

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2709 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

We would like to thank the RMP for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. We support continued protection of the Gunnison Gorge.

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We would also like to see the Camel Back Wilderness Study Area and the Adobe Badlands recommended for wilderness designation. By BLM's own admission there are no resource conflicts with wilderness designation of the area. We hope that these two areas will be preserved.

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One other area which concerns us is the potential Storm King Ski Area site. We do not support another ski area in Colorado, especially in an area which happens to be critical elk calving grounds. At the very least, the plan should assess compatibility of resources, not give one a five-year headstart over the other.

Sincerely,

Ellen B. Braaten

Ellen B. Braaten

Eric D. Braaten

Eric D. Braaten

Robert E. Vecchia
RMP Team Leader
Bureau of Land Management
Uncompahgre Basin Resource Area

September 28, 1987

Dear Mr. Vecchia,

Upon review of the draft Uncompahgre Basin Resource Management Plan, I felt it necessary to voice my concerns regarding the wilderness recommendations it contained. I am in full support of your recommendation that the Gunnison Gorge wilderness study area be protected. The 21,038 acres of wilderness that Gunnison Gorge contains is indeed an area worth defending. However, I am dismayed that you did not apply the same reasoning in your consideration of the Camel Back and Adobe Badlands for wilderness protection as well.

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Like Gunnison Gorge, Camel Back contains thousands of acres of beautiful wilderness area. The existence of big game herds and several endangered species of plants that currently thrive in Camel Back could be threatened if the area remains unprotected. As well, there are no timber or mineral conflicts in the area that could justify allowing its wilderness qualities to be destroyed.

The Adobe Badlands is another area that needs to be protected, not ignored. In addition to being the home of the endangered Sona Basin hookless cactus, the badlands provide its visitors with sweeping vistas of the San Juan Mountains and the Uncompahgre River valley. There is no timber in the area, and four dry oil and gas wells have been drilled nearby the badlands, indicating there is little conflict with a decision to supply wilderness protection. The same rationale used to designate wilderness protection for Gunnison Gorge should be applied to Camel Back and Adobe Badlands as well.

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A final area of concern regarding the draft involves the BLM's decision to allow developers a 5-year grace period in which to proceed with a ski area site on Storm King Mountain. The 1,000 acres of BLM lands located on the north end of Cinnamon Ridge are critical to the survival of elk that use the lands as calving grounds. Such development would also have an adverse impact on mule deer fawning areas. For these reasons, the grace period

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granted in the draft should be eliminated.

I would appreciate your sharing our concerns with the above issues when preparing your final draft of the Uncompahgre Basin RMP.

Sincerely Yours,

Harry Ruperberg
Harry Ruperberg
820 University
Boulder, CO 80302

Dear Gene:

I am a concerned citizen writing in response to your proposal not to protect Camel Back and the Adobe Badlands as potential wilderness sites. Why don't you consider these two positive areas for wilderness designation. By your own admission, there are absolutely no resource conflicts with wilderness designation in the Camel Back Area. I would love an explanation to this positive approach to management of a shrinking resource such as wilderness.

As far as the Adobe Badlands goes - Again there is virtually no resource conflicts - no timber, no minerals and the BLM intends to close it to OCV use. So why not designate it wilderness and let everyone in the United States know. If you could send me an explanation as to why these two areas are not being considered for wilderness - I can be reached at - Box 650 Winter Park, CO 80082

Thanks Roger Mathison

1374 E. Third Ave.
Durango CO 81301
September 30, 1987

Gene Vecchia
RHP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I wish to thank the BLM for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection.

I also wish to ask the BLM to recommend Camel Back for wilderness designation. There are no resource conflicts. This landform, its herds, and its plant species need protection to avoid gradual destruction.

And, finally, I hope the BLM will recommend Adobe Badlands for wilderness.

Thank you

Sincerely,

Victoria and William Coe

Victoria and William Coe

Dear Sir:

Thank you for your recommendation FOR Wilderness for Gunnison Gorge. I urge you however also to SUPPORT WILDERNESS DESIGNATION for Camel Back and Adobe Badlands in their entirety.

I would also like to urge you protect Storm King Mountain for its elk habitat.

Thank you.

Jan Siphke
2988 26th St. #12
Sedalia, CO. 80201

Sincerely,

CLAY BEALING
MARY Mc ARVE BEALING
1876 N'S ROAD
FRUITA, COLORADO 80421

Dear Mr. Vecchia -
We would like to comment on the Uncompahgre Basin Resource Management Plan:

- We do not see any reason why the Adobe Badlands should not be recommended for wilderness. Since there are very few conflicts, this designation should be granted.
- The Camel Back area should also be designated wilderness. There are clearly no wilderness conflicts, and Camel Back is one of the last wild areas on the plateau.
- We are very pleased with the wilderness recommendation for Gunnison Gorge, and hope that we can encourage more wilderness action.

Sincerely,
Mary Sedwick

613 Maxwell
Boulder, CO 80302
Sept. 20, 1987

Gene Vecchia, RMP Team Leader
Bureau of Land Management
3505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

I wanted to comment on the draft Uncompaggre Basin Resource Management Plan.

62 First, I want to endorse the recommendation of the Gunnison Sorage for wilderness protection. This would make a fine addition to the Wild and Scenic Rivers trust. The expansion of the area adjacent to the still really protected Black Canyon is right in line with the latest thinking of the need to protect large areas of natural ecology. Small ecosystems are not as inherently stable, and every measure to increase their size helps.

Next, I am disappointed that the Camel Back and Adobe Bedlands were not included in the wilderness recommendation.

136 Camel Back, according to your own report, has no mineral conflicts. The area is one of the few potential wilderness areas in the Uncompaggre Plateau, which currently has no designated wilderness. I think that this area should be included for wilderness recommendation to avoid the degradation by road building, which is sure to happen.

68 I don't understand the lack of inclusion for Adobe Bedlands. Clearly again, there are no mineral or timber conflicts. This desert with its fine views should be protected by wilderness recommendation.

69 Finally, I don't understand the Bureau's intentions with the potential Stora King ski area site. With the downsizing in ski business, along with increased competition from existing areas, I really don't think that another destination ski area has such a chance. So I don't think that the local economy will really get a boost from developing it. To gamble the certain loss of ski carving grounds against profits for a few developers is wrong. The Bureau's 5 year wet-and-rewet plan will give the developers a free leg up, at the expense of the other resources, primarily oak.

As a professional engineer who likes to ski, hike, and enjoy the wilderness, I would like to think that the BLM is considering people like me and our concern for wilderness in its management plans. There is so little to lose in protecting wilderness, and so much to gain.

Thank you for reading my comments.

Sincerely,

Timothy J. Cunningham, P.E.

3505 W. 39th Ave.
Denver, CO 80211
September 10, 1987

Mr. Gene Vecchia
RMP Team Leader
Bureau of Land Management
3505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

68 I strongly recommend the inclusion of Camel Back
136 and Adobe Bedlands in the proposed Gunnison Sorage Wilderness area. This is part of the Uncompaggre Plateau, yet it has not a single acre of designated wilderness. Camel Back is one of the handful of potential wilderness left on the plateau.

Yours truly,

Mrs. Lorraine Lane

Gene Vecchia
RMP Team Leader
BLM
3505 So. Townsend Ave.
Montrose, Co., 81401

Dear Sir,

I wish to address recommendations in your draft Uncompaggre Basin Resource Management Plan.

First, I support the designation of Gunnison Gorge OSA for wilderness. This is in my opinion the strongest feature of the draft plan and an exceedingly good idea.

136 I urge that the Camel Back area also receive wilderness protection due to its place as one of the few areas on the Uncompaggre Plateau that could preserve a wilderness character there. I urge that the wilderness qualities there be kept, not lost, especially given no real resource conflicts with such an action.

68 I believe Adobe Bedlands also warrants wilderness preservation. The vistas alone they provide are worthy of protection. They, too, have low resource conflicts and, in my opinion, hold no real obstacle to a wilderness designation.

69 Finally, I oppose any allowance for ski area development on the north end of the Cimarron Ridge. The plan acknowledges the importance of that area for ski carving and mule deer ravening. Our state has lost too much such habitat already. I urge the BLM to make a strong commitment to preserve this area for wildlife habitats.

Thank-you.

Sincerely,

Mark Newks

500 St Paul
Durango, Co 81306

728 S. Stout
Boulder, CO 80302
October 3, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
3505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

68 I am writing this letter to you to ask that
136 the BLM recommend the Camel Back and Adobe Bedland Wilderness Study Areas for wilderness designation. These are beautiful areas with virtually no conflicts, such as timber, mineral. So I don't understand your decision for their non-wilderness recommendation. Could you explain to me why?

I do want to thank you for recommending all 21,037 acres of the Gunnison Stage W.S.A. for wilderness protection. It's a precious area and should be protected.

69 Finally, I request that you manage Stora King Mountain for all and not ski area development.
Catherine

Sincerely yours,
Dore & Benjamin

Grand Junction, Colo. 77
Oct. 7, 1987

Dear Mr. Vecchia,
It appears that you have
earned some promotional recognition!
Regarding the wilderness
recommendations, the BLM is
right on with Gunnison Gorge.
Thank you, and all those involved.

I believe that Camel Back
should also be recommended for
wilderness. We should be more
generous toward wilderness than
we are toward those who so
constantly and consistently
compromise and destroy wilderness
values.

In addition, Storm King
Mountain should be recognized
for deer and elk. More than
enough of our mountains are
dedicated to the ski industry,
a situation that can never be
reversed.

Sincerely,
Harley Oakwood
(USFS, Retired)

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Robert E Vecchia
RMP Team Leader-BLM
2505 South Townsend Ave.
Montrose, Colo 81401

Dear Mr Vecchia,

The best alternative offered to support
the multiple-use objective with the fewest
detriments to livestock grazing, is the
"Continuation of Current Management."

I strongly oppose all wilderness
Areas. We need our cattle industry. As
far as any damage to the area by cattle
I have seen areas hundreds of cattle
graze on and pass through with no
ill effects, only tramped in seed and
fertilizer, also less fire hazard because
it is grazed.

I have also seen where only a handful
of people camp or pass through with
cans, glass, plastic and general trash
left cluttering the area for years to

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Come. The cattle people have
managed these lands for years
and do take care of the land. They
have respect for it. Please see
it to back them.

Mrs Robert Gray
4291 Cedar Rd
Bells, Co 81416

86

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompagre Basin Resource Management
Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest
detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance
livestock grazing and wildlife and riparian habitats, control erosion and salinity,
utilize mineral and forest products, and protect our diverse recreation interests
can be met on a site-specific basis.

Jones, Janet Luce
Fisher

Signed:

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Gene Vecchia, RMP Leader
Bureau of Land Management
2503 S. Townsend Ave.
Montrose, CO 81401

October 14, 1987

Dear Mr. Vecchia:

I would like to congratulate the BLM on its wilderness recommendation for Gunnison Gorge. It is to be hoped that this protection will soon be law.

I would like, however, for the BLM to reconsider its non-wilderness recommendation for the Camel Back Wilderness Study Area. There are known resources of importance here, by the BLM's own admission, and wilderness designation would protect this important riparian community on the Uncompahgre Plateau. I hope the BLM will also recommend the Adobe Indians, with its rare hoodlum catons, for wilderness designation.

Sincerely,

Ernest Berger
Ernest Berger
Box 426
Aspen, CO 81612

Mark N. Williams
Attorney at Law
107 Main Street
P.O. Box 23
Grand Junction, CO 81502
920-2423111

October 12, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2503 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Your Bureau's plans for future recommendation of land use regarding desert wilderness designations have come to my attention. I want to thank you for your recommendation concerning the Gunnison Gorge. I must express my distress, however, concerning your Camel Back and Adobe Badlands recommendations. I request that your organization take another long, hard look at the recommendations and do more extensive research, study and re-thinking before excluding Camel Back and Adobe Badlands from desert wilderness designation.

I was appalled at your giving thought to allowing yet another ski area in Colorado such less one at the north end of Cimarron Ridge. To even think of disturbing the elk and deer habitat is ludicrous. I was under the impression the Bureau was organized as a steward for this country's natural resources. Please do not allow private developers to misguide your guardianship.

Please, rewrite your recommendations for Camel Back, Adobe Badlands and Cimarron Ridge for the preservation of our wilderness areas that need so much protection.

We must preserve our wilderness areas. It is vital that the Bureau and the citizens of the area discuss and study these arbitrary decisions before they become policy.

Sincerely,

Mark N. Williams
Mark N. Williams

MNW:rh

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allotment Management Plans, the objective to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: *Cheri W. Pettis* 10-12-87
Herbert E. Pettis 10-12-87

Date:

Robert E. Vecchia
RMP Team Leader - BLM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement: I (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: *Cheri W. Pettis* 10-12-87
Herbert E. Pettis 10-12-87

Date: 10/12/87

Robert E. Vecchia
 RFP Team Leader - BLM
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Edward J. Boyer
Edward J. Boyer
 Edward J. Boyer

Signed:

Date: 10/12/87

Robert E. Vecchia
 RFP Team Leader - BLM
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement: I (do) ~~disagree~~ agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Cannon Gorge Wilderness Study Area.

The Chasel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Edward J. Boyer
Edward J. Boyer
 Edward J. Boyer

Signed:

Date:

Robert E. Vecchia
 RFP Team Leader - BLM
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed:

Mr & Mrs William Boyer
Mr. Edward Boyer
Edward Boyer

Date:

Robert E. Vecchia
 RFP Team Leader - BLM
 2505 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement: I (do) ~~not~~ agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Cannon Gorge Wilderness Study Area.

The Chasel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed:

Mr & Mrs William Boyer
Mr. Edward Boyer
Edward Boyer

10-12-87

Robert E. Vecchia
 RPO Team Leader - BLM
 2305 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detractors to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

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Name

Alfred Gray
 Patricia Harris

Address

Clatch, Co. 81425
 Clatch, Co. 81425

Signed:

10-12-87

Robert E. Vecchia
 RPO Team Leader - BLM
 2305 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement:

66 I (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Case! Back and Adobe Badlands Wilderness Study Area will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
 136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Name

Alfred Gray
 Patricia Harris

Address

Clatch, Co. 81425
 Clatch, Co. 81425

Signed:

90

Gentlemen,

I am writing to you again about the proposed Caseback and Adobe Hills wilderness study areas.

I am a native. My grandparents were cattlemen on a ranch near Norwood. In those days they didn't have income and property taxes. Today cattlemen still don't pay taxes and they receive subsidies, handouts, low interest loans, bailouts, etc. They are for the most part the complete opposites of the independent self-sufficient people of the past.

The history of The Uncompaggre after the forced departure of the Ute Indians is of total exploitation. Huge cattle concerns, many from people in England who never saw or cared about the land proceeded to rape it. "Competition for grass reached self-destructive excesses when the range was wide open. Each cowman stocked his area with as many cows as he could lay cash or mortgage to and grazed to the roots. If he didn't, somebody else would. The herds were enormous. One old-timer remembers seeing fifty thousand head in one bunch held for shipment on what is now Grand Junction suburb-- The Redlands.

Overgrazing brought on regulation to save the mountain from dying, as mountains up around Gunnison died in that area. To bring grazing within the capacity of the range to maintain itself, the Forest Service gradually (and proportionately) reduced the herd population of the allotments.

Today sagebrush, clumps of pinon-cedar and the desert environment are a direct result of past and present abuses.

The 1930 Taylor Grazing Act started the BLM. It covered land not in control of the Forest Service.

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I live on Log Hill and personally know how hard it is to return the land to its former productive self. It will probably take twenty or thirty years on my 40 acres.

Special interest groups like to mention the multi-use or more properly the multi-abuse approach to public land management as though it was a popular approach, nothing could be further from the truth. During the Ford Administration they had hearings all over for the proposed wilderness areas. Citizens who testified at the Forest Service hearings in Colorado in January of this year or submitted statements for the record supported nearly five to one the Colorado Open Space Council citizen recommendations for three wilderness areas totaling about 172,000 acres.

Certain special interest groups especially the Chamber of Commerce whispered in the more than receptive ear of the Ford Administration who whispered into the Forest Service's receptive ear, that they didn't like the outcome of the hearings. It's interesting to note that former president Ford has a vested interest in the Beaver Creek Ski Area.

We have a responsibility to future generations to see that they have places to go and enjoy untouched wilderness areas free from small-narrow-minded special interests groups who want public land for they're own private use and profit.

Sincerely,

W. Rodney McKinnon
 76866 County 81
 Montrose, Colorado 81401

1. Uncompahgre, Miguel MacShall P/35 Caxton Printers, Ltd. Caldwell, Idaho 1991

2. The Denver Post, Sunday Dec. 8 1974 P/3E. The quote was from Clifton Herrick, regional director of the Wilderness Society.

Mike Campbell
P.O. Box 112
Oak Creek, CO 80466

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2525 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia;

I want to begin by thanking you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Study Area for wilderness protection. I grew up in Gunnison and was often impressed by this areas fishing and hiking.

I also want to ask you to recommend both Dobe Badlands and Camel Back (Roundhead Canyon) for wilderness designation. By BLM's own admission, there are absolutely no resource conflicts with wilderness designation in these areas. Both areas have low potential for minerals and there is obviously no timber. Your positive steps in these areas has ~~not~~ not ~~been~~ gone unappreciated (your intentions to cut back on grazing in Camel Back and your intentions to close the Dobe Badlands area to off-the-road vehicle use).

My final appeal to you is my belief that the potential Storm King Ski area should be

eliminated now rather than allowing them the 5 year grace period in which the developers may proceed with the ski area development. I feel the elimination of elk calving habitat, as well as the large negative impact on wild deer fawning areas as a result of the developer actions should definitely be avoided.

Thank you for your time and consideration.

Sincerely,
Mike Campbell

October 8 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S Townsend Ave.
Montrose, Co. 81401

Dear Mr. Vecchia

I would like to provide brief comments regarding the recently released Uncompahgre Basin Resource Management Plan. As a frequent visitor to this portion of the state, I have had the pleasure to enjoy this fine area (as well as aid the local economy through purchases at local stores). My purpose to visit is not to view logging areas or oil rigs or other such industrial artifacts but to enjoy the lasting beauty of the terrain.

It is with real regret that I learned the plan does not designate certain areas for wilderness protection that really deserve it. It appears the Gunnison Gorge has been recommended for wilderness protection and that is perfect. That river is a recreational resource that will do more for the economy and environment over the years than any development ever could.

But what happened to Camel Back and Adobe Badlands? The Camel Back area has no mineral value at all as referenced in the plan itself and should be designated for wilderness in that the Uncompahgre Plateau includes no wilderness at all at this time! THIS AREA SHOULD BE DESIGNATED AS WILDERNESS.

I am not as familiar with the Adobe Badlands but it appears this area has no mineral or logging values at all and it should be preserved as wilderness.

Please incorporate these comments into your review process and alter the plan to reflect these areas as wilderness.

Thank you for your consideration and action on these thoughts.

Sincerely,

Edward G. Seiboo
6333 Humball Street
Arvada, Co. 80003

Date: 10/14/87

93

Robert E. Vecchia
RMP Team Leader - RLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompagre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allotment Management Plans, the objective to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

I have had a permit since 1920 and I find the current management is taking care of our range in best condition.

Howard L. Busch
Hills 70 Ranch

Signed:

Date: 10/14/87

94

Robert E. Vecchia
RMP Team Leader - RLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompagre Basin Wilderness Technical Supplement I (2a) (do not) agree with the RLM's Proposed Action, the All Wilderness Alternative, for the Cañon George Wilderness Study Area.

The Canal Bank and Adobe Badlands Wilderness Study Area will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management site-specific objectives can be mitigated through the Allotment Management Plans.

The best area wilderness in the Canal Bank area is it is best managed under multiple use.

Howard L. Busch
Hills 70 Ranch

Signed:

86

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Andrew McCahey
3590 Berkeley Ave
Boulder, CO 80303
October 13, 1987

Crane Vecchia, RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Please deny permission to develop a ski area on the north end of Cimarron Ridge. Your own plan admits that such a development would eliminate critical elk calving habitat. Your idea for a five-year "pilot period" is a cop-out. You must decide now whether plans for Sherm King ski area should proceed or not. We have the many ski areas in Colorado already. I urge you to protect the elk.

Thank you for recommending Gunnison Gorge for wilderness. I have enjoyed hiking there in the past.

But I do not understand why Canal Bank and Adobe Badlands were not recommended for wilderness. Both areas possess fine wilderness characteristics and no significant conflicting potential uses. Please include these comments in the public hearing record.

Andrew McCahey

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JOHN C. CALHOUN AND ASSOCIATES
CERTIFIED PUBLIC ACCOUNTANTS

800 PALMER STREET
P. O. BOX 400
DELTA, COLORADO 81404
RTA 8761

MEMBER OF CALIFORNIA CPA
MEMBER OF CALIFORNIA CPA

MEMBER
AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS
MEMBER SOCIETY OF LICENSED PUBLIC ACCOUNTANTS

October 19, 1987

Robert E. Vecchia
RMP Team Leader
2505 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Having lived in this area all my life, and seeing the improvement in range conditions over the past years I would support the continuation of the present continuation of the multiple use management concept.

The use of the land for livestock grazing, wildlife, recreation, mineral exploration, and forest products must be considered as of imminent importance to the "West" and the United States.

The canal bank and adobe badlands should be excluded from wilderness classification because of historical use. The change of ownership of the Black Canyon may very well call for the change in classification which does not bother me in the least. The other areas, in my opinion, do not lend themselves to wilderness classifications.

Very truly yours,

George C. Calhoun
George C. Calhoun

ME: D.E. Gore
36850 Fern Rd.
Olney, CO 81423

97

Gene Vecchia
RMP Team Leader
Bureau of Land Mgt.
2505 S. Townsend Ave.
Montrose, CO 81401

1946 Clover Court
Grand Junction, CO 81502
October 19, 1987

October 16, 1987
Box 263
Florissant, CO 80816

Dear Mr. Vecchia:

The purpose of this letter is to comment on the Resource Management Plan for the Uncompahgre Basin.

I wholeheartedly support wilderness protection for the Gunnison Gorge. The area is beautiful, unique, and wild. Even now, however, helicopter parties come into parts of the lower gorge for fishing. Please maintain your strong stand to protect this unique resource.

I am baffled by the Storm King Ski area plan. Here in Grand Junction, our beautiful ski area has been in financial trouble for years. A new owner was sure that fixing up some things would improve revenue and now he is facing the possibility of the bank taking over. Many other areas have gone up to \$30 and more ski passes. Can you afford to ski? My family cannot - but we can afford to hike and camp and x-country ski and that's why wild areas must be maintained. This area is important elk habitat. Please preserve it as such.

I have hiked Robideau Canyon on the Uncompahgre. Its the best place on the plateau. Your plan really gives no rationale for not recommending wilderness designation. I have small children and I want them to have areas like this to show to their children in 20 years. The Camel Back area is wilderness - please designate it as such.

Finally, what about the Adobe Badlands? Yes this is badlands. Thank goodness you are banning off-road vehicles. So many of these areas are overrun with OORVs - and that's fine. They need some places, but hikers need some too. Hiking through an open desert and knowing you cannot be run over by a motorcycle is a wonderful feeling. The views from this area are spectacular. Let the hikers have one of these areas too and designate Adobe Badlands as wilderness.

Thank You
Gene Vecchia
Nic Korte

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

It is my understanding the BLM is in the process of finalizing the Uncompahgre Basin Resource Management Plan. It is doubtful anything I can suggest will be of value even tho I have spent over thirty-five years in land management in the National Park Service and private ranching. It seems each new generation of land managers must re-invent the wheel without fully utilizing past experiences and studies (?).

Regardless, please keep in mind that wilderness designation can always be rescinded but wilderness can't be regained within a lifetime, as you evaluate the Gunnison Gorge, Camel Back, and the Adobe Badlands.

Please consider the pure economic point-of-view in evaluating the Storm King Ski area site. A successful ski area of moderate size in Colorado is shaky at best and many have incurred bankruptcy in recent years due to the industry's overall. It is ludicrous to think the area's economic can be bettered by a ski area over current big game hunting resources.

Often the best management of land is to physically leave it alone. I can only hope your successors will be proud that you left them something to manage wisely.

Sincerely,

Jack S. Williams
Jack S. Williams

October 16, 1987

Gene Vecchia
BUREAU OF LAND MANAGEMENT
2505 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

First, I would like to commend the BLM for recommending the Gunnison Gorge WSA for wilderness protection. Secondly, I would encourage the BLM to recommend that Camel Back and the Adobe Badlands also be given wilderness protection. Both areas have little to offer them in terms of mineral or other resources, and I believe that both areas would be a unique addition to our wilderness lands, especially Camel Back. Again, thanks for Gunnison Gorge.

Sincerely,
John M. Kuzemak.

Date: 10-1-87

Robert E. Vecchia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest sacrifices to livestock grazing, is the "Wilderness/Current Management". Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed: *Al Hahn*
Al Hahn
10/1/87
10/1/87

Robert E. Vecchia
 RFD Team Leader - BLM
 2305 South Townsend Avenue
 Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompagre Basin Wilderness Technical Supplement:

66 I ~~do not~~ (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the
 136 ~~Uncompagre Basin Wilderness Study Area. This alternative best exemplifies the management objectives of the Uncompagre Basin Wilderness Study Area. Specific objectives can be attained through the All Wilderness Alternative.~~

Signed: Al Nelson
 Al Nelson
 1011 So. Mt.
 Delta, Colo.
 81411

10-22-77

10/20/77

Dear Mr. Vecchia,

I would like to begin by expressing thanks to the Bureau of Land Management for recommending all 21,038 acres of the Uncompagre Basin Wilderness Study Area for wilderness protection.

In addition, I would like to strongly suggest BLM wilderness protection for the Camel Back area and Adobe Badlands. By your own admission, there are absolutely no resource conflicts with the Camel Back area. Camel Back is one of only a few potential wilderness left on the Uncompagre Plateau and wilderness designation would greatly benefit big game herds as well as several endangered plant species. The BLM's intention to allow gradual destruction of this beautiful wilderness is an approach I cannot understand. Please seriously reconsider.

As for the Adobe Badlands, this area offers no timber and apparently little mineral value. What is to keep us from preserving this area for the enjoyment of future generations to come? The Badlands provide sweeping vistas of the Sangre Mountains and the Uncompagre

68 River valley and are home to an endangered cactus species as well. Please recommend the Adobe Badlands for wilderness designation.

Thank you for your consideration in preserving these beautiful and precious wilderness areas, which have so little value to developers yet so much to offer if left in their natural state.)

Sincerely,
 Diane Kelly
 2757 Scota Rd.
 Evergreen, Co.
 80439

10/20/77

Dear Mr. Vecchia:

Please recommend Camel Back and the Adobe Badlands for BLM designated wilderness areas.

68 Just two sites are provided for
 136 recreation, wildlife, geophysics, water, fossils and archeological sites. Only two percent of Colorado is still wilderness and more are than in this land. The sites recommended for protection by BLM have no resource conflicts in these two areas, so recommending them would be adding a minimal cost. Any support you can offer in this direction will be greatly appreciated. Also, I would like to thank BLM for recommending the Gunnison Gorge as potential wilderness. Since I live in that area of Colorado and have the ability of it, I am greatly appreciative. Thank you for your time and consideration.

Sincerely,
 L. Fred Stein
 704 N. Blvd.
 Gunnison, CO
 81230

OUTLET #, 1967
 RAYE SPURTS
 APR 21
 GARLAND, CO 81040

GENE VECKHA - RMP TEAM LEADER
 BUREAU OF LAND MANAGEMENT
 BOX 3 TOWNSEND AVE.
 MOUNTROSE, CO 81051

DEAR MR. VECKHA:

I HAVE RECENTLY BEEN INFORMED
 BY THE COLORADO ENVIRONMENTAL
 COALITION THAT THE CAMEL BACK
 AND ADOBE BADLANDS AREAS HAVE
 BEEN DISREGARDED FOR PROTECTION
 AS WILDERNESS AREAS. I CONGRATU-
 LATE YOU FOR THE RECOMMEN-
 DATION OF THE GUNNISON GORGE
 AREA AND I URGE YOU TO PLEASE
 NOT STOP THERE.

I AM NOW REQUESTING THIS ~~FOR~~
 FOR THE STATE'S BENEFIT OF TOURISM,
 BUT BE TRUST MYSELF AND OTHERS WILL
 HAVE ANOTHER PLAYGROUND CHALLENGE

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ARE GOOD I WILL NEVER EVEN
 VISIT CAMEL BACK NOR ADOBLANDS.
 I AM REQUESTING THIS BECAUSE I
 BELIEVE THAT WILDERNESS REMAINING
 WILDERNESS IS A GOOD ENOUGH
 REASON IN AND OF ITSELF. IT
 NEEDS HAVE NO POSITIVE BENEFIT
 TO MAN TO JUSTIFY ITS
 PRESERVATION; HOWEVER, WITHOUT
 MOST OF US REALIZING IT, ITS
 PRESERVATION IS THE GREATEST
 BENEFIT WE CAN EVER RECEIVE
 FROM IT.

SINCERELY,

Raye Spurts

105

Dear Mr. Veckha,

I am writing you in support of the wilderness
 designation of the Gunnison Gorge and Adobe
 Badlands areas. I spent a month on a paleontological
 survey in Fruita, Colo. that was seven miles from the
 uranium mines and given to the scientists by the
 BLM. I have seen the merits of this decision
 first hand. These areas are rich in archaeological and
 paleontological artifacts in addition to mountain lion
 den, Elk habitat, etc. Please preserve these areas
 that are so rich in antiquity from the past
 and present for the future. Once again, I applaud
 your handling of the Fruita Paleontology Area and
 am glad of your regarding this action in regard
 to the Gunnison Gorge and Adobe Badlands areas, in accord
 with your impressive record of decisions.

Sincerely,

MARK W. HAMMILL
 UNIT 4, CABO,
 132 ARROYO BLVD
 BOULDER, CO
 80510

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136

Dear Gene Veckha

I am writing to you in regard to
 three proposed wilderness areas in the Montrose
 area that fall under B.L.M. jurisdiction.
 To wit: Gunnison Gorge, Camel Back, and
 Adobe Bad Lands.

First, I would like to thank the
 B.L.M. for recommending the entire 21,038
 acres of the Gunnison Gorge Wilderness
 Study Area for wilderness protection. Thank.

Second, I ask the B.L.M. to reconsider
 its non-recommendation of Camel Back. I
 do not understand why, even after B.L.M.
 studies show there to be no resource conflicts
 with wilderness designation of the area, B.L.M.
 has not recommended Camel Back. It is time
 that the Uncompahgre Plateau, one of the
 landforms of Western Colorado, be given at
 least this small piece of wilderness designation.
 Why has the B.L.M. failed to do so?

Finally, it is beyond reasonable belief
 that the Adobe Bad Lands has been left out
 of the B.L.M. wilderness recommendations. Why
 was this decision made?

As a Colorado native who is deeply concerned
 with the future of our state, I urge you in

100

10-21-87
 106

68 the strongest terms possible to please
 recognize and include both Camel Back
 and Adobe Bad Lands in your pro-wilderness
 recommendations.

Please respond.

Sincerely,

Geoff Will
 P.O. Box 122
 Gardner, Colorado
 81040

Phone 746-2275

10/22/87 107

Gene Vecchia,

I am very concerned about some recent BLM proposals. Although I want to thank you for recommending 21,088 acres of Gunnison Gorge for wilderness protection, I am concerned that Camel Back and Adobe Badlands were not recommended for similar status. Camel Back is part of the Uncompagore Plateau which is a major landform in western Colorado lacking any designated wilderness. Furthermore, several endangered species exist on Camel Back and would benefit from wilderness designation. Camel Back is also one of few places left on the plateau which is a potential wilderness. The Adobe Badlands should also be designated as wilderness since the conflicts with wilderness designation are non-existent.

Another issue I am concerned about is the Storm King Ski Area Site on the north end of Cimmaron ridge. This land is critical for elk calving and mule deer fawning. Allowing the Ski area developers 5 years to "proceed" with the ski area seems like very irresponsible management. Please support the elk on Storm King Mountain instead of the Ski Area developers.

Thank You
 Suzanne Fairchild

108

Dear Mr. Vecchia,

This letter is written to voice my opposition to further encroachment on BLM land. In particular, I am concerned about BLM recommendations concerning the Camel Back and Adobe Badlands.

Since there are less than 10% of all Colorado wilderness lands now protected from further incursion, I protest further recommendations which would allow development of these vital wildland and wildlife refuges.

Please recommend Adobe Badlands, Camel Back, and all of Gunnison Gorge for wilderness designation.

Thank you,

Sincerely,
 Tom Kopf

109

Dear Mr. Vecchia,

I recently found that wild uplands Gunnison Gorge WSA for wilderness protection. Gene Vecchia I also like the your organization. I would like to recommend the Camel Back (Adobe Badlands) and the Adobe Badlands for wilderness protection. This is because how can you say that a small amount of resources is more important than the long range goal of protecting the wilderness, the entire eco-systems, and many endangered species of plant and animal which inhabit the wilderness study areas. Please don't use short-sightedness in your planning - only 4% of the land in Colorado is wilderness, don't let it dwindle away. Please Approve these two WSAs for Protection.

Thank You,
 David Robin

BETTY ANDERSON ELMELL
P.O. BOX 492
LA VETA, COLORADO 81401

Oct 21, 1987

To Steve Veselka,
Dear Mr. Veselka,

This letter is to give my support for the BLM to add Camel Back and Adobe Badlands to their recommended Summer Range for wilderness protection. We cannot afford to lose any more of our endangered species.

I am very much against the development of the Storm King Ski Area. Colo has an oversupply of ski areas that are having a difficult time being solvent, to develop another and thereby eliminating an essential job habitat is very short sighted. Please keep the ski for my great great grand children to ski.

Sincerely,
Betty Elmell

Date of 9 23, 87

Robert E. Veselka
BPO Team Leader - BLM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Veselka,

The following are my comments concerning the Uncompagre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detractors to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and siltation, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

gives me +
Dale Hall

Signed

112

DELTA VETERINARY CLINIC

DR. TOM CORE
1520 Burr St.
Delta, CO 81416

| | | |
|-----------------|-------------|-------|
| RECEIVED | OCT 27 1987 | BLM |
| DELTA | | COLO. |
| CLINIC | | |
| 1520 Burr St. | | |
| Delta, CO 81416 | | |

United States Department of the Interior
Bureau of Land Management
Montrose District Office
2465 South Townsend Avenue
Montrose, Colorado 81401

To Whom It May Concern,

These are my written comments on the Uncompagre Basin Resource Management Plan, Environmental Impact Statement, and Camel Back Wilderness Study Area. I am in favor of the Current Management Alternative for the Uncompagre Basin. I am in favor of the No Wilderness Alternative for the Camel Back Wilderness Study Area. The current system for this area has served everyone very well by utilizing the Multiple Use Concept of Public Land Management. As a current radio commercial says, "if it ain't broke, then don't fix it."

I am also advocating restriction of Off-Road Vehicles (ORVs) to be used only on designated roads in the entire Uncompagre Basin District. The reasons for these restrictions are 1) ORVs cause increased stress and harassment of wildlife on a year-around basis, 2) ORVs do not try to avoid vegetation, but instead drive over grasses, bushes, and shrubs, which leads to their destruction that then causes, 3) increased soil erosion.

My final opinion is a very general idea. I am a recreational user of BLM administered lands. I believe all recreational users of public lands should be charged a user-fee or a yearly user-fee. Historically, other users of public lands such as grazing, lumber, and mining interests have been charged fees for their use of the public domain. To me, it is an inconsistent policy that allows hunters, fishermen, and/or picnickers of scenery to be given a "free ride". As a businessman, I have learned that if anything is given away it is not appreciated, but if something is charged for it is more likely to be used properly and taken care of. I have many times used National Parks and National Recreation Areas where the fee system was in effect. I think people tend to pick-up after themselves more and appreciate what they use when they are charged a fee. Those who use it should pay for it. Finally, a major source of revenue to support and improve public lands is being neglected and left totally untapped by not charging users fees to recreationists.

Thank you.

Robert E. Veselka
BPO Team Leader, D.V.M.
1365 Burr St.
Delta, CO 81416
1-303-874-5190

Dear Sir,

October 20 1987

I am writing this letter to you about the Uncompagre Wilderness Resource Management Plan. It is important that you include several wilderness areas within your Plan, namely the ones known as Garrison Grove, Camel Back (Recreation Area) and Adobe Badlands. The value of these lands combine only 92,000 acres with the same use of 1,235,000 acres within your jurisdiction, which is more 6% of the total.

Although I live on the eastern slope of Colorado, it is valuable to me that land remains in its prime and natural conditions on the western slopes. Land remaining undisturbed on the eastern slope is growing less accessible by every passing year, more visitors are making their impact on the remaining lands, and the erosion and tree necessary to reach truly undisturbed wilderness is also expanding. I do not have the possibility to enjoy the wilderness as often as I would like (which really could be every weekend); instead I find it necessary to compromise and take only a few longer outings each year. I don't believe that I am unusual for the type of person who lives in the quarry metropolitan areas of the Eastern Slope, who finds enjoyment and recreation in experiencing the outdoor activities of fishing, hunting, camping, hiking, cross-country skiing, etc.

I realize that these are other interests vested in these lands which the local inhabitants of the western slope are actively engaged in for their livelihood. I envy them for their lifestyle. However I only feel that some lands remain accessible in the lands under your jurisdiction, so that city folks like me can get out and relax from time to time.

Thank you for your consideration. Good soon ahead.

Jessie Wachtel
500 70th St.
Duris, South #007
Boulder, CO 80510

Oct. 20, 1987 118

Dear Sir :

I am a CU Boulder student writing to you out of concern for Colorado wilderness. I would like to begin by thanking you for recommending all 21,038 acres of the Gunnison Basin Wilderness Study Area for wilderness protection.

I would like to ask you to recommend to the BLM that they give Camel Back a wilderness designation. BLM has admitted that there are no resource conflicts within designating the 10,402 acre wilderness area.

In addition, 10,425 acres called the Adobe Badlands is in need of a wilderness designation. Within these badlands exists an endangered species of catfish, providing evidence of a further need for the designation beyond its positive existence.

Thank you for your time.

Sincerely,

Jessie Wachtel

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2605 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I am writing concerning the recent Unimorphage Basin Resource Management Plan. I understand the RMP covers 483,000 acres of public lands, 42,000 of which are part of a wilderness study area.

Let me express my appreciation for your recommendation of the Gunnison Basin WSA for designation as a wilderness. I was disappointed to learn, however, that the Camel Back and Adobe Badlands WSAs were not included in this recommendation. After considering the lack of conflicting uses for these two areas, as well as the very small percentage of the area of the Unimorphage Basin they represent, I urge you to include the Camel Back and Adobe Badlands WSAs in your recommendation that the Gunnison Basin receive protection as a wilderness area. Your careful consideration of this matter is appreciated.

Thank you, David Orsley

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Gene Vecchia
BLM
Montrose, Colorado

9/25/87
1939 South Broadway
Grand Junction, CO 81503

Dear Mr Vecchia,

Thanks so much for the recent BLM decision to recommend Gunnison Basin for wilderness protection! Many of my friends have fished and/or floated the gorge. As yet, I have had a chance to do neither. I'm glad I still may have the chance.

Please, please, give the same recommendation for Camel Back and the Adobe Badlands. There doesn't seem to be any resource conflict with either one becoming wilderness, however, it is my understanding that the current management plan for Camel Back:

- 1) recognizes no resource conflicts
- 2) intends to decrease grazing in order to protect riparian habitat
- 3) allows wilderness qualities to be gradually destroyed

despite the ever increasing number of people who value wilderness per se as a resource, land, once destroyed, is irreversable! So much of the Unimorphage Plateau has been managed for various other interest groups, that Camel Back is one of the few potential wilderness areas left on the Plateau. As one of the major land forms in western Colorado, there ought to be some small corner kept as wilderness. How can you explain such a non-sensical approach to management of a vanishing resource like wilderness?

And, again, why not recommend the Adobe Badlands for wilderness designation? There the current BLM management plan is to close it to OHVs. The four dry oil and gas wells drilled in the vicinity seem to indicate a low timber resource potential. Certainly the timber people have no interest in the area! Conflicts with wilderness designation seem to be non-existent and yet, inexplicably, this too was not recommended for wilderness designation! Why not?

Surely, you will not be surprised that I also oppose the 5 year grace period under consideration for the (hopeful) developers of the ski area at Storm King. In 5 years, they will have been able to destroy the CRITICAL elk calving habitat. Critical habitat means, sir, that if you take it away, you take away the whole elk herd which traditionally has used it. Male deer fawning areas would also be compromised. After 5

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years of grace for the developers, the damage will already be done! Please, manage Storm King Mountain for the elk and the deer, not for millionaire ski area developers whose quality of living will in no way be affected whether they build this particular ski area or not.

People vacation here from all over the world, few of us are so lucky-- to be able to live here year round. Lets not lose sight of that which makes this a desirable place to be, that which sets our part of the planet apart from all others! Lets not sell it all into homelessness for the sake of a few more ski area dollars, or let its qualities be 'gradually destroyed'. Please accept the responsibility to manage with an eye for the future, that there will continue to be something worth managing, that we and our children may continue to enjoy this country and the pleasures it affords - in perpetuity.

You have my sincere and heartfelt thanks for listening, on my own behalf, and on behalf of my 2 year old daughter, whose entire map time I have spent in writing to you.

Penelope Crocker
Penelope Crocker

copies:

Mr. Armstrong
Tim Wirth
Sam Righabore Campbell
Roy Roemer
Margaret Keenan
Bob Decker
Allen Kistner

Oct 19, 87 120

Dear Mr. Vecchia:

I was surprised and saddened to hear of the wilderness study areas that have not been designated as Wilderness Areas. Since these areas in total represent such a small area of total BLM lands it seems ~~to~~ a small favor to ask that more of our land be set aside to maintain genetic diversity, for further anthropological study, and wilderness research.

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The Camel Back contains several rare plant species and by your admission there are no resource conflicts. Please set this land aside as wilderness. Adobe Badlands are another area which have a pristine area beauty and view. Also Beaver-Creek, one of the lower ^{levation} canyons allows year round recreation so that people can enjoy the beauty which has made the west famous.

With only 4% of Colorado left pristine it seems a mistake to go any further in Endangering our heritage and the environments we depend on.

Thank you for recommending Gunnison Gorge, I hope you can do the same with the other areas I've mentioned with a little further consideration and thoughts towards future generations.

Thank you for your time.

Sincerely,

Margaret

1007 MARION ST. #2
DENVER CO. 80202

To: Gene Vecchia
RMP Team Leader
BLM
2505 S. Townsend Ave
Montrose, CO 81401

Dear Gene,

I would first like to voice my approval for the recommendation given by the BLM for wilderness protection in the Gunnison Gorge.

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The Camel Back and Adobe Badlands are wilderness study areas which I feel have much to recommend them also very little land in these lower elevations is protected by wilderness status even though these areas have a variety of plant and wildlife species not found in the high altitude areas. There are no resource conflicts or special interests in these areas however their wilderness qualities will be probably destroyed without full protection. The areas being considered are such a small percentage of BLM land that as much as possible should be set aside now.

Cordially
Suj. Clerk
Bj. Clark

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Mr. Vecchia,

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Thank you for recommending Gunnison Gorge for Wilderness. This was quite appropriate. However, in the DEIS there were no resource listed for recommending the Adobe Badlands and Camel Back for Wilderness. Indeed, the DEIS read like an argument for such designation. You can't even give implicit interest in the area. Also, there are many, many alternative uses for ORV. My friends and I will never swing ORV facilities do not want to take any legal action and hope that my tracks have been carefully inspected for this use. These recommendations Camel Back and Adobe Badlands for Wilderness Designation.

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In addition, the development of Storm King Mountain for skiing would be catastrophic for all above. This is an extremely important issue. Nothing more than reasons shown exist over enough to support a ski area, even with existing development would prove irreversibly damaging to these other Wildlife is an important part of the maintaining the beauty of Colorado.

Thank You,

1407 Hasfield
113 MARION ST
Boulder Co. 80302

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Dear Gene Vecchia,

First of all I would like to thank you (BLM) for recommending all 21,028 acres of the Gunnison Gorge wilderness Study Area for its wilderness protection.

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I would like to ask you and the BLM to recommend the Camel Back and the Adobe Badlands for wilderness designation. These areas have no timber or mineral conflicts, so all the more reason not to develop but to protect these areas, wilderness areas. Also manage Storm King Mountain for elk and not ski area developers.
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Thank you

Scott Robinson

105

Date:

Robert E. Veochia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Veochia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

- 86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Signed *Ray W. Gopher*
10/24/87

Date:

Robert E. Veochia
RMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Veochia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement:

66 I do (do not) agree with the BLM's Proposed action, the All Wilderness Alternative, for the Gannon George Wilderness Study Area.

- 68 The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
- 136 Site-specific objectives can be stipulated through the Allotment Management Plans.

Signed *Ray W. Gopher*
10/24/87

Mr. Gene Veochia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO, 81401

October 23, 1987

Dear Mr. Veochia,

I was very pleased to see that the BLM has recommended the Gannon George WSA as wilderness in the Uncompaggre Basin RMP. The area is quite beautiful, and the Gannon river running through it, makes it a very unique area.

Unfortunately, you neglected to recommend two other fine areas, with all the characteristics established in the 1968 Wilderness Act, as identifying wilderness. Camel Back WSA and Adobe Badlands.

- 136 Camel Back WSA consists wonderful, colorful sandstone formations, on the NE side of the Uncompaggre Plateau. It seems like quite an oversight not to have as of yet, recommended any area of one of the major landforms in the State! Several species of endangered plants exist in Camel Back WSA, as well as big game herds. I certainly hope the BLM will reconsider the non-wilderness recommendation for Camel Back especially in light of the fact that no major conflict with a wilderness designation exists.

- 68 I was also sorry to see the Adobe Badlands not recommended for wilderness. It is home to the endangered cactus Units Basin, and provides a great view of the river valley and the San Juan Mountains. It appears to have a low potential for oil or gas, and no timber conflicts whatsoever. I could not find a good rationale in the RMP for not designating the area wilderness.

I hope that the BLM will have the foresight to see that our unique qualities of wilderness in our beautiful state will be the mainstay of Colorado's future economy, as more and more of North America is developed, and Colorado is heaven to escape back to the wilderness.

Sincerely,

Laurel Fryer
Laurel Fryer
2212 Mapleton Rd.
Boulder, CO, 80502

THIS IS YOUR COPY FILE
NUMBER, 00

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| RECEIVED | OCT 30 1987 | BING |
| MONROE | | 604-31-97 |
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Dear BLM,

A FRIEND JUST INFORMED

CAMEL BACK AND ADOBE BADLANDS WSAS WERE NOT RECOMMENDED FOR WILDERNESS DESIGNATION.

68 I AM FAMILIAR WITH BOTH AREAS (REMEMBER RECORDING AN ARCHAEOLOGICAL SITE IN THE BADLANDS AREA THAT DATED TO PALEO INDIAN TIMES -- OVER 5,000 YEARS OLD! THAT AREA IS SO UNIQUE - FEELS SORT OF LIKE THE OLDVALE! SOBIE OF WESTERN COLORADO!) AND FAIL TO UNDERSTAND THE REASONING BEHIND DROPPING THESE AREAS. I DON'T REMEMBER THOSE BEING ANY PARTICULARLY SUCCESSFUL OIL OR GAS WELLS BEING DRILLED IN EITHER AREA. PLEASE RECONSIDER YOUR DECISION.

I'D LIKE TO THANK YOU FOR RECOMMENDING THE GANNON GEORGE W.S.A; ALL OF US WHO LOVE THE GANNON RIVER AND THE INCREDIBLE CANYONS IT FLOWS THROUGH (INCLUDING US FISHERMEN) APPRECIATE YOUR DECISION. THANK YOU!

Sincerely,
Smith M. [Signature]

October 27, 1987

From: Dave Hamzler
Box 531
LaVeta, Co. 80557

TO: MR. Gene Vecchia
RAMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
MOUNT RAIN, CO. 81401

Dear MR. Vecchia,
This letter thanking the Bureau of Land Management for recommending the Gunnison Gorge Wilderness Study Area for wilderness protection. It would be a beautiful addition to the BLM's Company of the Gunnison.

Would the Bureau of Land Management also take under consideration Camel Back and Adobe Bed lands for protection under wilderness also? We need more area for protection (by mile) and enjoyment in a natural state. A Day hike in these areas will touch the soul of an individual to feel apart of a true earth reaction.

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page 2 -
please try to finish the analysis and put this on the two areas under protection. We must read them in the future.

O.K., not so small other matter, the Kary site area site, as you know the LaVeta, Cochran Area has a site Area of its own on forest land. I protected this Area as did the stream Kary Area for the sake of elk or being, would like the elk as we always allow in this area, the State Forest fertilized the area Mt. Range the spring by helicopter to encourage the timber to grow and the elk to come back, this will not happen and the State is unhappy about lost Revenue from hunting.

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And other side spot, due to the drop in prices, the site area went back up and is now operated by F.D.C. Now site management is looking for some poor soul to take a beating to let it rest, with the big boys of land swaps with the Forest Service in order to build more roads. Developers are having fun with the state, not to be in the site business.

We need areas wilderness so I am continuing to live in Colorado, my home state.

128

page

Thank you MR. Vecchia for your time and I do hope and pray that a solution to get B.L.M. land for wilderness can be found.

Sincerely,
Dave Hamzler
Box 531
LaVeta, Co. 80557
303-742-3641

129

HENRY G. WRIGHT
ATTORNEY AT LAW
1811 MAIN AVENUE
PO BOX 813
DURANGO COLORADO 81302
(303) 281-3388

October 29 1987

Robert Vecchia
BLM
2505 S. Townsend Ave.
Montrose CO 81401

Dear Robert:

I wish to comment upon the RMP recently issued by your office. I personally have visited the lands covered by the RMP on a very regular basis, and have also visited each of the USAs a number of times as well.

I would urge the BLM to reconsider its preferred alternative so as to more closely follow the Conservation Alternative. The negative impact of grazing is just to severe for the arid and semi-arid land to handle. The results of overgrazing are all too clear in a number of places in the area. I am especially concerned about the proposed land treatment as such "treatment" has a severe impact upon the natural vegetation and is of limited value so far as actually increasing forage.

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So far as the USAs are concerned, the BLM is to be congratulated upon its All Wilderness proposal for the Gunnison Gorge. However, the BLM should also include both the Camel Back and Adobe Bedlands area as wilderness. It would appear from the reports that wilderness designation would not in any way influence either grazing or mineral extraction. Both areas offer pristine country which should be preserved. The Camel Back area offers one of the last undisturbed areas of the Uncompahgre Plateau while the Adobe Hills area offers a great expanse of Mancos Shale which provides numerous opportunities for solitude.

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Thank you for considering my comments. Please keep me in touch as to your final decision.

Sincerely,

Henry G. Wright
Henry G. Wright
Attorney at Law

HGW/ps

Date:

Robert E. Vecchia
RMP Team Leader - RM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement I (to) ~~Agrees~~ agree with the RMA's Proposed Action, the All Wilderness Alternative, for the Guntion Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

John T. ...

Signed

Date:

Robert E. Vecchia
RMP Team Leader - RM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

*With also is the to
say? the share
says it all*

*John T. ...
Parrish*

Signed

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5555 East Yale, Apt. 3
Denver, Colorado 80222
October 31, 1987

Robert E. Vecchia, RMP Team Leader
Bureau of Land Management
Uncompaggre Basin Resource Area
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia:

During the past several weeks, I have had the opportunity of reviewing the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement. I appreciate the opportunity provided to make written comments concerning it.

I am pleased that the Guntion Gorge MRA is recommended as suitable for wilderness designation in the Preferred Alternative. The Camel Back MRA and the Adobe Badlands MRA should also be so designated. I could find no convincing argument presented for not doing so. There is a great need for preserving wilderness areas in our great country and every effort should be made to do so while the opportunity remains.

The designations for Escalante Canyon and for Fairview should be for the greatest possible protection of the endangered, threatened, candidate, and sensitive plant and animal species and for the unique plant associations found there. Careful and adequate monitoring must be maintained to insure that these species are indeed protected.

I would favor the maximum closed and limited use designations for ORV use which would give the most protection for endangered, threatened, candidate, and sensitive plant species. I would hope that this issue is given careful consideration before the Final Plan is adopted.

The Conservation Alternative seems to present a more acceptable land tenure adjustment with no public lands being considered for disposal and for pursuing acquisition of some private lands. It should not be necessary to lose habitat for endangered, threatened, candidate, and sensitive plant species by disposing of those lands.

Every possible means should be taken to protect the cultural and paleontological resources in the planning area. These are resources that are invaluable and once destroyed are lost to scientific study forever.

Thank you again for this opportunity to make comments.

Sincerely,

Eleanor Von Burgen
Eleanor Von Burgen

Rodney Wilson
214 N. Washington
Cortez, CO 81321
November 2, 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave
Montrose, CO 81401

Dear Mr. Vecchia:

I'm writing to express my appreciation for the BLM's decision to recommend Guntion Gorge for wilderness protection. The great fishing and beautiful scenery of this area should rightly be preserved as a wilderness area. While this action by the BLM warrants my appreciation, I would like to express my regrets at your omission of recommendations for Camel Back and Adobe Badlands.

Camel Back, as one of the few remaining potential wilderness areas on the Uncompaggre Plateau, deserves your recommendation for wilderness designation. The endangered species of plants which exist in the area would benefit from wilderness designation, as would the big game population. As there are no timber or mineral conflicts to interfere with the designation, please reconsider your recommendation.

The Adobe Badlands, with its beautiful views of the San Juan Mountains and the Uncompaggre River valley, also should be recommended for wilderness designation. With a low potential for minerals and no timber, there are no obvious conflicts with a wilderness designation. I understand that you intend to close the area to off-road vehicle use so why not go one step further and recommend for wilderness protection.

One other issue in the Uncompaggre Basin RMP is the Storm King Ski Area site. Your plan says the ski area would eliminate the elk overlying habitat and impact mule deer fawning areas. Despite this, the BLM intends to let developers proceed with the ski area during a 5 year grace period. Please do not destroy this area for the sake of some private developers. Wilderness and wildlife are shrinking resources that must be preserved.

I realize that you must consider many conflicting interests in making your recommendation but please reconsider recommending Camel Back and Adobe Badlands as wilderness areas and stopping the destruction of an elk overlying habitat.

Sincerely yours,

Rodney Wilson
Rodney Wilson

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Dear Mr. Vecchia,

As a representative of the Bureau I address my comments to you.

I am very appreciative of the Bureau's wilderness protection recommendation of the Hensonson George area. The fact that you and I live in such beautiful country makes this recommendation a very important sign of common interest, thank you for your help in this work.

The Camel back country, as well as the Adobe Badlands also need your wilderness support. The information contained in the draft Uncompahgre Basin RMP leads me to the conclusion that these areas had no competition from timber/mineral interests. The question then, is why doesn't BLM recommend wilderness designation for Camel Back and Adobe Badlands? The Uncompahgre Plateau will continue to be ruined unless you support at least one spot, the Camel Back, for wilderness protection.

Please take my comments into serious consideration. I think our future together on the Western slope depends on us working together.

Thanks

Ratrock Prockery (98 FARMWAY OR
GUNNISON, CO 81230)

Robert S. Vecchia
c/o Jean Leach
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Johnson Ave.
Montrose, CO 81401

Sir,
I have reviewed the draft Uncompahgre Basin Resource Management Plan and Environmental Impact Statement, and the Wilderness Technical Supplement. I commend you for your fine efforts.

Although there appear to be no major resource conflicts with the designation of the Camel Back wilderness study area as wilderness, I could not find in the above documents the rationale for your not recommending the area as suitable for wilderness. I would request that this issue be addressed in the final Environmental Impact Statement.

I visited the Camel Back area and surrounding region in July of 1986, and was impressed with the rugged landscape and opportunities for solitude. It is an excellent area for wilderness day hiking in a canyon country setting, all the more enjoyable since it is close to populated areas and is easily accessible.

I believe that the Camel Back area is suitable for wilderness designation, and encourage you to reexamine this issue.

Thank you for the opportunity to comment.

Sincerely,
Michael S. Frazee
Richard S. Frazee

Date: 11-2-87

139

Robert S. Vecchia
305 Team Leader - BLM
2505 South Johnson Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gaudin George Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Area will benefit most from the wilderness alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be attained through the Allotment Management Plans.

We do not need any more land put under fire for a so-called "conservation" to take over and try to keep the people who really love our open spaces off from it.

People who spend any time out there know that the people who want all wilderness over are the ones who pack trash in and leave it behind & outgrow the ones who pack the trash out.

Signed: KAC Denton

Shirley Denton

140

Date: 11-2-87

Robert S. Vecchia
305 Team Leader - BLM
2505 South Johnson Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest settlements to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and sediment, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Having been in the guiding business most of my life, and around cattle people all my life, the only way to maintain the land for the most profitable for all concerned is to maintain the current management for grazing, wildlife habitat, mineral and forest products and to enhance the recreation of such lands by keeping their interest management intact.

Signed: KAC Denton
Shirley Denton

Date: Nov. 3, 1987

141

Robert E. Vecchia
RIP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Users getting together with each other and with management can better understand each others problems and so can better work out solutions for these problems. This is the ~~best~~ democratic way to do or work out problems that relate to all.

Signed: Melvin K Beach
430-1550 Rd.,
Dalton, Colo.

Date: Nov. 3, 1987

142

Robert E. Vecchia
RIP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement: I (we) do not agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Guntion Gorge Wilderness Study Area.

The Daniel Jack and Adobe Balllands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

More users, including recreational users can use and enjoy these areas if they are not in the all Wilderness Alternative.

Signed: Melvin K Beach
430-1550 Rd.,
Dalton, Colo.

143

Date:

Robert E. Vecchia
RIP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement: I (we) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Guntion Gorge Wilderness Study Area.

The Daniel Jack and Adobe Balllands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

Myke Standish Box 248 Olathe Colo 81425
David Hubbard Box 206 Olathe, Colo 81425
Lynn Hubbard Box 161 Olathe, CO 81425
Greg Standish Box 248 Olathe 81425

Signed:

144

Date:

Robert E. Vecchia
RIP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Myke Standish Box 248 Olathe Colo 81425
David Hubbard Box 206 Olathe, Colo 81425
Lynn Hubbard Box 161 Olathe, CO 81425
Greg Standish Box 248 Olathe 81425

Signed:

Robert E. Vecchia
RPO Team Leader - RM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Unscopagere Basin Wilderness Technical Supplement:

- 66 I (do not) agree with the RM's Proposed Action, the All Wilderness Alternative, for the Dunsmen Gorge Wilderness Study Area.
- 68 The Canal Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
- 136 Site-specific objectives can be mitigated through the Allotment Management Plans.

Michael Goodman *Albino, Co*
Jim F. Engel *Montrose, CO*
Nick Williams *Shoofoot, Co.*
James Davis *Albino, CO*
Tom Jones *01/27/81 on*
Rick Jans *Olafhe Co.*
Paul Smith *Montrose, Co.*
Alvin Rodman *Albino, Co*
Fred J. Edwards *Clatsop*
Rick Ross *Clatsop*
James Lewis *Olathe Co.*
Siemens *Delta Colo*
Gary Sanders *Delta Colo*
W. B. Johnson *Delta Colo*

Signed: *Bill Campbell*

Robert E. Vecchia
RPO Team Leader - RM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Unscopagere Basin Resource Management Plan and Environmental Impact Statement:

- 66 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the "Continuation of Current Management."
- 86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Michael Goodman *Albino, Co*
Jim F. Engel *Montrose, CO*
Nick Williams *Shoofoot, Co.*
James Davis *Albino, CO*
Tom Jones *Olafhe Co*
Rick Jans *Olafhe Co*
Paul Smith *Montrose, Co.*
Alvin Rodman *Albino, Co*
Fred J. Edwards *Delta Colo*
Rick Ross *Delta Colo*
James Lewis *Delta Colo*
Siemens *Delta Colo*
Gary Sanders *Delta Colo*
W. B. Johnson *Delta Colo*

Signed: *Frank & Betty Engel*

Date: *November 3, 1987*

Bill Campbell
8100 - 25 Street
Delta, Colorado

Robert E. Vecchia
RPO Team Leader - RM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Unscopagere Basin Wilderness Technical Supplement:

- 66 I (do not) agree with the RM's Proposed Action, the All Wilderness Alternative, for the Dunsmen Gorge Wilderness Study Area.
- 68 The Canal Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
- 136 Site-specific objectives can be mitigated through the Allotment Management Plans.

If the doe were to burn wilderness, it would in some cases adversely affect the grazing ability on certain allotments. Most small livestock producers will not be able to operate if their cattle numbers are reduced. Our national food supply of beef would depend upon the wise decisions made now.

The alternatives are best suited for "no wilderness" of the Canal Back and Adobe Badlands. We are truly concerned about the Area's quality of life and the economy now and in the future.

Signed: *Bill Campbell*

Robert E. Vecchia
RPO Team Leader - RM
2305 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Unscopagere Basin Resource Management Plan and Environmental Impact Statement:

- 66 The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the "Continuation of Current Management."
- 86 Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

We would like to submit our comments on the Unscopagere Basin RMP/IS. As the wilderness technical supplement. First of all, we would like to commend you on the job you have done. It took a lot of research and study and hard work to put these documents together and I hope it will be understandable to those who read it.

Basically, we are opposed to the Canal Back area being Wilderness and feel the 35% allotment in the riparian areas would hinder an allotment of the entire permit. The riparian areas are our primary source of stock water for our BLM permit and if we couldn't use those areas for water, we couldn't use the riparian areas as well. We would need additional water sources, and as wilderness, we would be unable to get those qualities. The Wilderness Study Area would be a good idea to get those qualities. The Wilderness Study Area would be a good idea to get those qualities. The Wilderness Study Area would be a good idea to get those qualities.

Thank you for your cooperation and helping to make it all.

Signed: *Frank & Betty Engel*

Date:

Robert E. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement:

I do (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Guntion Gorge Wilderness Study Area.

68 The Camel Back and Adobe Ballands Wilderness Study Areas will benefit most from the
136 No Wilderness Alternative. This alternative best exemplifies the multiple-use management.
Site-specific objectives can be mitigated through the Allotment Management Plans.

Signed: *Shirley & Larry Boyd*

Date:

Robert E. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaggre Basin Wilderness Technical Supplement:

66 I do not (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Guntion Gorge Wilderness Study Area.

The Camel Back and Adobe Ballands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

68 Please do not put the "Camel Back" into
136 the All Wilderness Alternative. We feel its use would not be in the best interest of those involved. We do not think it would ever be appreciated for anything more than the current use.

Signed:

*Margene Oswald - 625 Puffy Way - Springfield, CO 80902
Lorelei Oswald - 625 Puffy Way - Springfield, CO 80902*

Date:

Robert E. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaggre Basin Resource Management Plan and Environmental Impact Statement:

86 The best alternative offered to support the multiple-use objective, with the fewest setbacks to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

*Please enter my support of the "Continuation of Current Management," concerning the Uncompaggre Basin Resource Management. We feel this land should definitely be left to multiple-use.
Thank you*

Signed:

*Margene Oswald - 625 Puffy Way - Springfield, Co. 80902
Lorelei Oswald - 625 Puffy Way - Springfield, Co. 80902*

1740-2725 Road
Celesteville, CO 81413
November 2, 1987

Robert E. Vecchia
BMP Team Leader - BLM
2505 South Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia,

In the absence of what I view to be compelling argument for substantial change, I favor a continuation of the present management of land under BLM control; I favor the "Continuation of Current Management" alternative.

Comments about the specific land uses addressed:

121 Marion Jones - I do not see in the "Plan" sufficient documentation presented to justify elimination of 2500 acres from livestock use. I understand that in one instance this action will create particular hardship for one ranching operation. I do not believe that this should be done without strong evidence of the need for such action.

66 Wilderness Designation - Based on the arguments I have
68 heard and read, I do not find sufficient reason for a
136 change in status of any of the three proposed areas.

Access - For those of us who own land and operate in the vicinity of the BLM lands, the idea of establishing public egress roads is a real concern. Our experiences have shown that an access is treated by especially the hunting and wood cutting public as license to use any of the lands they cross. I doubt that the BLM envisions a sufficient increase in staff to police such egresses which again leaves the very painful task to the individual landowner. As a concept, I oppose access roads without the appropriate controls; in the event of a decision to create such accesses, I would hope that they will be selected so as to create a minimum of hardship to landowners.

Thankyou for the opportunity to comment on your proposals.

Sincerely,

Harry B. Vaughn
Harry B. Vaughn

2184 Stonehenge Circle
Lafayette, Colorado 80026
Nov. 1, 1987

Dear Sirs:

We are writing to inform you of our support in protecting the following Colorado Desert Wilderness Areas currently under consideration.

We thank you for recommending all 21,038 acres of the Gunnison Gorge Wilderness Area for protection. This land is prime wilderness and is used in with both the Black Canyon and Gunnison River which are so important for preservation.

On the Camel Back area of the Uncompaghe Plateau, we want an explanation to your approach on managing this wilderness resource. By your own admission, there are no resource conflicts in regards to wilderness designation. We strongly feel that the BLM should support Wilderness Designation for this area as none of this Uncompaghe Plateau has a single acre of wilderness as yet.

As far as the Adobe Badlands are concerned, we appreciate your decision to close the area to off-road vehicle use. We realize that there is virtually no resource to utilize here, so we see no conflict in declaring wilderness designation for this area.

And one more thing; even though we are avid skiers, we do not support the potential Storm King Ski Area site. As it is critical elk calving habitat and would impact deer terrain, we well the fact that there are more than enough ski areas in all parts of the State of Colorado, we implore that the BLM manage Storm King Mountain for elk and not ski developers.

Thank you for your time.

Sincerely,

Laura & Ray Wynfield
Laura & Ray Wynfield

Date: *Nov. 4-1987*

Robert E. Vecchia
RFP Team Leader - BLM
2905 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompaghe Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the fewest detrimental to livestock grazing, is the "Continuation of Current Management."

Under this policy, through Allocation Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

Date: *Nov. 4-1987*

Robert E. Vecchia
RFP Team Leader - BLM
2905 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompaghe Basin Wilderness Technical Supplement:

I (strongly) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This Alternative best exemplifies the multiple-use management.

Site-specific objectives can be stipulated through the Allocation Management Plans.

701 650 Road
Delta, Colorado 81416
November 1, 1987

Mr. Robert E. Vecchia, RFP Leader
Bureau of Land Management
2905 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

The personnel in the Montrose office of the BLM have spent considerable time and effort on the BLM's RFP/ISS for the Uncompaghe Basin Resource area and I want to commend them for the quality of the document. It is too bad that only a comparatively small number of the citizens of the United States, out of whom have never seen this area, have demanded this study which required a great deal of time and money that could have been used for some worthwhile endeavor.

I think the study team for making the right decision on the Camel Back WSA and the Adobe Badlands WSA. We already have too many of these areas set aside, and we are over a hundred years too late to have real wilderness areas. So far as the Gunnison Gorge is concerned, it is already too well advertised to be of any value as so called wilderness. However, it seems unnecessary to reduce the livestock grazing in these areas that are showing improvement under present grazing conditions.

Throughout the draft RFP/ISS, the riparian zones are to be "limited to 35 percent utilization of key forage species and eliminated from reach." through Ray J's, for livestock grazing. Why not use the lower elevation stream areas in the spring when livestock use would impinge the willow along the stream banks? Anytime a stream in a desert area is excluded from livestock use, the riparian zone will deteriorate. If livestock are excluded from any area, the big game will move out of that area area. The two agencies seem to read each other.

As far as putting a percentage of use on so called "key species", I challenge this also. There is no such thing as a "key species". This is just a cliché used by some to make an impression on the layman. No plant species is more of a key than in any other species. As far as percentage of utilization, this is another thing that is very questionable. It would be more practical to classify use as light, moderate or heavy. This makes more sense since no one knows what 100 percent vegetation by weight was, or is, in any given acre before any grazing occurs.

In the more than 50 years since the passage of the Taylor Grazing Act, there has generally been a continual reduction of livestock numbers over the whole area of the Uncompaghe Basin Resource Area. If by proposed management, we set forth in this RFP/ISS, we are going to see as much improvement, then the real reduction of livestock use has been to no avail. Why not change and get out of the "reduction rut" and try something such as the Helianthus Resource Management. This is being proven to be advantageous in other areas.

BTW:

Laura J. Orth - 6515-5300 Rd. Delta, Colo. 81425
Thomas D Orth - 6515-5300 Road - Delta, Colo.
Laura J. Orth - P.O. Box 27, Delta, Colo. 81425

Robert E. Vecchia
202 Tamm Leader - BLM
2205 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Thompsons Basin Wilderness Technical Supplement, I (do) (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Cannon Gorge Wilderness Study Area.

The Camel Back and Adobe Badlands Wilderness Study Areas will benefit most from the Wilderness Alternative. This alternative best exemplifies the multiple-use management. Site-specific objectives can be mitigated through the Allotment Management Plans.

We ~~are~~ feel that the land is for everyone's use and that stock and wildlife can get along together and a wilderness areas grow up with out anything to eat it and could be had if a fence got started and you couldn't use fire fighting equipment if they don't take a anti into it. ~~It~~ would hike to see people take care of our forest and the wildlife and plants but we think that all people should have access to all forest. The elders can walk or hike across to see all this ~~best~~ beauty.

Signed:

De Jungst
Helen Jungst

4700 Ventura Lane
Fort Collins CO 80525
November 1, 1987

Mr. Robert Vecchia, BLM Team Leader
Bureau of Land Management
Thompson Basin Resource Area
2205 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

This letter provides my comments on the Draft Resource Management Plan (RMP) for the Thompsons Basin Resource Area. I have made many visits to locations within this Resource Area, and am familiar with the beauty and resources it encompasses.

The Preferred Alternative of the RMP is inadequate in its attention to the historical resources of the Resource Area. Although I support the Mesquite Canyon ACHC and Fairview BSA, these areas need focal management provisions spelled out in the RMP. Mesquite Canyon ACHC should be larger, should allow an livestock grazing, and should prohibit camping. Management intent with respect to utility corridors, roads, mineral exploration, grazing, and surface occupancy should be specifically listed for each BSA. Plant species and vegetation associations considered sensitive by the Colorado Natural Area Program should be listed for the entire Resource Area, and if appropriate, additional Special Management Areas should be proposed in the final RMP.

I oppose the proposed North Delta OBT use area as incompatible with management prescribed by the federal Endangered Species Act for listed plants. Although this area already has suffered damage, that is no excuse for BLM's abdication of its responsibility to preserve the remaining values.

Because of their destructive potential on the fragile adobe badlands, I ask that ORVs be restricted to existing roads throughout the area. The manganese-derived adobes of the Thompsons provide a specialized habitat for numerous rare plants and plant associations. It is sad that the short-term pleasure of a few is considered more vital than an irreplaceable resource.

Thank you for recommending the Cannon Gorge WSA for wilderness protection. It is a spectacular area that, under wilderness designation, will be a valuable supplement to the Cannon of the Colorado National Monument. However, nowhere in the RMP do I find sufficient justification for dropping Adobe Badlands and Camel Back WSAs from recommendation for wilderness. In view of their wilderness characteristics, I favor a favorable recommendation for both areas.

I ask that the final RMP clearly delineate the areas of riparian vegetation within the Resource Area, and list specifically the management plans for

-page 2

116 this vegetation type (as a separate unit, not fragmented, hidden, and thus lost within the "Management Unit" format). Such plans should include complete exclusion of livestock grazing from the riparian areas.

Please include my comments in the final RMP, and keep me on your mailing list for information regarding the RMP and Resource Area.

Sincerely yours,

Bruce S. Martin
Bruce S. Martin, Ph.D.

November 4, 1987

Robert E. Vecchia
Bureau of Land Management
2205 South Townsend Avenue
Montrose, CO 81401

Dear Sir:

I am in agreement that the Camel Back should continue to be managed by the BLM as it now is. I prefer the no action alternative.

For many years the Multiple Use Act has worked for the preservation of this area. The forage is harvested yearly by wildlife and livestock to help feed the hungry world. At no time have these uses interfered with recreational uses of these lands.

This area does not lend itself to wilderness. There are roads in the area and some fencing. The land is managed as it should be and the area is accessible to the general public.

I was brought up on the theory that Public Lands were for Multiple Use. With proper management, these lands will provide us with food and fiber for all time to come, but we must be allowed to properly manage livestock grazing. Fences must be kept, stock ponds properly maintained and the range properly utilized to prevent overgrazing and forest fires.

Reducing livestock grazing in the so called riparian zones would defeat the purpose of a riparian habitat. Many riparian species of vegetation are of low palatability to livestock. Streambanks in this area are unstable and water turbidity will occur in the absence of livestock use.

Many flash floods come down these canyons each year as evidenced by the rocks and sandy washes. These streams usually dry up during the summer and when flooding occurs there is no way to hold the water, rocky dry banks. Some streams are definitely too dry for vegetation and definitely does not lend itself to streambank stability.

Reduction of AUMs would defeat the purpose of a riparian zone when properly managed. Vegetation and the canyon areas has improved many times over in the few years since a riparian habitat was first introduced, even though the AUMs have remained the same. Riparian habitat properly managed should increase available forage.

Highhorn sheep should not be introduced into the area. Lack of adequate winter forage should preclude this. Private land in the area would, of necessity, have to support these animals especially in the winter months.

It would appear that livestock grazing has been given practically all the credit for increased erosion and for the destruction of habitats of big game and non game species. These statements are biased and founded without fact.

All these natural resources should be utilized thru a practical and beneficial program, not locked up for the exclusive use of hiker, back packers and the affluent few with time on their hands.

The young, too, grow old. They also will be denied access to roadless areas in their declining years when they are no longer able to walk or back pack long distances.

The need to continue Multiple Use management of all Public Lands will provide storage for wildlife and livestock, minerals for energy development and protection of watersheds, the most valuable resource of all.

The west has a wild existing right to keep these Public Lands open for all to use and enjoy. Creating wilderness areas does not preclude these lands for the enjoyment of future generations. Proper management does.

Joseph M. Gore
Joseph M. Gore
441 Hwy 348
Dulse, Colorado

- 2 -

7 Chardonnay Court
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2905 S. Townsend Avn
Montrose, CO 81401

Dear Mr. Vecchia:

I offer the following comments regarding the Uncompangre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

1. The document is generally well-written--thorough and without the usual obscurities!
2. BLM's recommendation of wilderness for the Gunnison Gorge is laudable. The gorge is geologically spectacular and offers near-round opportunities for primitive and unconfined recreation.
3. There are no resource conflicts with respect to Camel Back, yet BLM has failed to recommend any of the WSA for wilderness designation! On what was this recommendation based?
4. Adobe Badlands WSA, as described by BLM on p. 3-11, "includes the most outstanding Mancoes shale mass formations found in the planning area" and presents no resource conflicts that would preclude wilderness designation. So why was this WSA given a non-wilderness recommendation?
5. The cultural resource density within the Gunnison Gorge WSA computes at .000acre, and the potential for cultural resources is evaluated as "moderate." The cultural resource density within the Camel Back WSA computes at .010acre, and the potential for cultural resources is evaluated as "low to moderate." Please explain the justification for these evaluations and this discrepancy.
6. While a site density of .010acre may be "low" in some contexts (e.g., south-western Colorado), it is not "low" in west-central Colorado. Furthermore, I don't know which 3 percent of the Camel Back WSA has been inventoried, but I am dubious about site-frequency predictions made from such small samples. This area contains three prehistoric creeks and is topographically similar to the Dominguez and Backlands areas, both of which have proven to be extremely archaeological sensitive.
7. It is stated on p. 4-57 that "High-value cultural sites on these acres could be protected by special designations." How?

Gene Vecchia
Bureau of Land Management
p.2

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166
23 November 1987

Dear Gene Vecchia,

First I want to thank you for recommending the Gunnison Gorge area for Wilderness designation. It is very important that we preserve intact significant areas of desert ecosystems.

I do not understand why you did not recommend the Camel Back area for Wilderness protection as well. The BLM even said that there are absolutely no resource conflicts with wilderness designation of the area. The Uncompangre Plateau is one of Colorado's major landforms, yet none of it is protected as Wilderness. I would like to know why. There are several endangered plant species in the area and big game herds that would benefit from wilderness protection.

I also want to know why you have chosen not to recommend the Adobe Badlands for Wilderness designation. Obviously there are no trees there for the timber industry, and the four dry oil and gas well provide the low potential for mineral development. There are no significant conflicts for wilderness designation.

Please manage Storm King Mountain for elk. There are more than enough ski areas (and I am a skier) in Colorado, and wildlife habitat is an ever-diminishing resource. The BLM says that the ski development would totally eliminate the elk calving grounds as well as impact mule deer farming areas. The plan to give the developers a five year "grace period" in which they may proceed with the ski area is ludicrous. After five years of working on the resort, it will be very convenient for you to allow them to continue since they will have put so much money into it. This sounds like a roundabout way to avoid dealing with an issue that needs to be confronted and dealt with now, while we still have undisturbed ecosystems left.

Please don't be afraid to take a stand in favor of protecting the wide-open spaces that make the American West what it is. I would appreciate your response to these issues.

Sincerely,

Susan Detweiler
Susan Detweiler
64 Willard
Boulder, CO 80310

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

Dear Mr. Vecchia:

I would like to make the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

I would like to make the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Technical Supplement.

1. I support BLM's recommendation for wilderness designation for the Gunnison Gorge and I am in favor of similar designations for the Adobe Badlands and Camel Back WSA's. Why, if there are no resource conflicts, has BLM not recommended them for wilderness?

1. I support BLM's recommendation for wilderness designation for the Gunnison Gorge. However, I am also in favor of similar designations for the Adobe Badlands and Camel Back WSA's, as this region of Colorado has very few wilderness areas that are accessible during any season but late spring/summer. There are no resource conflicts with respect to Adobe Badlands or Camel Back, why has BLM not recommended them for wilderness?

2. The Storm King Ski Area is unnecessary, Colorado has enough ski areas, most of which are constantly complaining about their financial struggles.

2. Please explain why the BLM considers the potential for cultural resources in the Camel Back WSA "low to moderate."

Thank you!

3. How would high-value cultural sites be protected by "special designations"?

Sincerely,

4. The Storm King Ski Area is unnecessary, I urge you to disallow the developers from proceeding with any further plans during the 5-year grace period.

Bella Corner

Bella Corner

Thank you for considering my comments.

Sincerely,

Carl E. Corner

Carl E. Corner

4784 Ventura Lane
Ft. Collins, CO 80525
November 2, 1987

Mr. Robert Vecchia, RMP Team Leader
BLM, Uncompahgre Resource Area
2585 South Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia,

I wish to comment on the Draft Resource Management Plan for the Uncompahgre Resource Area.

Please recommend both Adobe Badlands and Camel Back WSAs for potential designation as wilderness. The DMRP gives no good reasons why each of these areas should not be recommended, and clearly describes the loss of wilderness characteristics that will occur if they are not so designated. It makes no attempt to allow the few remaining areas still having such characteristics to be degraded. I support the recommendation of Gunnison Gorge for wilderness status, but urge you to include the other two areas.

I ask that the final RMP more clearly list areas of riparian vegetation in the Resource Area, and that highly specific, stringent management provisions be stated for their recovery and continued existence. Among these provisions should be the total exclusion of grazing, which is incompatible with the maintenance of native species in these areas.

I strongly oppose the draft RMP's plans to allow destruction of federally listed plants. Please modify the final Plan to respect the intent of the Endangered Species Act, and to provide full protection for listed species. The final RMP also should state clearly that no land containing listed species will be considered for exchange or disposal.

Please look closely at the draft RMP's extreme imbalance between resource use and resource destruction, caused by proposing virtually unlimited ORV use. Although negative impacts are vastly understated, the DMRP section on Preferred Alternative Impacts nevertheless provides a lengthy list of long-term or irreversible effects due to the proposed ORV provisions. Far more than just 6% of the land in the Resource Area should be permanently closed to ORVs to protect air, water, land, plant and animal resources, and opportunity for non-motorized pleasure and recreation. Please consider the potential effects increased ORV use may have in every Management Unit outlined, and exclude such use from appropriate Units.

Thank you for the opportunity to comment on the draft RMP. Please keep me on your mailing list.

Sincerely,

M. P. Steinhaus

Marna P. Steinhaus, Ph.D.

To whom it may concern;

First and foremost I would like to congratulate you for recommending Gunnison Gorge Wilderness study area for wilderness protection. But, unfortunately, I am displeased over your decision not to allow not recommending Camel back canyon and the Adobe Badlands. Please reconsider your decision, several endangered species exist in this area. There are many other environmental issues in this area that you must reconsider. Please do so!

*Gene E. Corner
600 3rd Street West
Boulder, CO 80510*

1045 E. 4th Avenue
Durango, CO 81301
November 9, 1987

Gene Vecchis
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchis:

I am writing you to express my support for additional wilderness recommendations by the BLM in the Uncompahgre Basin Resource Management Plan.

I'd like to thank you for recommending wilderness designation for the Gunnison Gorge WSA in the draft RMP. As I'm certain you know, this area contains a significant diversity of recreational and scenic resources worthy of preservation.

There are two additional WSAs, Adobe Badlands and Camel Back, that I believe deserve wilderness designation and should receive BLM recommendations for such designation in the final RMP.

There are few landforms more obviously meeting wilderness criteria than the Mancos shale badlands typified by the Adobe Badlands WSA. Although this area has relatively easy access, little interest has been shown in extractive development. With no resource conflict and management plans expressed in the draft RMP to close the area to off-road-vehicle use, wilderness designation is an obvious and proper route for preservation of the area.

Likevise, there are no resource conflicts in the Camel Back WSA. As one of the few remaining areas of true wilderness on the Uncompahgre Plateau, this area merits protection as a component of the National Wilderness Preservation System. A majestic canyon system with a personal stream, Camel Back can provide a remote recreational experience for the backcountry hiker, and wilderness designation would provide protection for fragile riparian habitat and rare plant species in the unit.

I urge you to reconsider your position on Adobe Badlands and Camel Back and recommend those areas, in addition to the Gunnison Gorge, for wilderness designation.

Sincerely,

Levis McCoy

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Oct 30, 1987

Dear Mr. Vecchis,

I just wanted to let you know that you have recommended (through) design of wilderness protection. Although I am disappointed you have recommended only the above for Camel Back and Adobe Badlands. Camel Back's 10,425 acres of wilderness propose no vehicles, and it features important, unique trees, wet meadows, creek and Uncompahgre Plateau, and this area also is the more several endangered species of plants. Also, the 10,425 acres of wilderness in the Adobe Badlands contain the beautiful San Juan Woodpecker and the Uncompahgre King Vulture and home of endangered condors. All of this land deserves to be designated as protected wilderness and I hope BLM reviews its decision on Camel Back and Adobe Badlands.

Thank you for your time,

Steve J. Hesper

1619 MAIN ST. #1
DURANGO, CO 81302

November 20th, 1987

Dear Mr. Vecchis:

First, let me state that this letter is not intended respectfully for my head is aching from my attempt at deciphering the Uncompahgre Basin RMP. But I do have a few comments and questions.

① Wilderness / OEV's - talked about steered management. Why is it so tough to designate 9% of your planning area as wilderness? Is this your idea of a compromise? The fact that out of your entire planning area, only 3 units emerged was the compromise - don't throw any more wild land to the OEV's, etc. I hardly consider the policy (in the preferred alt.) of allowing OEV's open access to 32% of the planning area a wise management - they destroy everything they come into contact with. Give other recreationists a break from these noisy, pollution belching monsters.

② Why do you refer to changing a wildlife habitat management? (p 434) The wildlife was doing fine before we came along; coexisting with the porcupine-jumper, you might say. If the areas you plan on changing were suited for grass, it would be growing there already.

③ Land Disposal - Did I miss something? Why? Why? Why? Some of the tracts you have marked for disposal are of considerable size, so management difficulties can't explain it all. At one point you state that the BLM will be disposing of 10,000 acres of crucial winter range for

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deer and elk, and that this will have a negative impact on these animals. Then you state that you will be acquiring crucial deer and elk winter range to increase habitat (p 4-53). This is just one example that I hope illustrates the reason for my confusion over your land policy. Once again, what for?

In summary, I would like to see more emphasis on protection of our land & its living components. Also, what's the balance about a ski area?

Sincerely,
Kathy Harbo
Box #241
Boulder CO 80306

RESPONSES TO PUBLIC COMMENTS

Table 3 presents the BLM's responses to comments submitted during the public comment period. The response numbers correspond to the numbers on the margins of the hearing transcripts and comment letters. The commenter or letter numbers correspond to the numbers on the upper right corner of each page of the hearing transcripts and comment letters and identify the individual commenter (see Table 1 and Table 2).

Responses are arranged by resource or resource use. Responses explain why a particular issue was or was not addressed, clarify the BLM's position on some issues, state whether a text change was made, and refer the reader to applicable sections of this document or the Draft RMP/EIS. The responses must be read in conjunction with the appropriate comments.

Table 3
RESPONSES TO PUBLIC COMMENTS

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|--|
| AIR QUALITY | | |
| 58 | 31 | There is a pervasive misconception that recommendation and designation of new wilderness areas is automatically tied to restrictive federal Prevention of Significant Deterioration (PSD) Class I air quality status. There is no such connection. Certain existing national parks and wilderness areas were designated as mandatory Class I areas by Congress in the 1977 Clean Air Act Amendments, but since then each state is and has been responsible for any redesignation. Since 1977, several areas in Colorado have been designated as wilderness but none have been redesignated as PSD Class I. The state of Colorado identifies air quality areas as Category I, II, and III; the sulfur dioxide limitations in the state categories are identical to those established for federal PSD Class I, II, and III areas. In 1977, the Gunnison Gorge Recreation Area was designated a Colorado Category I area; it remains a federal PSD Class II area. |
| COAL | | |
| 31 | 16, L-21 | The development of thresholds was considered as required by 43 CFR 1610.4-4(i); however, since all of the coal in this area is to be extracted using underground mining methods and since mitigation has been built into the management prescriptions and no major adverse impacts are anticipated, the establishment of thresholds was not deemed necessary. |
| 32 | 16 | Under the Continuation of Current Management Alternative, only emergency short-term lease applications and maintenance leases would be considered. The average increases under the other alternatives allow for consideration of future long-term leasing of lands with coal potential. The land-use planning groundwork presented in this plan will enable the BLM to respond more quickly and efficiently and avoid frequent amendments to the RMP if there is a future demand for coal. It also provides industry with a variety of coal qualities with which to meet future market needs. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|---|
| 33 | 8, 16, L-21 | A summary of the application of the coal unsuitability criteria is described in Chapter One, pages 9 and 10, of the Draft RMP/EIS. As stated in the cover letter (the first page of the Draft RMP/EIS) and again on page 1-8, the coal unsuitability report is available for public review and comment. This report describes in detail the lands in the Paonia/Somerset coal planning area and a portion of the Bookcliffs coal planning area which are deemed unsuitable based on the 20 unsuitability criteria. |
| 34 | L-2 | The management of the lands around the Tomahawk Mine has been changed in the Proposed Plan. These lands are now included in Management Unit 7. (See plan map.) |
| 42 | 16, 22, H-3, L-21 | The acreages available for coal leasing consideration do not vary much between alternatives since all mining would occur underground. There were no multiple-use trade-offs or resource conflicts that prevented lands from being considered as suitable for coal leasing. |
| 45 | 16, L-21 | The final regulations regarding increased emphasis on the six criteria mentioned were not finalized until December 1987, six months after the release of the Draft RMP/EIS. These criteria were, however, analyzed in the Draft RMP/EIS. Riparian areas are protected in Management Units D-9 and D-11. The other criteria (sole source aquifers, wetlands, Class I air quality areas, and buffer zones around National Park Service areas) were not addressed because there were no impacts to them or, as in the case of reclamation, the impacts will be analyzed when a potential coal lease tract is delineated. |
| 46 | 16, L-21, M-12 | The RMP does not make any coal leasing proposals. Coal leasing levels are established by the Secretary of the Interior through the regional coal teams (43 CFR 3420.2). The RMP does analyze the four coal screens described on page 1-9 and identifies whether the coal is available for coal leasing consideration. If there is a demand for coal in the future, coal within the areas identified as available for coal leasing consideration will be analyzed on a tract-specific basis. The BLM cannot lease coal for which there is no industry interest. |
| 72 | L-21 | The coal leasing process includes a detailed site-specific analysis of potential impacts of proposed lease tracts following tract delineation. Mitigation to eliminate or lessen anticipated impacts is identified at that time. Mining or associated activities would not be permitted where it is known that ground or surface water impacts would result. The BLM recognizes, however, that some degree of risk and the occurrence of unanticipated impacts does exist. |

OIL AND GAS

| | | |
|----|--------|--|
| 8 | 17, 32 | This information is contained in the Oil and Gas Technical Report which supports the RMP and which is available for public review. By not making the Oil and Gas Technical Report a part of the RMP (i.e., an appendix), it can be updated and revised without amending the entire RMP. |
| 35 | 3 | The text on page 2-3 of the Draft RM/EIS has been changed. See the Changes to the Draft RMP/EIS section of this document. |
| 38 | 2, 9 | The effects of aquifer mixing are not discussed because of the low level of oil and gas activity. In addition, the immediate and long-term impacts on water resources are not significant because measures are taken at the drilling stage to prevent aquifer mixing and other groundwater impacts on a site-specific basis. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|---------------------------|---|
| 44 | 8 | The oil and gas resources in Management Unit D-9 would be open to leasing with standard lease terms as described on page 3-29 of the Draft RMP/EIS. In addition, a more comprehensive analysis of oil and gas activities is included in the Oil and Gas Technical Report, which is available for public review as stated in the cover letter to the Draft RMP/EIS. |
| 47 | 16, 24, L-21 | The Connors vs. Burford decision pertained to the leasing of lands in the National Forest system and not to public lands administered by the BLM. The BLM feels that a comprehensive and cumulative analysis of oil and gas activities is discussed in the RMP/EIS and also in the Oil and Gas Technical Report. As stated in the cover letter and on page 1-8 of the Draft RMP/EIS, the Oil and Gas Technical Report is available for public review. |

OTHER MINERALS

| | | |
|----|----|--|
| 36 | 9 | The statement is correct. The mineral leasing process is conducted in such a way that the risks of water injury are minimized. It is the responsibility of the lessee or claimant to mitigate any injury to an adjudicated water right. |
| 39 | 2 | Current policy does not permit mining and disposal of mineral materials in floodplains if the floodplains will be adversely affected. There is no criteria used to permit this activity on alluvial valley floors. Mining on alluvial valley floors is regulated only for coal mining, not disposal of mineral materials. If there are proposals for disposal or mining of mineral materials on alluvial valley floors, they will be analyzed on a site-specific basis to assure all impacts are mitigated. |
| 41 | 22 | Management of this area allows for low but evident human concentrations and impacts. Mineral exploration and development is not in conflict with this management guidance and does not, therefore, necessitate maintaining the existing mineral withdrawal. |
| 43 | 18 | The mineral resources (including production figures) were identified in greater detail in narrative and overlay formats in the Management Situation Analysis (MSA). As stated on page 1-8, the MSA is available for public review and comment. Information from the MSA was condensed and summarized for inclusion in the Draft RMP/EIS. As indicated in the environmental impacts section (Chapter Four) of the Draft RMP/EIS, the Preferred Alternative presented little or no impacts to mineral development, especially for high potential minerals. |

SOILS AND WATER RESOURCES

| | | |
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| 73 | 8 | When reviewing site-specific actions, the BLM will comply with state water quality standards as noted in the introduction to each alternative prescription. |
| 74 | 8 | Existing water quality standards are established by the State of Colorado, not the BLM. Information on these standards is available at the BLM's Montrose District Office. The amount of data available precluded incorporation into the RMP/EIS. The BLM does monitor water quality on public land to ensure compliance with established standards. This information is also available at the Montrose District Office. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|---|
| 75 | 8 | The BLM has a representative on the Colorado Non-Point Source Advisory Committee which is currently developing the Section 319 Assessment Report. When completed, this report will identify non-point sources on public land. The specifics of Section 319 program projects will be incorporated into BLM activity plans. Salinity and sediment, the two primary water source issues addressed in this RMP/EIS, are also discussed in the 1986 Colorado 305(b) Assessment Report. |
| 76 | 8 | Site-specific monitoring is a follow-up process for objectives identified in activity plans. As activity plans are developed, monitoring studies designed to evaluate progress in attaining specific objectives will be developed. |
| 77 | 8 | "Local surface waters" refers to the water resources within the drainage where the impact is occurring. |
| 78 | 8 | Domestic water users of water from public land were contacted during the preparation of the Draft RMP/EIS. No water quality problems, potential impacting activities, or water quality improvement needs were identified. |
| 79 | 8 | Aquatic habitat activity plans would be designed to meet or exceed the water quality standards for each particular area. |
| 80 | 8 | The assumption is that AMP objectives for increased ground cover would be met, even if adjustments to the grazing systems are required. The text in the Proposed Plan reflects this assumption. |
| 81 | 8 | The BLM administers the public land under numerous Acts, Executive Orders, Secretarial Orders, etc. The BLM feels erosion and water quality can be improved through proper management without the need for on-the-ground erosion control projects. Each of the alternatives was designed to comply with existing laws and regulations. The impacts that are identified on pages 4-44 through 4-60 are often based on a worst-case scenario; they are not proposed management directions, which are identified in Chapter Three. |
| 82 | 8 | Impacts to aquifers are discussed in each alternative prescription under a section called Impacts to Water Resources from Locatable Minerals. See pages 4-4, 4-14, 4-30, and 4-39 of the Draft RMP/EIS. |
| 83 | 9 | Watershed protection for the Gunnison River through the Gunnison Gorge is identical in both the Conservation and Preferred alternatives. |

RIPARIAN/AQUATIC SYSTEMS

| | | |
|----|--------|--|
| 7 | 9, H-7 | The 200 AUM reduction is not a management action but rather the impact on livestock grazing that would result from limiting forage utilization in the riparian management unit to 35 percent. The intent of the restrictions on forage utilization and spring period grazing is to enhance recovery of woody vegetation and reduce soil compaction and bank damage during the wet, spring season. |
| 23 | 8 | The figures used on page 4-53 of the Draft RMP/EIS are actually impacts to aquatic habitat from other uses, and are not the result of the prescription for Management Unit D-9. The 70 miles recommended for intensive management includes the 40 miles in Management Unit D-9 along with additional miles that would be improved or protected through intensive grazing management and other actions. |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM'S RESPONSE TO THE COMMENT |
|-----------------|---------------------------|--|
| 24 | 8, 9, 23, L-21 | The 1,034-acre figure in Table 2-5 (page 2-8 of the Draft RMP/EIS) describes the actual existing riparian vegetation within the planning area. The 6,320 acres in the Preferred Alternative and other figures used in other alternatives reflect acres that would be managed for riparian improvement. This includes areas without existing riparian vegetation. |
| 40 | 20 | Current withdrawals do not restrict sales of mineral materials or mineral leasing. Revocation of the withdrawals would open the lands to mineral location under the 1872 Mining Laws. The BLM feels that current laws and regulations provide sufficient means to allow mining and still protect water quality and stream hydrology. |
| 97 | 1 | The numbers appearing after the stream names (e.g., Gunnison River No. 3) are the identifiers used by the Colorado Division of Wildlife for specific sections of a given stream. |
| 113 | 30 | Although there has been some improvement in stream bank cover in some areas over the past 10 to 20 years BLM data does not indicate this improvement is widespread or that optimum conditions would be obtained under the continuation of current Management Activities. |
| 114 | 30 | The BLM recognizes that differences exist within and between riparian areas. Specific management objectives and guidelines would be developed in Allotment Management Plans or other activity plans. |
| 116 | 23, 163, 169 | Riparian vegetation in the planning area generally exists as small, isolated areas along stream channels; the size of these areas precludes identification at the 1:200,000 scale of the RMP maps. Those areas which have the highest potential for improvement were identified in Management Unit D-9; management in these areas would be geared for riparian improvement. Other riparian areas would be either maintained or improved under the Preferred Alternative even though they are not identified individually. |
| 117 | 161 | The 35 percent utilization limit proposed in the Draft RMP/EIS would be the upper limit for livestock utilization only. There is no evidence at present to indicate that big game animals concentrate in, or make substantial use of, woody riparian vegetation within the planning area. The greatest concentration of animals occurs during the winter months; however, snow cover reduces big game dependence on free water sources, and animals do not concentrate in riparian areas. Improved water sources on the bench areas would improve wildlife habitat and distribution during the warmer months, but most of these sources would be frozen during the winter. |
| 118 | 8 | The management of riparian areas as described in each of the alternative prescriptions conforms to BLM's riparian policy, EO 11988, and EO 11990. None of these policies or Executive Orders exclude all negative impacts to riparian vegetation or aquatic habitat. Public lands are managed by the BLM for a variety of uses which, in most cases, can be compatible with appropriate stipulations. Specific objectives for improvement would be incorporated into new or existing activity plans after the Record of Decision for this plan is completed. |
| 119 | 9, 16, 23, 163, 169, L-21 | The restrictions the BLM is recommending are anticipated to result in riparian improvement. Monitoring studies would be utilized to determine if additional restrictions are needed. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|--|---|---|
| 121 | 11, 12, 30, 148, 152, 156, 161, 164, M-1, M-3, M-5, M-6, M-14, M-15 | The term riparian is defined on page A-39 of the Draft RMP/EIS. Year-round surface water is not necessary to maintain healthy riparian vegetation. In the Proposed Plan, the limit of 35 percent utilization would be used when other methods of improving riparian vegetation have been unsuccessful. The BLM has a substantial amount of information which supports even more severe restrictions than those in the Proposed Plan. However, based on the current conditions of the riparian areas, it is felt that substantial improvement would be obtained through other methods (i.e., changing season-of-use) and that a 35 percent utilization limit would be implemented only if necessary. |
| THREATENED AND ENDANGERED SPECIES | | |
| 11 | 7 | Table 2-6 and Table 2-8 have been changed (see the Changes to the Draft RMP/EIS section in this document). |
| 27 | 8, 9, 16, 23, 163, 169 | The text has been changed; see the prescription for Management Unit 8 in this document. |
| 99 | 7 | The U.S. Fish and Wildlife Service would be consulted prior to any surface disturbance or the development of any activity plan which may effect listed species or their habitat. |
| 100 | 9, 23, 169 | Tracts with known populations of threatened and endangered species are no longer identified as suitable for further consideration for disposal. All tracts would be inventoried for listed, candidate, and sensitive species prior to being offered for disposal. |
| 103 | 9, 23, 163 | The BLM consulted with the Colorado Natural Areas program throughout the development of the Draft RMP/EIS. Table 2-6 (page 2-10 of the Draft RMP/EIS) identifies all protected species known to occur within the planning area. <i>Astragalus wetherillii</i> has been added to Table 2-6 (see the Changes to the Draft RMP/EIS section of this document). All of the species listed on Table 2-6 are also on the State list. There were no other areas of public land identified for special protection within the planning area. |
| 104 | 9, 16, L-21 | A pre-disturbance clearance is conducted prior to the authorization of any surface-disturbing activity and occupied habitat is avoided. Monitoring studies designed to monitor long-term population trends and to detect impacts from livestock grazing and ORV use have been established in several areas. |
| 105 | M-3 | Some species of cacti, such as prickly pear, can be spread by livestock use. Available data does not show that the spineless hedgehog cactus is benefitted by livestock grazing in any way. |
| 106 | 30 | Based on the objectives of the Conservation Alternative, maximum protection was afforded the special plant resources in this management unit. In addition to the federally-listed plant species occurring in this area, the management unit was designed to afford protection for unique plant associations which are grazed by livestock and are readily accessible. |
| 135 | 23 | The protective measures mentioned on page 3-2 of the Draft RMP/EIS do extend to BLM sensitive species. They do not extend to State sensitive species or plant associations unless these species are included in the Colorado BLM's sensitive species list. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM'S RESPONSE TO THE COMMENT |
|--------------------------|---------------------------|---|
| WILDLIFE HABITAT | | |
| 29 | L-21 | Timber harvesting in this area would be designed to improve elk calving habitat. These design features could include season of harvest, increasing the rotation age, and harvesting to increase small openings in dense stands. |
| 96 | 34 | The badlands areas are not suitable habitat for bighorn sheep. |
| 98 | 156, 161 | Requiring the Colorado Division of Wildlife to pay grazing fees is an issue which goes beyond the scope and purpose of this RMP. At present, the BLM does not receive a percentage of the State's hunting license fees. However, the BLM has received contributed funds from the Colorado DOW for cooperative project work to improve wildlife habitat on public lands. These funds are derived from license fees and have amounted to a considerable sum statewide. We agree that wildlife do receive spin-off benefits from some range improvement projects funded by the BLM and grazing permittees. |
| 107 | M-12 | Present conflicts for forage between livestock and wintering big game are isolated. The Preferred Alternative allocates additional forage to wildlife in most of those areas where conflicts between private interests and wintering big game are occurring. |
| 109 | 9 | The BLM recently inventoried Fruitland Mesa for sage grouse strutting and wintering areas. The Colorado Division of Wildlife has been, and would continue to be, consulted prior to any habitat modification. The present sage grouse population is too small to be considered suitable for hunting and the available habitat is so limited that little can be done to increase the population. Under the Preferred Alternative, every effort would be made to maintain the present sage grouse population. |
| 110 | 172 | Many areas which were once available for big game use have been converted to other uses, such as agricultural and residential developments. With less habitat available on private land, it becomes necessary to selectively open up some closed pinyon-juniper stands to provide more forage on public land, especially in wintering areas. Prior to removal of the pinyon-juniper, the needs of other species using the area are identified so that system diversity can be maintained or improved. |
| 111 | 21, 161, 164, M-15 | Prior to reintroduction of desert bighorn sheep into the Camel Back area, a site-specific environmental analysis which would identify potential impacts would be completed. The reintroduction of desert bighorn sheep into similar habitat in Dominguez Canyon in 1983 has not resulted in detectable conflicts with livestock, big game, or riparian vegetation. Although bighorn sheep would use the streams as water sources, they would not remain in those areas where dense vegetation inhibits their ability to recognize predators and hazards. |
| LIVESTOCK GRAZING | | |
| 26 | 30 | The text has been changed; see the prescription for Management Unit 12 in this document. The Preferred Alternative (page 3-30, Draft RMP/EIS) also provides guidance for livestock grazing management. |
| 70 | 20, 34, H-6 | Public land administered by the BLM is managed for multiple-use. Livestock grazing is a legitimate use of public land and can be managed to avoid detrimental effects on sensitive areas. Under the Preferred Alternative, livestock grazing would |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|---------------------------|--|
| | | be limited to 35 percent utilization and the season of use would be restricted. ORV use and other surface-disturbing activities would also be restricted to improve watershed conditions. The BLM anticipates that both soil and vegetation conditions would improve as a result of the implementation of these measures. |
| 127 | H-2 | AUMs were estimated to increase by one percent per year for 10 years for impact analysis purposes only. This assumes that land treatments and more intensive grazing systems would be successfully implemented. |
| 128 | 1 | Livestock grazing is already restricted around most developments and facilities. The BLM would be willing to work with the Bureau of Reclamation (BOR) in adjusting or restricting livestock use where the BOR has identified adverse impacts from grazing on developments or facilities. |
| 129 | 129 | The BLM's livestock management program is designed to eliminate overgrazing and to improve vegetation condition. The Preferred Alternative would accomplish this through improved management, facility development, and land treatments designed to improve forage condition. Studies have shown a substantial increase in forage species' vigor and density following successful land treatment projects. |
| 131 | 21 | The decreases in AUMs in the Camel Back and Adobe Badlands WSAs are not proposed reductions; rather, this is the anticipated impact resulting from the 35 percent utilization restriction that is a part of the management prescriptions for the riparian and salinity areas. |
| 132 | 30 | Under the Conservation Alternative, livestock grazing and drifting would be completely eliminated in the Escalante Canyon RNA, Management Unit C-2. However, this would not preclude trailing of cattle on the Escalante Canyon road. |
| 133 | 30, 156 | Percent utilization is the amount—based on weight rather than height or appearance—of a plant's current growth which has been removed. Key species are those plants that, because of their importance, are monitored to evaluate whether objectives are being met. |
| 134 | 156, M-6 | Reductions mentioned in the Draft RMP/EIS reflect estimates under worst-case situations and are for impact analysis purposes only. Actual adjustments would be determined through long-term monitoring in accordance with grazing regulations. The BLM's philosophy for proper range management incorporates range management principles and various systems or philosophies, such as holistic resource management, where appropriate. |

RECREATION AND VISUAL RESOURCES

| | | |
|----|--------------------|---|
| 12 | 25, H-5, H-8, H-10 | These concerns have been addressed in the Addition to the Gunnison Gorge Recreation Area Management Plan. |
| 50 | 1 | Table 2-16 (page 2-19 of the Draft RMP/EIS) has been changed to include the proposed Curecanti National Recreation Area. The Fruitgrowers and Paonia areas will be evaluated for scenic quality and visual sensitivity when the BLM revises its visual resources inventory. |
| 53 | 9 | As stated on page 1-8 of the Draft RMP/EIS, additional background information concerning recreational use is available in the Management Situation Analysis. The only adequate information the BLM has on actual recreation use is for |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM'S RESPONSE TO THE COMMENT |
|-----------------|---|---|
| | | the Gunnison Gorge. All other recreation use is estimated from staff observations and from recreation users' comments. |
| 59 | 24 | The management prescription for part of Management Unit D-4 (15,610 acres) calls for a minimum of restrictions on surface-disturbing activities. The remainder of the unit (25,182 acres) would be managed for low but evident human concentrations and impacts. Leasing for oil and gas is not in conflict with this management guidance and, therefore, does not necessitate closing the area to leasing. |
| 65 | 112, 156, M-2, M-3 | The BLM may charge a user fee for recreational use of the public land if a permit system is in effect. Normally, a permit system would be considered only in a Special Recreation Management Area, such as the Gunnison Gorge, and not in extensive recreation areas. Costs of implementing and enforcing a fee system throughout the planning area could be prohibitive. |
| 69 | 14, 16, 22, 36, 37, 38, 41, 42, 44, 45, 46, 48, 52, 53, 54, 56, 57, 58, 60, 62, 64, 66, 67, 68, 71, 73, 74, 76, 77, 81, 91, 95, 97, 98, 107, 110, 119, 122, 123, 128, 130, 136, 153, 158, 161, 165, 166, 167, 168, 172, H-8, H-10, H-11, H-12, L-5, L-8, L-9, L-11, L-13, L-14, L-16, L-17, L-18, L-21, M-4, M-7, M-8, M-12 | The management prescription for Management Unit D-10 of the Preferred Alternative has been rewritten for the Proposed Plan (see Management Unit 10 in this document). The new prescription reflects management of the unit to enhance its use as an elk calving area. Specific interim management related to the potential ski area proposal has been deleted; the public lands within the unit would therefore be managed for extensive recreational use as indicated on page 3-30 of the Draft RMP/EIS. At present, information available on the potential ski area is insufficient to determine its compatibility with wildlife habitat, timber production, and coal production. Should a completed and final ski area plan be proposed, it would be considered in light of this plan's Record of Decision, resource conditions, and other pertinent factors existing at the time the proposal is submitted. |
| 120 | 22 | Under the Preferred Alternative, management direction for this area would emphasize elk calving. It was assumed all impacts to elk calving use from ski area development would be mitigated prior to approval of the ski area proposal. |

OFF-ROAD VEHICLES

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| 6 | 50, H-2 | The expense involved prohibited the inclusion of large, detailed ORV maps in the Draft RMP/EIS. It was felt that the smaller maps in Appendix G would serve to indicate potential problems from ORV proposals. More detailed maps were available upon request (see page A-21, Draft RMP/EIS). The Preferred Alternative recommends more acres for limited ORV use, based on the need to reduce impacts on soils, vegetation, and wildlife. |
| 55 | 64 | The regulations governing ORV use on public lands are contained in 43 CFR 8340. |
| 67 | 9, 11, 16, 23, 24, 30, 34, 50, 64, 112, 135, 161, 163, 165, 169, 172, H-2, L-21, M-2, M-13 | The BLM recognizes ORV use as a valid recreational use of the public land. Restrictions on ORV use are based on protecting natural resources and preventing conflicts with other public land uses. Where ORV use would cause excessive damage to resources or where conflicts with other uses are anticipated, areas were recommended for closure to or limitations on ORV use. If the effects from ORV use were not considered to be significant, the areas were recommended to be open to ORV use. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|---------------------------|----------------------------|---|
| 88 | 1 | Although the withdrawal order does not prohibit ORV use, lands actually being developed for Bureau of Reclamation (BOR) projects are closed by BOR regulations, unless opened by the BOR. ORV use on withdrawn lands not being used for project development is administered by the U.S. Forest Service or the BLM in accordance with their regulations (43 CFR 420). The ORV designations in this plan apply only to lands for which the BLM has administrative responsibilities. |
| 137 | 19, H-7 | In the Proposed Plan, the area within the boundary of the Camel Back WSA is recommended for closure to ORV use. |
| CULTURAL RESOURCES | | |
| 122 | 135 | Cultural and paleontological resources are protected by numerous laws and regulations. The BLM uses these laws and regulations to protect these resources through avoidance or mitigation of surface-disturbing activities. |
| 123 | 15, M-9 | In the Preferred Alternative, a portion of this area (5,848 acres) would be intensively inventoried for cultural resources. Through the Operation Respect program, the remaining area could be inventoried and monitored using volunteer expertise and labor from the Colorado Archeological Society. |
| 124 | 15, M-9 | These recommendations would be incorporated into activity plans designed to improve protection and public awareness of cultural resources on public lands. Under the auspices of Project Pride, brochures and interpretive displays could be funded through grant money made available to organizations committed to the preservation of cultural resources. |
| 125 | 15, M-9 | The Preferred Alternative recommends intensive inventory of 5,848 acres. Once this inventory is completed and specific information on high-value and high-density sites is obtained, activity plans designed to protect these sites would be developed. These could include changes in ORV designation. |
| 126 | 165, 168 | Upon completion of the intensive inventory, significant cultural sites would be assigned an appropriate designation such as Conservation for Future Study or Public Education use. The activity plans developed for these areas would identify the specific measures that would be needed to protect the areas' cultural values. |
| WILDERNESS | | |
| 4 | 19 | The Wilderness Technical Supplement (WTS) is an integral part of the RMP. It specifically details the wilderness issue and supports and backs up the RMP. Wilderness evaluations, analyses, and considerations are in the WTS. Only the recommendations from the WTS are brought forward into the RMP/EIS. Also see Responses Number 66, 68, and 136. |
| 10 | 10 | The Draft RMP/EIS and Draft WTS address and analyze the wilderness issue and the effects on it and from it. It is not the purpose of these documents to address alternative methods of power production. |
| 20 | L-21 | Coal leasing would be allowed in the upper portion of the Adobe Badlands WSA because this WSA would be recommended as unsuitable for wilderness under the Proposed Plan. |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM'S RESPONSE TO THE COMMENT |
|-----------------|----------------------------|---|
| 21 | L-12 | If all three WSAs were designated as wilderness, it would result in the closing of 41,865 acres to ORV use and oil and gas leasing. Since only the Gunnison Gorge WSA was recommended for wilderness designation in the Preferred Alternative, only 21,038 acres would be closed to these uses as a result of wilderness designation. Under the Proposed Management Plan, however, 6,783 acres within the Adobe Badlands WSA and the entire 10,402 acres of the Camel Back WSA would be closed to ORV use even though they were not recommended for wilderness designation. |
| 49 | 1 | Use of motorized equipment for emergency rescue operations may be allowed in a designated wilderness area. Use of motorized equipment by the Colorado Division of Wildlife (i.e. helicopters, outboard motors) may be allowed in a wilderness area with BLM State Director approval. These situations would be addressed in the wilderness management plan that would be developed for designated wilderness areas. |
| 51 | 22 | Mancos shale badlands are not inherently unsuitable for wilderness designation. The Adobe Badlands area will be managed as an Outstanding Natural Area, set aside to preserve unique geologic features and threatened and endangered plants. |
| 52 | 22 | An alternative that would recommend the Camel Back WSA as wilderness with provisions for water development on Winter Mesa is not needed. Under the BLM's Interim Management Policy, new permanent range improvements (i.e. stock reservoirs) may be approved for the purpose of enhancing wilderness values by better protecting the rangeland in a natural condition. Under the BLM's Wilderness Management Policy, new rangeland improvements may be allowed if determined to be necessary for the purpose of resource protection. |
| 54 | 10 | The text has been changed (see the Changes to the Draft RMP/EIS section in this document). |
| 56 | 18 | None of the WSAs are rated as having high mineral potential. The Gunnison Gorge WSA, which is recommended for wilderness designation, has a moderate rating for mineral potential, but there are no known mineral deposits. The BLM feels that the highest and best use of the Gunnison Gorge is as wilderness and has, therefore, recommended it as suitable. Congress will ultimately make the final decision on wilderness designation. FLPMA (section 603(a)) requires that a mineral survey be conducted by the U.S. Geologic Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in an area recommended as suitable for wilderness by the BLM. This report will be completed before the Secretary of the Interior forwards the wilderness designation recommendations to the President. |
| 57 | 6 | The BLM will address issues such as low level military flights in the Wilderness Management Plan that would be developed after Congress designates an area as wilderness. |
| 60 | 22, L-17 | Public Law 96-560, which released the U.S. Forest Service's Roubideau Rare II area from wilderness consideration, did not make any determination on adjacent lands administered by the BLM. Also see Response Number 136 (the last response in this section of this table). |
| 61 | 31, H-1 | If Congress designates the Gunnison Gorge as a wilderness area, Congress will also make the determination as to whether the proposed water projects would be allowed in the wilderness area, and if any mitigation of water rights would occur. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|--|---|
| 62 | 46, 47, 73 | Wilderness designation and wild and scenic river designation are two separate issues. Both require Congressional action under separate and distinct Acts. |
| 63 | 16, 24, L-21 | The private land in Red Canyon (within Management Unit D-4) was identified for acquisition on page 3-34 of the Draft RMP/EIS. The Gunnison Gorge Recreation Area Management Plan (July 1985) also identifies these tracts for acquisition. |
| 64 | 78, 147, M-10 | Livestock grazing is permitted in designated wilderness areas to the extent established prior to wilderness designation. New rangeland improvements may be allowed in designated wilderness areas if determined to be necessary for resource protection. |
| 66 | 21, 22, 26, 28, 87, 89, 101, 125, 139, 142, 143, 145, 150, 152, H-9 | The Gunnison Gorge WSA contains outstanding geologic, ecologic, scenic, and wilderness values. The area provides a wilderness whitewater boating opportunity not available in most other wilderness areas. If designated, this area would complement the adjacent National Park Service designated wilderness area. There is local and regional public and political support for designation of the Gunnison Gorge as wilderness. |
| 68 | 4, 11, 13, 14, 16, 19, 21, 22, 23, 24, 25, 26, 28, 35, 36, 38, 39, 41, 44, 45, 46, 47, 48, 51, 52, 53, 54, 56, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 80, 81, 83, 85, 87, 89, 91, 92, 94, 95, 96, 97, 98, 99, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, 127, 128, 129, 130, 131, 132, 133, 135, 136, 137, 139, 142, 143, 145, 147, 149, 150, 152, 153, 155, 158, 160, 162, 163, 165, 166, 167, 168, 169, 170, 171, 172, 173, H-2, H-4, H-6, H-8, H-10, H-11, H-12, L-1, L-3, L-4, L-5, L-6, L-7, L-8, L-9, L-10, L-11, L-12, L-13, L-14, L-15, L-16, L-17, L-18, L-19, L-20, L-21, M-4, M-7, M-8, M-10 | <p>All of the WSAs addressed in the Draft RMP/EIS and Draft WTS meet the requirements for study and consideration for preservation as wilderness. However, additional factors such as potential land uses, impacts to other resources, enhancement of the wilderness preservation system, actual wilderness values of the area, and other available management options all play a major role in determining whether an area should be recommended for designation as wilderness.</p> <p>The BLM recognizes that the Adobe Badlands area meets the minimum wilderness criteria, but does not feel that the area's wilderness qualities are significant enough to warrant inclusion in the National Wilderness Preservation System. Shale-type badlands are presently represented in the NWPS by the Bisti and De-na-zin wilderness areas in New Mexico, both of which are similar in appearance to and within a day's driving distance of the Adobe Badlands WSA.</p> <p>Although the wilderness qualities of the Adobe Badlands are not significant enough to warrant designation as wilderness, it is felt that the area's interesting landforms, threatened and endangered plants, and other values are deserving of some form of protection. Designation of the area as an Outstanding Natural Area is a more appropriate management option for protection of these values. The BLM is therefore recommending that the 6,783 acres of the WSA which contain these values be designated as the Adobe Badlands ONA/ACEC (see Management Unit 15). This management option would also allow the northern portion of the WSA, with its high to moderate coal potential, to remain available for coal leasing.</p> |
| 71 | 1, 3, 8, 10, 22, 31, 49, 165, 168 | These concerns will be addressed during preparation of the final wilderness EIS. |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTS OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|--|--|
| 130 | 19 | Under the Preferred Alternative, the Camel Back WSA becomes part of Management Units D-1, D-2, and D-9. Management for these units corresponds to and is consistent with the management direction outlined in Table 3-8 of the Draft RMP/EIS. |
| 136 | 9, 11, 13, 14, 16, 19, 21, 22, 23, 24, 25, 26, 28, 35, 36, 37, 38, 39, 41, 43, 44, 45, 46, 47, 48, 49, 51, 52, 53, 54, 55, 56, 58, 59, 60, 61, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 80, 81, 83, 85, 87, 89, 91, 92, 94, 95, 96, 97, 98, 99, 101, 102, 103, 104, 106, 107, 108, 109, 110, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, 127, 128, 129, 130, 131, 132, 133, 135, 136, 137, 138, 139, 142, 143, 145, 147, 148, 149, 150, 152, 153, 155, 158, 160, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, H-2, H-4, H-6, H-7, H-8, H-10, H-11, H-12, L-1, L-3, L-4, L-5, L-6, L-7, L-8, L-9, L-10, L-11, L-12, L-13, L-14, L-15, L-16, L-17, L-18, L-19, L-20, L-21, M-4, M-7, M-8, M-10 | <p>All of the WSAs addressed in the Draft RMP/EIS and Draft WTS meet the requirements for study and consideration for preservation as wilderness. However, additional factors such as potential land uses, impacts to other resources, enhancement of the wilderness preservation system, actual wilderness values of the area, and other available management options all play a major role in determining whether an area should be recommended for designation as wilderness.</p> <p>The BLM recognizes that the Camel Back area meets the minimum wilderness criteria, but does not feel that the area's wilderness qualities, although possibly important on a local or regional scale, are significant enough to warrant inclusion in the National Wilderness Preservation System. The Dominguez WSA (73,568 acres) and the Gunnison Gorge WSA (21,038 acres) have both been recommended as suitable for wilderness designation; both of these WSAs are within short driving distances of regional population centers so wilderness designation of the Camel Back WSA would not significantly expand wilderness opportunities in this area.</p> <p>The character, landforms, rock formations, and vegetation of the Camel Back WSA are very similar to those of the Dominguez WSA, which is located within eight miles of the Camel Back WSA. Features typical of both the Camel Back WSA and the Dominguez WSA are the steep-sided mesas covered with pinyon-juniper woodlands and scattered sagebrush parks, and the deep, colorful, sandstone canyons with canyon-bottom riparian vegetation that includes cottonwood, willow, and tamarisk. Roubideau Canyon (within the Camel Back WSA) possesses some outstanding visual features, but it is not unlike several other plateau-region canyons, including upper Spring Creek Canyon, Escalante Canyon, and especially Dominguez Canyon, all of which have similar formations, vegetation, coloration, and scenic qualities. In addition to its natural and scenic values, the Camel Back area provides important habitat for wildlife and threatened and endangered species, and is also used for livestock grazing.</p> <p>Because the Camel Back area's wilderness values are not significant enough to warrant inclusion in the NWPS, the BLM is not recommending it for wilderness designation, and has determined that identifying the area for continued multiple-use management is both effective and appropriate. To provide protection for the area's natural and scenic values, to prevent accidental destruction of threatened and endangered plants, and to reduce active erosion, the Proposed Plan recommends closing the area within the WSA boundary to ORV use.</p> |

SPECIAL MANAGEMENT AREAS

| | | |
|----|--|---|
| 19 | L-21 | The BLM feels there is adequate space within Management Unit 14 for a nature trail and other interpretive purposes. |
| 28 | 9, 16, 23, 163, L-3, L-4, L-5, L-7, L-8, L-9, L-11, L-13, L-17, L-21, M-12 | The text has been changed; see the management prescriptions (in this document) for Management Units 12, 13, and 15. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|--|
| 37 | 9 | The recommendations of the BLM Geologic Advisory Group concerning the 1,800 acres in Chukar Canyon and the Ute Indian fault zone were reviewed and considered. These areas are within the Gunnison Gorge WSA, which is recommended for designation as wilderness. On August 22, 1972, the BLM designated Needle Rock as a Class IV Outstanding Natural Area under the Bureau of Outdoor Recreation classification system. |
| 101 | 8, 24 | One purpose of an Environmental Impact Statement is to analyze the impacts of the various alternatives to a proposed action. If management of Areas of Critical Environmental Concern (ACECs) are identical under all management alternatives, there would be no reason to analyze the impacts. The Preferred Alternative gives priority to the protection of ACECs; management priorities emphasize ACECs less in other alternatives. The designation of an ACEC is a discretionary management action which necessitates full environmental analysis and public input. Activity plans will be developed for all designated ACECs as the BLM's operating budget permits. |
| 102 | 8, 11, 24 | Both the Conservation and the Preferred alternatives recommend three areas for ACEC identification; under the Proposed Plan the recommendation has been expanded to four areas. All of the areas which have been identified by either the public, other agencies, or the Resource Area staff have been recommended for some form of special designation. |

LAND TENURE ADJUSTMENTS AND LAND USE MANAGEMENT

| | | |
|----|---|---|
| 16 | 4 | The Final RMP/EIS map has been changed to show all lands within the Black Canyon of the Gunnison National Monument which are administered by the National Park Service. The lands within the proposed Curecanti National Recreation Area are shown as Bureau of Reclamation withdrawn lands since formal designation as a National Recreation Area has not yet occurred. |
| 17 | 4 | The lands near the northeast boundary of the Black Canyon of the Gunnison National Monument are Bureau of Reclamation withdrawn lands, not potential exchange tracts (see map legend). |
| 85 | 7, 9, 16, 22, 24, 40, 135, 172, H-2, L-21, M-12 | Specific criteria for the identification of tracts determined to be suitable for further disposal consideration have been added (see the Disposal of Public Lands discussion in the Proposed Plan section of this Final RMP/EIS). Tracts that do not meet these criteria are no longer being considered as suitable for disposal. All public lands administered by the BLM that do not meet these criteria would be retained in public ownership. |
| 87 | 1 | The BLM would retain withdrawals for all Bureau of Reclamation structures and linear rights-of-way for all laterals on tracts that would be identified for disposal. |
| 89 | 1 | The Final RMP/EIS map has been changed to reflect these corrections. Standard mapping practice is to not show withdrawals over water surfaces. The withdrawal boundary extending into the reservoir is indicative of the lands affected by the withdrawal. Disposal would be contingent upon the lifting of existing withdrawals on those tracts in T. 14 S., R. 92 and 93 W. |
| 90 | 1 | The text has been changed to include all public entry laws. See the Changes to the Draft RMP/EIS section of this document. |
| 91 | 1 | Current laws and regulations do not permit the transfer of BLM powersite reserves to the Bureau of Reclamation. Under the Proposed Plan, the powersite |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|--|
| | | classifications in the Dominguez area would be lifted to allow a full range of multiple-use management. |
| 92 | 1 | The text has been changed; the column in Table 2-17 entitled "Purpose" is now entitled "Primary Purpose". See the Changes to the Draft RMP/EIS section in this document. |
| 93 | 1 | All tracts currently under Bureau of Reclamation withdrawal would be evaluated through the withdrawal review program; if the withdrawals are not lifted, these tracts would be retained in public ownership. |

MAJOR UTILITIES

| | | |
|-----|-------------|--|
| 30 | 11, 31 | Management Unit D-7 would be managed for existing and potential coal development. Major utilities in areas containing coal resources would result in a loss of coal revenue because State regulations require that surface structures be protected from subsidence. This is usually accomplished by leaving more coal in-place to support the surface structures than would normally be required for room-and-pillar mining. If utility corridors were permitted over coal resources, the coal would not be managed in the best and most efficient manner. |
| 94 | 9, 16, L-21 | Whether an area (including all special management areas) is open, closed, or restricted to major utility development is addressed by management unit in each of the alternative prescriptions (see Chapter Three of the Draft RMP/EIS). |
| 95 | 31 | The 1980 Western Regional Corridor Study is a planning tool and has been used as such during the preparation of this RMP/EIS. In addition to the 1980 Study, the BLM also utilized the 1985 Western Regional Corridor Study, and consulted with the Delta-Montrose Electric Association, the Colorado-Ute Electric Association, the San Miguel Power Association, the U.S. Forest Service, and the BLM offices administering adjacent public lands. |
| 112 | 31 | The disturbance associated with construction and maintenance of major utilities and their related facilities increases stress on big game, especially when this disturbance occurs on crucial winter ranges when the animals are already under stress caused by environmental factors. Mitigating measures help avoid or reduce much of this impact, although such measures are seldom 100 percent effective. |
| 115 | 31 | As stated on page 3-38 of the Draft RMP/EIS, riparian areas would be open to the development of major utility facilities. Only surface-disturbing activities which would have long-term adverse effects would be prohibited. |

ACCESS AND TRANSPORTATION

| | | |
|----|----------------|--|
| 9 | 152, H-9, H-11 | Public access across private land is generally obtained through purchased easements. Condemnation can be used as a last resort, but only if negotiations fail completely and such action is justifiable. After a route analysis is completed to determine the best access location, the BLM negotiates with the landowner(s) to determine mitigating measures and resolve problems and conflicts. The BLM usually assumes maintenance responsibility for all acquired easements. |
| 18 | H-2 | The BLM recommends acquisition of public access on the McCarty Trail in the Preferred Alternative on page 3-32 of the Draft RMP/EIS. |

RESPONSES TO COMMENTS

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|----------------------------|--|
| 48 | H-2 | As stated on page 3-35 of the Draft RMP/EIS, the BLM has proposed access acquisition in these areas. The BLM presently manages some land at the confluence which is used as a boater put-in/take-out site. The adjacent private land (Gunnison River Pleasure Park) provides a raft/kayak take-out point, but a user fee is charged; public use is not otherwise restricted. |
| 84 | 22 | Revised Statutes 2477 (RS 2477) was repealed by the Federal Lands Policy and Management Act of 1976 (FLPMA). The acknowledgement and documentation of RS 2477 grants for public highways constructed on unreserved public land prior to October 21, 1976, is a non-discretionary action and, therefore, does not necessitate inclusion in this RMP/EIS. |

SOCIAL AND ECONOMIC RESOURCES

| | | |
|---|-----|---|
| 1 | H-2 | The location of the Storm King Ski area is shown as Management Unit C-10 on the Conservation Alternative map. The information on pages 4-60 and 4-61 of the Draft RMP/EIS was derived from data provided by Storm King Associates (the proposal's developer), Colorado Ski Country U.S.A., and the State of Colorado through the Division of Local Government's Computer Model-Planning and Assessment Model. |
| 3 | 11 | In Chapter Four of the Draft RMP/EIS, resource management trade-offs are identified as impacts which are generated by various management actions. These impacts, including effects on economic conditions under each of the management alternatives, were considered in the development of the Preferred Alternative and will be considered in the final resource management plan. |

GENERAL RESOURCE MANAGEMENT

| | | |
|----|---------------|--|
| 2 | 22, L-17 | The Preferred Alternative was developed based on the identified issues, public input, conflicts with other resources and uses, and laws and regulations. It is composed of portions or combination of portions of the other management alternatives. The Preferred Alternative is not a final decision; rather it represents the management that the BLM has proposed for the public lands in the planning area. The RMP/EIS is published as a Draft to allow for public review and comment. After consideration of the public input, the BLM will develop the Final Resource Management Plan and provide rationale for the final decisions. |
| 5 | H-2 | It would be impossible to show in detail on a map all the areas that would be impacted by the various actions. The maps in the Draft RMP/EIS illustrate where most resources are located and this helps indicate where impacts would occur. Since the plan covers a possible 15-year period and some actions, such as utility development, mining, and oil and gas exploration and development are not planned by the BLM, the locations and time frames on specific impacts are not known. |
| 13 | 11, H-3, H-11 | The RMP is a general land use plan that establishes land use allocations. The BLM feels this plan provides the general objectives and guidance needed to manage the public lands. Based on the direction in the RMP, specific activity plans which will identify objectives, mitigating measures, and specific management actions will be developed for the various resources and resource uses. |

Table 3 (continued)

| RESPONSE NUMBER | COMMENTER OR LETTER NUMBER | BLM's RESPONSE TO THE COMMENT |
|-----------------|--|--|
| 14 | H-13 | Although the management unit boundaries shown on each map cross private and other non-federal lands, the management prescriptions apply to only those lands for which the BLM has administrative authority. This includes surface and/or subsurface estate. |
| 15 | 5 | The boundary of Management Unit D-15 is the Cimarron River; the unit is not adjacent to High Mesa. |
| 22 | 16, L-21, M-12 | Since specific data for proposed actions from mining and other surface-disturbing activities are not known, impacts were expressed in qualitative rather than quantitative terms. Environmental assessments will be prepared on specific actions and projects, following the general land use allocations provided in the RMP. Impacts will be analyzed and quantified at that time. |
| 25 | 8 | It is the BLM's policy to involve the public and local, state, and federal government agencies in the planning process. Attempts have been and will be made to gain input from these entities on site-specific proposals, actions, and environmental assessments. |
| 86 | 27, 28, 79, 82, 84, 86, 88, 93, 100, 111, 124, 134, 140, 141, 144, 146, 148, 151, 154, 159, 161, | BLM management is based upon the principles of multiple-use and sustained yield; it is a combination of uses that takes into account long-term needs for renewable and non-renewable resources. All of the alternatives described in the Draft RMP/EIS are designed to provide multiple-use management but are based upon different overall management objectives. |
| 108 | 5 | The areas covered by the three proposed wildfire suppression strategies are discussed in the Management Situation Analysis, which is available for public review. Consultation with the U.S. Forest Service will be completed prior to issuance of the Record of Decision for this resource management plan. |



CHANGES TO THE DRAFT RMP/EIS

Table 4 is a list of changes that have been made to the text of the Draft RMP/EIS. Map 1 shows the changes in the Limited ORV use areas, and Map 2 depicts the changes in the areas Closed to ORV use; these maps (originally in Appendix G of the Draft RMP/EIS) immediately follow Table 4.

These text and map changes were made in response to public comments or to internal BLM review. The list of changes is not extensive since the Proposed Resource Management Plan (a modified version of the Preferred Alternative) and its accompanying map are included in this document.

Table 4
CHANGES TO THE DRAFT RMP/EIS

| LOCATION OF CHANGE | CHANGE |
|---|---|
| Page 1-1; Topics Not Addressed in this Plan | At the end of this section add: Potential Colorado National Guard Artillery Range. (This land use proposal will be analyzed in a site-specific analysis when a final application for use is received.) |
| Page 2-3; Oil, Gas and Geothermal Resources; second paragraph | Change the third sentence to read: The potential for oil and gas production in the planning area is considered low to moderate. There has been little past and no recent production. |
| Page 2-10; Table 2-6 | Add the following entry: (Common Name) Wetherill milkvetch; (Scientific Name) <i>Astragalus wetherillii</i> ; (Status) BLM Sensitive; (Habitat) Clay hills in association with pinyon-juniper and sagebrush; (Estimated Population) Unknown; (Estimated Acres of Habitat) Unknown. |
| Page 2-10; Table 2-6 | Change the habitat description for Spineless hedgehog cactus to read: Rocky soils. Change the habitat description for Uinta Basin hookless cactus to read: Gravelly soils on flats and low hills along major drainages. Change the habitat description for Delta lomatium to include: and mid-altitude Mancos shale in association with pinyon-juniper. |
| Page 2-12; Table 2-8 | Change the status for the river otter to read: State endangered and federal candidate. |
| Page 2-19; Table 2-16 | Add the following entry: (Area Identification, Number and Name) 35 Proposed Curecanti National Recreation Area; (Size, acres) 3,200; (Scenic Quality) A; (Visual Sensitivity) H; (Viewing Distance) FG; and (Visual Resource Management Class) II. |
| Page 2-20; Gunnison Gorge WSA | At the end of this section add: The City of Delta, the Pittsburg and Midway Coal Company, and the Colorado-Ute Electric Association hold conditional water decrees on the Gunnison River for potential hydroelectric development. Each proposal for hydroelectric development would affect the Gunnison Gorge WSA in some way. In March 1988, the Pittsburg and Midway Coal Company donated flow rights of 300 cubic feet per second in the Gunnison Gorge to The Nature Conservancy. |
| Page 2-21; Withdrawals; first paragraph | At the end of the paragraph add: Legal descriptions identifying withdrawals, classifications, and reservations are included in the Management Situation Analysis (MSA) document, which is available for public review at the Montrose BLM Office. |

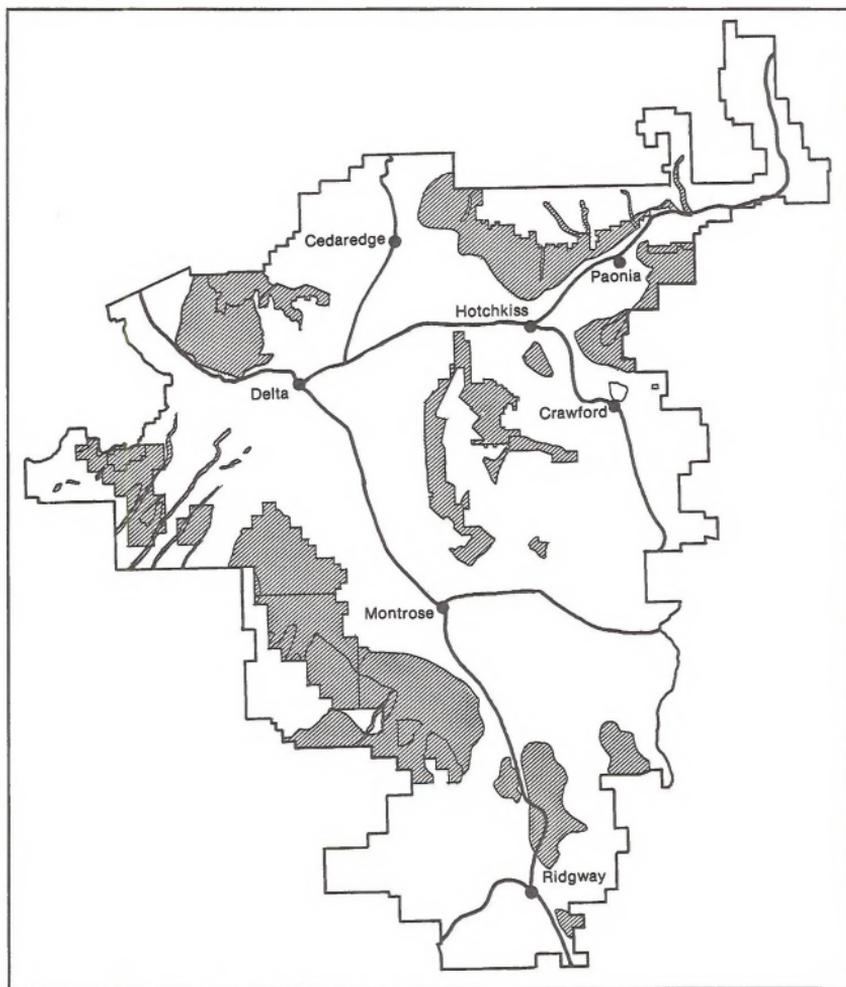
CHANGES TO THE DRAFT RMP/EIS

Table 4 (continued)

| LOCATION OF CHANGE | CHANGE |
|--|--|
| Page 2-21; Withdrawals; second paragraph | Change the second and third sentences to read: These withdrawals segregate the affected lands from all public entry laws, including the general mining laws. |
| Page 2-21; Withdrawals; third paragraph | Change the second sentence to read: Each reserve typically involves 40 acres and segregates the affected lands from operation of the public land laws and from non-metalliferous minerals under the mining laws. |
| Page 2-22; Table 2-17 | Change the title of column four from Purpose to Primary Purpose. |
| Page 3-18; Management Unit C-1; Locatable Minerals | Remove the word pre-FLPMA. |
| Page 3-25; Management Unit C-15; Special Land Uses | Delete this entire paragraph. |

PROPOSED PLAN

Off-road Vehicle Designation Map



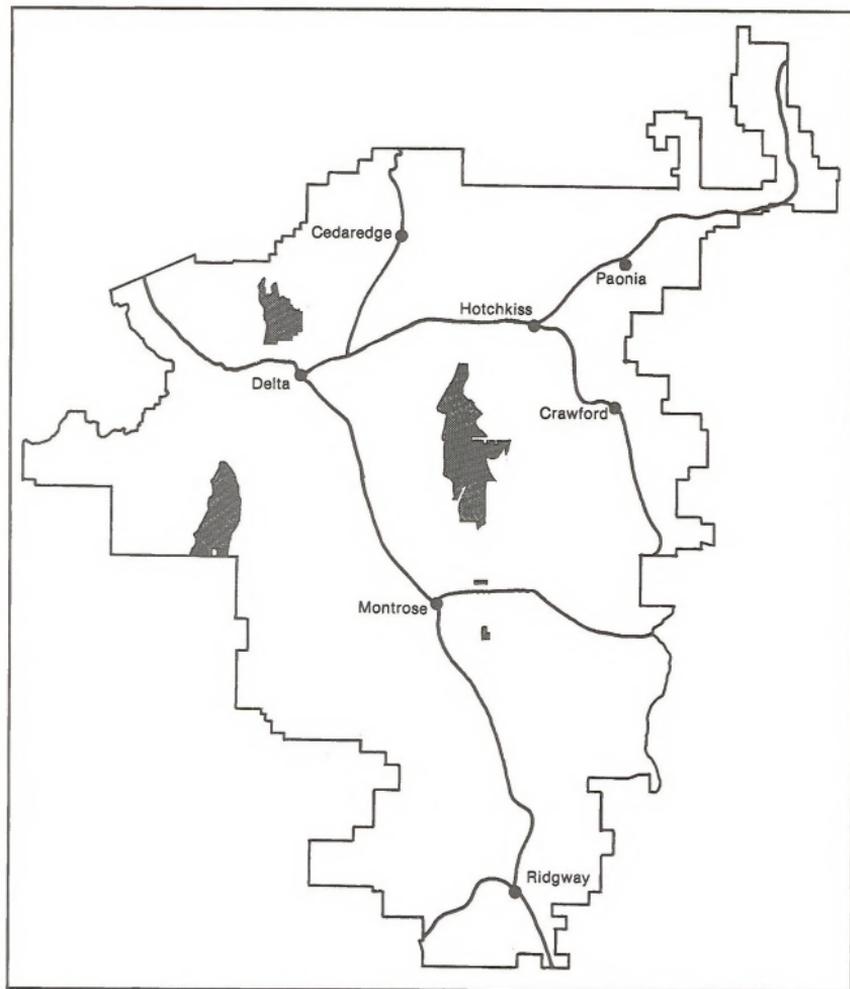
LIMITED: Areas Where Official Vehicle Use Would be Limited to Designated Roads and Trails, Either Seasonally or Year-round.



Scale: 1" = 10 Miles

PROPOSED PLAN

Off-road Vehicle Designation Map



CLOSED: Areas Which Would be
Closed to Off-road Vehicles Use Year-round.



Scale: 1" = 10 Miles

THE PROPOSED RESOURCE MANAGEMENT PLAN

The Proposed Resource Management Plan was developed based on an analysis of the public comments received on the Draft Uncompahgre Basin RMP/EIS. Under the Proposed Plan, the planning area would be managed under the multiple-use concept with restrictions applied so that management objectives would be achieved.

All actions proposed in this plan would comply with current state and federal regulations, standards, and policies. In addition, the following assumptions were made:

1. Site-specific activity plans would be developed or revised, if necessary, to provide detailed management guidance for all management units except the general resource management unit.
2. Site-specific Environmental Analyses (EAs) and Environmental Impact Statements (EISs), if required, would be developed for all management plans and projects within the planning area.
3. The most reasonable foreseeable level of oil, gas, and geothermal development throughout the planning area would involve a maximum of ten applications to drill per year, with an estimated total of 30 acres of surface disturbance per year.
4. Lands cases generated by other agencies, individuals, and entities would be analyzed and processed on a case-by-case basis in accordance with guidance provided by this plan.
5. Recreation and Public Purposes Act (R&PP) land use classifications currently under lease would be retained with the exception of the Delta County and Montrose County landfills.
6. All Wilderness Study Areas (WSAs) would be managed consistent with the Wilderness Interim Management Policy until the final decision on wilderness designation or non-designation is made.
7. The areas recommended for designation as an Outstanding Natural Area (ONA) or a Research Natural Area (RNA) would also be designated as areas of critical environmental concern (ACEC).

Some resource management programs would be standard throughout the planning area under the Proposed Plan. Unless changes in or additions to standard management directions are specifically addressed in the management prescription for each management unit, these resources, programs, and activities would be managed as follows.

Air Quality. Activities and projects on public land would comply with applicable local, state, and federal air quality

regulations. Mitigation to minimize air quality degradation would be incorporated into project proposals as appropriate.

Coal. Federal coal estate would be identified as acceptable for further leasing consideration.

Oil, Gas, and Geothermal Resources. At present, the oil and gas program within this planning area is highly speculative. Only three applications to drill have been received over the past twelve years; none of these resulted in producing wells. Based on this data, the BLM does not foresee any change in the oil and gas program over the life of this plan.

Federal oil, gas, and geothermal estate on both federal surface and split-estate lands would be open to leasing with standard lease terms. Other conditions for leasing such as no surface occupancy and seasonal stipulations (see Appendix A of this Proposed Plan) are assigned in each management unit prescription; special stipulations and conditions also apply to federal surface and split-estate lands. Any special stipulations (i.e., seasonal closures) prescribed for a management unit would apply to seismic and drilling activities.

Resource information for split-estate lands, upon which the recommended stipulations are based, has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. Consultation with the surface owner also requires the consideration of private uses of the surface. If, after on-site inspection and consultation, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Locatable Minerals. All existing withdrawals that segregate federal mineral estate from location and entry under the general mining laws would be recommended for retention. Federal mineral estate in areas not under withdrawal would be open to entry and location.

PROPOSED PLAN

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials.

Soils and Water Resources. Water quality and erosion conditions would be inventoried and monitored. Measures designed to minimize erosion and water quality deterioration would be required in plans for surface-disturbing land use activities. The area would be open to land treatments and development of in-channel structures and project facilities.

Riparian/Aquatic Systems. Riparian zones and aquatic habitats would be inventoried and monitored where necessary to provide information for proper management. Vegetation conditions and streambank cover would be maintained or improved. Measures designed to minimize site-specific riparian and aquatic deterioration would be required in plans for surface-disturbing land use activities.

Threatened and Endangered Species. Threatened and endangered species and unique plant associations would be inventoried and monitored where necessary to provide information for proper management. Clearances would be conducted on all proposed surface-disturbing activities and the U.S. Fish and Wildlife Service (USFWS) would be consulted as required. Measures designed to protect threatened and endangered species and their habitat would be required in all land use activity plans. Supplemental releases and reintroduction of federal and state listed endangered, threatened, and candidate species could be authorized following environmental analysis and consultation with the USFWS, the Colorado Division of Wildlife (DOW), and other affected parties.

Wildlife Habitat. Wildlife forage allocations would remain at current levels until studies determine adjustments are needed to achieve management objectives. Additional forage allocations would be divided equally between wildlife and livestock grazing. Wildlife habitat monitoring studies would be established and/or maintained on all crucial winter ranges. The planning area would be open to land treatments and project facility development. Existing wildlife facilities and land treatments would be maintained. Supplemental releases and reintroduction of native or naturalized fish and wildlife species (excluding federal or state listed endangered, threatened, or candidate species) could be authorized by the District Manager following environmental analysis.

Livestock Grazing. Suitable public lands would be available for livestock grazing use. Livestock utilization would be managed at current forage allocation levels until studies indicate adjustments are needed to achieve management objectives. New or additional available forage would be divided equally between livestock and wildlife. Existing livestock facilities would be maintained. Existing allotment management plans (AMPs) would be updated as needed and new AMPs would be developed. New livestock facilities and land treatment projects would be developed if needed to achieve AMP objectives. Vegetation

condition and trend monitoring studies would be established and/or maintained. Maximum sustained livestock utilization levels of key forage species would be 50 percent. Allotment categorization would determine management and monitoring intensity.

Forestry. Suitable commercial forest lands and pinyon-juniper woodlands would be managed for sustained yield production within the allowable cut restrictions determined by the Timber Production Capabilities Classification (TPCC) inventory.

Recreation. Public lands would be managed for extensive recreational use.

Off-Road Vehicles. Public lands would be open to off-road vehicle (ORV) use.

Cultural Resources. Cultural and historical sites would be inventoried. Clearances would be conducted on sites of all proposed surface-disturbing activities. Measures designed to protect cultural and historical resources would be required in all land use activity plans.

Paleontological Resources. Paleontological resources would be inventoried and appropriate protective measures would be developed if necessary.

Visual Resources. Public lands would be managed under current visual resource management (VRM) classifications and guidelines.

Major Utilities. Public lands would be open to development of major utility facilities. Stipulations and mitigating measures would be developed on a case-by-case basis.

Powersite Withdrawals. Pending determination of potential, existing powersite withdrawals would be maintained. These lands would not be subject to further consideration for disposal. No significant long-term investments would be made on these lands unless the investment could be recovered prior to development.

Access. In addition to the specific access needs identified in the management unit prescriptions, the access needs identified in the resource area's transportation plan would be acquired as opportunities arise.

Fire Management. Any fire which occurs in a fire use category area before a prescribed burn plan is approved, or which is not within the limits of the prescription, or which threatens life or property would be suppressed as a conditional suppression area fire.

The following management prescriptions comprise the Proposed Resource Management Plan. Acreage figures used in this discussion are approximations. Table 5 identifies the management units that were established for the Proposed Plan.

Table 5
MANAGEMENT UNITS:
PROPOSED PLAN

| MANAGEMENT UNIT | ACRES OF PUBLIC SURFACE | PERCENTAGE ¹ OF THE PLANNING AREA | IMPORTANT RESOURCES, VALUES, OR LAND USES |
|-----------------|-------------------------|--|--|
| 1 | 186,810 | 39% | Livestock grazing, wildlife habitat, recreation, woodlands |
| 2 | 67,320 | 14% | Wildlife habitat, coal, woodlands |
| 3 | 47,607 | 10% | Woodlands, wildlife habitat, livestock grazing |
| 4 | 40,792 | 8% | Recreation, soils, woodlands |
| 5 | 24,177 | 5% | Soils, recreation, oil and gas |
| 6 | 21,038 | 4% | Wilderness, recreation, T&E species |
| 7 | 17,232 | 4% | Coal, wildlife habitat |
| 8 | 8,942 | 2% | Recreation, soils |
| 9 | 6,320 | 1% | Riparian/aquatic habitat, livestock grazing |
| 10 | 3,292 | Less than 1% | Wildlife habitat, coal, recreation, commercial timber |
| 11 | 1,990 | Less than 1% | Wildlife habitat, recreation |
| 12 | 1,895 | Less than 1% | Recreation, T&E species |
| 13 | 377 | Less than 1% | T&E species, soils |
| 14 | 80 | Less than 1% | Recreation, scientific values |
| 15 | 6,783 | 1% | T&E species, scenic values, soils |
| 16 | 48,422 | 10% | General land uses |

¹ Percentages are rounded to whole numbers.

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DISPOSAL OF PUBLIC LANDS

Disposal criteria have been developed for use in identifying disposal tracts under the Proposed Plan. These tracts are identified on the map that accompanies this document.

General Disposal Criteria. Tracts of public land that are difficult and uneconomical to manage because of their location and other characteristics, and tracts of public land that would best serve the public interest through their disposal would be identified as suitable for disposal under the Proposed Plan.

Specific Disposal Criteria. Tracts of public land meeting the following specific criteria would be identified as suitable for disposal under the Proposed Plan:

1. Tracts of 500 acres or less which: (1) are not administrative sites; (2) do not contain important mineral resources; (3) do not contain known threatened or endangered species; or (4) do not border lakes, rivers, or perennial streams where potential recreational development is likely.
2. Existing R&PP landfill sites.

A total of 143 tracts of public land totalling 11,026 acres would be identified for consideration for disposal through sale or exchange under the Proposed Plan. Existing R&PP classifications on two tracts and existing withdrawals on several tracts would be lifted prior to disposal.

Prior to disposal, resources within identified tracts would be managed according to the management prescription for the management unit in which they are located. Minimal funds, if any, would be spent on improvements on these lands. Federal mineral estate would be conveyed with surface estate where it would be in the public interest.

MANAGEMENT UNIT 1

186,810 Acres of Public Surface; 39 percent of the Planning Area

Management Unit 1 consists of 186,810 acres of public land located primarily on the northeast-facing slopes of the Uncompahgre Plateau north of Colorado Highway 90. The area's range of elevations gives it a high value for both summer and winter livestock grazing.

Public lands within the management unit would be managed as "I" category (150,114 acres), "M" category (25,727 acres), and "C" category (8,950 acres) grazing allotments. Also, 2,019 acres that are presently unallotted for livestock use would be available for grazing application.

The management unit would be managed to improve vegetation conditions and forage availability for livestock grazing. Land treatment projects and other facilities designed to improve livestock forage and distribution would be

developed. Intensive monitoring studies would be established and maintained on all "I" and "M" category allotments. Existing AMPs would be updated as needed and new AMPs would be developed for allotments without plans. As additional forage becomes available, livestock would have priority for allocation. Relinquished, cancelled, or acquired livestock grazing permits would be reissued according to regulations.

Oil and Gas. Federal oil and gas estate would be open to leasing. Seasonal stipulations on seismic and drilling activities would be in effect from December 1 through April 30 on 64,815 acres (federal surface) and 560 acres (split-estate) of crucial deer and elk winter range, and on 3,757 acres (federal surface) and 63 acres (split-estate) used by bald eagles for hunting habitat. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The Bureau of Reclamation (BOR) withdrawal on Fruitland Mesa and both the BOR withdrawal and the BLM porsite classifications along the Gunnison River downstream of Delta would be recommended for revocation to allow for mineral exploration and development, facilitate resource management, and permit long-term land use planning.

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigating measures would be incorporated into new and existing AMPs. In-channel structures and land treatment projects designed to reduce runoff and soil erosion would be developed.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new and existing AMPs. Existing wildlife habitat projects would be maintained. Bighorn sheep could be transplanted into the Winter Mesa area if they would not conflict with current and future livestock grazing forage allocations. Wildlife would have first priority for all additional forage made available as a result of non-BLM wildlife-funded rangeland improvement projects.

Forestry. Woodland harvest areas would be managed for increased forage production and would be compatible with AMPs.

Recreation. River access would be developed at the Escalante Bridge. Maps and informational materials on river use would be provided. The BLM would manage recreation use in a manner that would minimize recreational impacts on interspersed and adjacent private land.

Off-Road Vehicles. A total of 7,240 acres in the Winter Mesa/Roubideau Creek area would be closed to ORV use. Vehicle use on crucial deer and elk winter range (64,815 acres) would be limited to designated roads and trails from December 1 through April 30 if necessary to reduce stress

on wintering deer and elk. The remainder of the management unit would be open to ORV use.

Cultural Resources. A total of 5,848 acres of public land between Colorado Highway 90 and the Big Sandy Wash would undergo a Class III cultural inventory to determine the significance and location of high-value archeological sites. Upon completion of the inventory and data analysis, some of these sites may be assigned a special designation and a management plan would be developed.

Visual Resources. The management unit would be managed under VRM Class III guidelines, except for Escalante Canyon which would be managed under VRM Class II guidelines to protect its scenic qualities.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would improve livestock management and increase crucial deer and elk winter range would be acquired through exchange only.

Access. Public road access would be acquired into the Olathe Reservoir area for hunting and other recreational purposes. Public trail access would be acquired on the McCarty Trail in lower Escalante Canyon to provide additional access into the Dominquez Canyon WSA.

Fire Management. A total of 97,543 acres of public land would be managed under the fire suppression category, with 8,657 acres identified for intensive suppression and 88,886 acres identified for conditional suppression. A total of 89,267 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 2

67,320 Acres of Public Surface; 14 percent of the Planning Area

Management Unit 2 consists of 67,320 acres of public land located primarily on the southern end of the Uncompahgre Plateau and in the lower elevations of the North Fork Valley. These areas have large wintering deer and elk populations. Approximately half of the management unit is considered crucial deer and elk winter range. A portion of the unit, in the Camel Back/Roubideau Creek area, is suitable habitat for desert bighorn sheep.

The management unit would be managed to improve the areas' capabilities to support wintering deer, elk, and bighorn sheep populations. Land treatment projects and other facilities designed to improve the quality and quantity of winter habitat would be developed. Wildlife would have first priority for all additional forage made available as a result of BLM habitat improvement projects. All other land uses would be permitted if they would not degrade the areas' winter range capabilities. Disturbances would be

minimized from December 1 through April 30 on crucial deer and elk winter range (37,007 acres). Habitat in the Camel Back/Roubideau Creek area would be available for possible introduction of desert bighorn sheep.

Coal. Federal coal estate would be open to leasing. Within crucial deer and elk winter range, seasonal stipulations on new road and facility construction may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk.

Oil and Gas. Federal oil and gas estate would be open to leasing. Within crucial deer and elk winter range (37,007 acres of federal surface and 8,850 acres of split-estate), seasonal stipulations on seismic and drilling activities would be in effect from December 1 through April 30 to reduce stress on wintering deer and elk. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials. Within crucial deer and elk winter range, seasonal restrictions on disposal activities may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk.

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigation measures would be incorporated into new wildlife habitat management plans (HMPs). Land treatment and erosion control projects would be permitted if they would be compatible with wildlife habitat management objectives.

Livestock Grazing. Livestock grazing would continue at current forage allocation levels and seasons of use unless studies determine adjustments are needed. Livestock would have first priority for all additional forage made available as a result of livestock operator-funded rangeland improvement projects. Non-conflicting livestock management objectives, projects, and mitigating measures would be incorporated into new wildlife HMPs. Facility development and land treatment projects would be permitted if they would be compatible with wildlife habitat management objectives.

Forestry. The management unit would be available for woodland product harvests. On 37,007 acres of crucial deer and elk winter range, seasonal restrictions on harvests may be necessary from December 1 through April 30 to reduce stress on wintering deer and elk. Woodland harvests would be designed to increase forage production and would be compatible with wildlife habitat management objectives.

Off-Road Vehicles. A total of 2,482 acres in the Camel Back/upper Roubideau Creek drainage area would be closed to ORV use. Vehicle use in the remainder of the management unit would be limited to designated roads and trails from December 1 through April 30. Variances to this seasonal

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limitation may be granted if ORV use would not result in any negative impacts on wintering deer and elk.

Visual Resources. The management unit would be managed under VRM Class III guidelines.

Major Utilities. The management unit would be open to development of major utility facilities. Within crucial deer and elk winter range, construction activities may be restricted from December 1 through April 30 if necessary to reduce stress on wintering deer and elk.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of crucial deer and elk winter range may be acquired through exchange.

Access. Public access would be acquired into the McDonald Mesa, Roatcap-Jay Creek, Spaulding Peak/Dry Creek, Oak Mesa, and Oak Ridge areas for hunting and other recreational uses, wildlife habitat management, and timber and woodlands management.

Fire Management. A total of 53,502 acres of public surface would be managed under the fire suppression category, with 48,118 acres identified for intensive suppression and 5,384 acres identified for conditional suppression. A total of 13,818 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed in these areas.

MANAGEMENT UNIT 3

47,607 Acres of Public Surface; 10 percent of the Planning Area

Management Unit 3 consists of 47,607 acres of public land located primarily on the northeast-facing slopes of the Uncompahgre Plateau. The management unit contains some of the most productive pinyon-juniper woodland sites in the planning area which are used extensively for livestock grazing and are valuable deer and elk habitat.

The management unit would be managed for sustained yield production of the woodland resource within the allowable cut restrictions determined by the TPCC inventory (23,206 acres).

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect on crucial deer and elk winter range (28,552 acres of federal surface and 25 acres of split-estate) from December 1 through April 30 if necessary to reduce stress on wintering deer and elk. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Soils and Water Resources. Non-conflicting erosion control objectives, projects, and mitigating measures would be incorporated into new forest management plans (FMPs). Existing erosion control projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new FMPs. Existing wildlife habitat projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Livestock Grazing. Non-conflicting livestock grazing management objectives, projects, and mitigating measures would be incorporated into new FMPs. Existing livestock projects would be maintained and new projects would be developed if they would not decrease the woodland base.

Off-Road Vehicles. The management unit would be open to ORV use except in crucial deer and elk winter range (28,552 acres) where vehicle use would be limited to designated roads and trails from December 1 through April 30 if necessary to reduce stress on wintering deer and elk. Use of ORVs for woodland management and harvest purposes would be authorized year-round.

Access. Public access would be acquired into the Beaver Hill and Linscott Canyon areas for woodland harvest and recreation purposes.

Fire Management. A total of 25,162 acres of public land would be managed under the fire suppression category, with 21,187 acres identified for intensive suppression and 3,975 acres identified for conditional suppression. A total of 22,445 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 4

40,792 Acres of Public Surface; 8 percent of the Planning Area

Management Unit 4 consists of the 40,792 acres of public lands surrounding the Gunnison Gorge. The management unit is characterized by a diversity of landscapes and high-value recreation opportunities. The need to protect both the quality and diversity of recreation opportunities and to facilitate recreation use would be recognized as important during the formulation of management decisions affecting the area.

The management unit would be managed as the Gunnison Gorge Special Recreation Management Area (SRMA). Maps, interpretive materials, and facilities would be developed. Recreation use would be monitored and possibly

restricted as necessary to protect natural features and recreation opportunities.

Lands in the Peach Valley area (15,610 acres) would be managed for ORV recreation opportunities. A minimum of restrictions would be placed on surface-disturbing activities and a high concentration of recreation users would be permitted within this area.

Motorized access to the remainder of the management unit (25,182 acres) would be restricted to designated roads, the majority of which are primitive in character. This area would be managed to maintain a predominantly natural environment with low but evident human concentrations and impacts.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on crucial deer and elk winter range (8,077 acres of federal surface and 280 acres of split-estate). Variances in this seasonal restriction may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. Federal mineral estate would be open to entry and location. The BLM protective withdrawal (P.L.O. 5261; September 15, 1972) would be revoked and the BOR withdrawal on Fruitland Mesa would be recommended for revocation. Revoking these mineral withdrawals would allow for mineral exploration and development, facilitate resource management, and permit long-term land use planning.

Soils and Water Resources. The Elephant Skin Wash salinity control project would be maintained to reduce saline runoff. Elephant Skin Wash would be protected from surface-disturbing activities.

Wildlife Habitat. Bighorn sheep habitat in the Smith Fork Canyon (2,250 acres) would be monitored and protected. Activities and land uses that are consistent with maintaining the necessary forage and isolated habitat requirements of bighorn sheep would be permitted.

Livestock Grazing. Livestock grazing would continue at current forage allocation levels and seasons of use unless studies indicate that adjustments are needed. The 140-acre Gunnison Forks habitat management area would remain unallotted for livestock grazing. Livestock forage utilization would be limited to 35 percent in the Elephant Skin Wash area (2,370 acres) as necessary to protect soils by maintaining an optimum basal ground cover.

Forestry. A 1,255-acre portion (in the Black Ridge area) of the 2,500 acres of harvestable woodlands within the management unit would be available for management and harvest. This area would be closed to harvest from December 1 through April 30 to protect crucial deer and elk winter range. The remaining harvestable woodlands (1,245 acres)

would be managed for scenic and relic-area values and would not be harvested.

Off-Road Vehicles. A total of 15,610 acres in the Peach Valley area would be open to ORV use. To protect natural and scenic values, vehicle use in the Elephant Skin Wash area and the remainder of the management unit would be limited to designated roads and trails yearlong.

Visual Resources. The 15,610 acres open to ORV use would be managed under VRM Class IV guidelines.

Major Utilities. A total of 2,462 acres in the Smiths Mountain and Gunnison Forks areas would be open to but not preferred for development of new major utility facilities. These lands could be utilized for major utility development if there are no feasible alternatives. The remainder of the management unit would be closed to new major utility development to protect natural and scenic values.

Acquisition of Non-Federal Lands. Actions would be initiated to acquire 2,200 acres of non-federal lands, as identified in the Gunnison Gorge Recreation Area Management Plan (RAMPA), that would be necessary to facilitate public access and enhance recreational values.

Access. Public access would be acquired along the Gunnison Gorge rim southwest of the Gunnison Forks and from Colorado Highway 92 to the Gunnison River in the Austin area for recreation purposes.

Fire Management. A total of 26,070 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas. A total of 14,722 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 5

24,177 Acres of Public Surface; 5 percent of the Planning Area

Management Unit 5, totalling 24,177 acres, consists of Mancos shale hills commonly known as the "adobes". These highly erodible soils, combined with a lack of protective vegetation, can produce sediment loads in local watersheds that are high in salinity. High precipitation runoff rates from the adobes contribute to overall salinity levels in the Upper Colorado River Basin. Salinity yields are increased within localized areas due to increased erosion from surface-disturbing activities including ORV use and livestock grazing.

The management unit would be managed to reduce salinity loads in the Upper Colorado River Basin. In-channel structures and land treatment projects designed to reduce runoff, erosion, and sedimentation would be developed, and

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surface protection measures would be implemented. Forage utilization would be managed to achieve the basal ground cover objectives identified in Table 6. Surface-disturbing activities would be curtailed from March 1 through May 31 when saturated soils are most vulnerable to damage. Activities and other land uses which are consistent with maintaining the soil and vegetative conditions necessary to reduce erosion and salt contributions to the river basin would be permitted.

Table 6
OBJECTIVES FOR PERCENT
GROUND COVER WITHIN
MANAGEMENT UNIT 5

| RANGE SITE | LOCATION | PERCENT BASAL GROUND COVER |
|--------------------|--------------------|-------------------------------|
| Stony salt desert | North of Delta | 10 |
| Clayey salt desert | South of Hotchkiss | 10 |
| Salt flats | South of Hotchkiss | 7 |
| Clayey salt desert | Bone Mesa | 10 |

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from March 1 through May 31 to protect erodible and saline soils on 24,177 acres of federal surface and 4,155 acres of split-estate. Variances to this seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Mineral Materials. Federal mineral estate would be open to mineral material activities except from March 1 through May 31 if necessary to protect wet soils.

Livestock Grazing. Livestock grazing would be allowed except from March 20 to range readiness to protect plant species during the spring growth period, and to prevent soil disturbance when saturated soils are most vulnerable to damage. If the basal ground cover is less than the objectives identified in Table 6 livestock forage utilization would be managed at 35 percent of key forage species to increase basal ground cover.

Off-Road Vehicles. To protect highly saline soils, vehicle use in the entire management unit would be limited to designated roads and trails yearlong.

Major Utilities. The management unit would be open to development of major utility facilities but no surface-disturbing activities would be permitted from March 1 through May 31 if necessary to protect wet soils.

Fire Management. A total of 22,992 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas. A total of 1,185 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 6

21,038 Acres of Public Surface; 4 percent of the Planning Area

Management Unit 6 is the Gunnison Gorge WSA (CO-030-388). The WSA, totalling 21,038 acres, would be recommended as preliminarily suitable for wilderness designation. Until a final decision on wilderness designation or non-designation is made, the Gunnison Gorge WSA would be managed according to the Wilderness Interim Management Policy and the Gunnison Gorge RAMP.

During the wilderness intensive inventory, the Gunnison Gorge was determined to meet the wilderness size requirement of at least 5,000 acres, to be natural, and to provide outstanding opportunities for solitude and primitive/unconfined recreation. The scenic and wilderness canyon complex of the area has received considerable publicity and public interest. If designated as wilderness by Congress, activities and land uses that are consistent with preserving the natural condition and wilderness character of the area would be permitted.

Air Quality. The management unit would be managed within federal air quality Class II guidelines unless the State of Colorado reclassifies the area, or other areas, as a result of procedures prescribed in the Clean Air Act as amended in 1977. Under other state authorities, the Gunnison Gorge WSA is currently managed as a Category I area where more restrictive sulfur dioxide requirements apply.

Oil and Gas. Federal oil and gas estate would be closed to future leasing. There are no pre-FLPMA leases in the WSA. Development of any post-FLPMA leases would be permitted only if activities would result in no impairment of wilderness characteristics.

Locatable Minerals. The management unit would be closed to mineral entry and location except for pre-FLPMA claims determined to have valid discoveries. The majority of the area (74 percent) is presently withdrawn from mineral entry.

Mineral Materials. The management unit would be closed to disposal of mineral materials.

Soils and Water Resources. Where natural recovery is unlikely, deteriorated watershed conditions would be restored if life, property, or wilderness values are threatened, or if serious depreciation of important environmental

qualities outside the wilderness area is evident. Revegetation efforts would be limited to use of native or naturalized species. Whenever feasible, non-motorized access and project development methods would be required. Approval of the BLM Director would be required for all watershed restoration projects.

Threatened and Endangered Species. Threatened and endangered species research and habitat improvement would be permitted if activities are consistent with protection of wilderness values. Habitat would be managed for federally-listed bald eagles and peregrine falcons and state-listed river otters. Recreation use would be restricted if necessary for the protection of threatened and endangered species.

Wildlife Habitat. Wildlife habitat would be managed to allow for natural distribution, numbers, and interaction of indigenous wildlife and fish species. Developed facilities, if necessary for the continued existence or welfare of a wildlife species, would be permissible if wilderness characteristics would not be impaired. Bighorn sheep habitat and deer and elk winter range would be managed in cooperation with the Colorado DOW. Supplemental releases of bighorn sheep would be permitted as identified in the 1986 reintroduction plan or its future amendments.

Livestock Grazing. Livestock grazing and facility maintenance would be managed at levels and conditions established prior to wilderness designation. New rangeland improvements would be permissible if determined to be necessary for rangeland and/or wilderness protection.

Forestry. Woodland harvest and/or management would be permitted only for control of insects and disease if determined necessary to protect resources outside the management unit. There is a total of 337 acres of productive woodlands within the WSA that would be unavailable for management and harvest.

Recreation. Recreation use would be regulated as necessary to protect wilderness values. Highest priority would be given to low-impact recreation activities that could not be accommodated outside the wilderness environment. Opportunities for non-motorized recreation in a predominantly natural environment would be maintained. Facilities, improvements, and signs would be limited to those necessary to protect wilderness resources along with public health and safety. Permits would be required for all commercial recreation uses and, if necessary to protect wilderness values, for all non-commercial recreationists. Hunting, fishing, and recreational trapping would be permitted.

The river corridor would be managed to maintain very low human group concentrations and little overall evidence of human use. River-boating use would be limited to six to ten group encounters per day with no more than one commercially-outfitted trip allowed per day. Allocations between private and commercial river-boating use would

be made if necessary to protect wilderness values or to emphasize opportunities for specific recreational experiences such as self-reliance as opposed to guided and outfitted experiences.

Off-Road Vehicles. Vehicle use in general would be eliminated from the management unit. Vehicle use would be permitted in certain circumstances involving valid existing rights, livestock grazing, fire suppression, life-threatening emergencies, and wilderness area administration. The rugged canyon area has few vehicular access routes.

Cultural and Paleontological Resources. In most instances, cultural and paleontological resources would be subject to the forces of nature in the same manner as other wilderness resources. Study or management would not entail excavation, stabilization, or interpretation. Exceptions may be granted by the BLM State Director for unusually significant cultural or paleontological resources.

Visual Resources. The management unit would be managed under VRM Class I guidelines.

Major Utilities. The management unit would be closed to development of utility facilities. The area is not within the lands identified as needed for future major utility development in the 1980 and 1985 Western Regional Utility Corridor Study(s).

Hydroelectric Development. Several hydroelectric projects have been proposed for development on the Gunnison River which would be within or affect the WSA. Temporary protective withdrawals have disallowed major on-the-ground evaluations by the proponents. The President has compatibility decision authority between the wilderness and the prospecting for hydroelectric sites, and BLM recommends that he recommend to Congress the unsuitability of actual dams or construction of dams in the wilderness designation.

BLM recommends the revocation of BOR withdrawals. However, if BOR determines that the withdrawal is still needed for Reclamation purposes, the withdrawal will be continued.

Access. Public access to the WSA boundary in the Red Canyon area would be identified for acquisition.

Agricultural Development. No agricultural or related development would be permitted within the management unit. The BLM would recommend revocation of the portion of the BOR Fruitland Mesa withdrawal that is within the WSA.

Fire Management. A total of 21,038 acres would be managed under the fire-use category where fire would be utilized as a management tool. Only natural ignitions meeting pre-determined prescriptions would be allowed in this area.

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MANAGEMENT UNIT 7

17,232 Acres of Public Surface; 4 percent of the Planning Area

Management Unit 7 consists of 54,474 acres of federal coal estate within the planning area and 1,756 acres of federal coal estate outside of the planning area. A 17,232-acre portion of this federal coal estate underlies federal surface estate.

The management unit would be managed for both existing and potential coal development. Development of existing coal leases would continue, and unleased federal coal would be identified as acceptable for further coal leasing consideration with a minimum of multiple-use restrictions. Activities and land uses that are consistent with maintaining existing coal operations and the potential for coal development would be permitted.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on 1,730 acres (federal surface) of crucial deer and elk winter range, and on 1,637 acres of federal surface and 630 acres of split-estate lands used as hunting habitat by bald eagles. Variances in these seasonal stipulations may be granted on a case-by-case basis (see Appendix A).

Riparian/Aquatic Systems. Riparian/aquatic zones up to one-quarter mile wide would be protected. Activities that disturb these areas could be approved on a site-specific basis after consultation with affected entities and development of mitigating measures.

Wildlife Habitat. Wildlife would have priority for forage allocations on crucial deer and elk winter range (1,730 acres).

Forestry. All commercial forest lands and pinyon-juniper woodlands that are suitable for harvest would be managed for sustained yield production within allowable cut restrictions determined by the TPCC inventory.

Off-Road Vehicles. Vehicle use in the riparian zones associated with Bear and Roatcap creeks would be limited to designated roads and trails yearlong. Vehicle use in crucial deer and elk winter range (1,730 acres) would be limited to designated roads and trails from December 1 through April 30. This seasonal ORV designation would be subject to change on a site-specific basis if mild winter conditions eliminate the need for protection of a crucial winter range.

Major Utilities. Corridors one-quarter mile wide and located on each side of Colorado Highway 133 would be open to development of major utility facilities. The remainder of the area would be closed to major utility facilities except for those needed for coal development. Within the management unit, 83 percent of the public lands that are identified as needed for future major utility development would be closed to this type of development. This

management would greatly reduce the long-term conflicts between new utility facilities and the potential surface effects of coal mine subsidence.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of riparian zones along with crucial deer and elk winter range would be acquired through exchange only.

Fire Management. A total of 14,910 acres of public land would be managed under the fire suppression category and identified as intensive suppression areas. A total of 2,322 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on this area.

MANAGEMENT UNIT 8

8,942 Acres of Public Surface; 2 percent of the Planning Area

Management Unit 8 is 8,942 acres of public land northeast of Delta that consists of Mancos shale (adobe badlands) hills with little vegetative cover. The area is suitable and utilized for ORV recreation. ORV activities typically involve local residents and occur during the spring, fall, and winter.

The management unit would be managed as open to ORV use. Recreational and competitive ORV use and a high concentration of recreation users would be permitted within the management unit. Facilities such as informational signs and motorcycle loading ramps could be developed if constructed and maintained to BLM standards by local ORV organizations. A minimum of restrictions would be placed on surface-disturbing activities that do not impede or endanger ORV recreationists.

Prior to management of the area for ORV use, an inventory will be conducted to identify threatened and endangered plant populations. The management unit's proposed boundary will be adjusted to exclude threatened and endangered plants. If plants or plant communities cannot be excluded from the management unit, protective fencing or other measures will be implemented to protect the plants. The USFWS will be consulted.

Livestock Grazing. Grazing use would continue in the management unit but construction of facilities, such as livestock control fences, that create safety hazards or impede free vehicle use would not be permitted.

Visual Resources. The management unit would be managed under VRM Class IV guidelines.

Major Utilities. The management unit would be open to development of major utility facilities.

Fire Management. A total of 8,942 acres of public land would be managed under the fire suppression category and identified as conditional suppression areas.

MANAGEMENT UNIT 9

6,320 Acres of Public Surface; 1 percent of the Planning Area

The public land riparian zones that comprise Management Unit 9 occur throughout the planning area and are generally associated with perennial or intermittent streams. These areas (6,320 acres) have a very high productive capability and are very important in maintaining the water quality of the adjacent streams.

The management unit would be managed to restore and enhance riparian vegetation along 40 miles of streams. Objectives and projects designed to accelerate improvement of species diversity, streambank cover and stability, and instream structure, and to raise the water table would be incorporated into existing activity plans or developed in new riparian/aquatic system management plans. All areas would be intensively monitored for vegetation, aquatic habitat, and erosion conditions.

Coal. Coal development would be considered on a site-specific basis after consultation with affected entities and formulation of mitigating measures.

Mineral Materials. Federal mineral estate would be closed to disposal of mineral materials except for sales which would result in negligible or no impacts to the riparian and aquatic systems.

Soils and Water Resources. Non-conflicting erosion control and water quality improvement objectives and projects would be incorporated into new riparian/aquatic system management plans.

Wildlife Habitat. Non-conflicting wildlife habitat management objectives, projects, and mitigating measures would be incorporated into new riparian/aquatic system management plans.

Livestock Grazing. Livestock grazing use would be permitted in riparian zones except from March 1 through range readiness, during which time it would be eliminated to accelerate improvement of riparian vegetation. To improve the condition of riparian zones, management practices and principles would be established in activity plans. Utilization of 35 percent by weight of key forage species will be used as a general guidance for improvement; this may vary depending on the individual riparian system. Trailing use would be limited as much as possible and confined to established roads, and trailing livestock would not be permitted to bed in riparian zones unless absolutely necessary.

Forestry. Woodland product harvests would not be permitted in the management unit.

Off-Road Vehicles. A total of 680 acres in Roubideau and Potter creeks would be closed to ORV use. Vehicle use in the remainder of the management unit would be limited to designated roads and trails yearlong.

Major Utilities. The management unit would be open to development of major utility facilities. Surface-disturbing activities which would have long-term adverse effects on riparian/aquatic systems would be prohibited.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary for effective management of riparian/aquatic systems would be acquired through exchange only.

Access. Public access would be acquired into the Terror Creek area for project development and recreation purposes. The Potter Creek road (five miles) and the Dry Fork of Escalante Creek road (two miles) would be closed and rehabilitated and removed from the transportation plan.

Fire Management. A total of 3,082 acres of public land would be managed under the fire suppression category, with 1,607 acres identified for intensive suppression and 1,475 acres identified for conditional suppression. A total of 3,238 acres would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed on these areas.

MANAGEMENT UNIT 10

3,292 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 10 consists of two tracts in the High Park/Storm King Peak area 20 miles southeast of Montrose. The management unit (3,292 acres of public land) ranges from 8,500 feet to over 10,000 feet in elevation, and is used extensively as an elk calving area in the spring. The largest commercial timber stands in the planning area exist in this unit.

The management unit would be managed to enhance its use as an elk calving area. Any disturbance during the calving season (May 1 through June 15) would be limited as much as possible. Habitat in elk calving areas would be improved, and wildlife would have first priority for allocation of new forage.

Oil and Gas. Federal oil and gas estate (3,292 acres of federal surface and 1,423 acres of split-estate lands) would be open to leasing with a seasonal stipulation on seismic and drilling activities in effect from May 1 through June 15 to prevent disturbance of calving elk. Variances to this

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seasonal stipulation may be granted on a case-by-case basis (see Appendix A).

Soils and Water Resources. Stipulations designed is used extensively as an elk calving area in the spring. The largest commercial timber stands in the planning area exist in this unit.

Forestry. Skid trails and other roads would be closed and rehabilitated; main haul roads would remain available for public use.

Off-Road Vehicles. The management unit would be open to ORV use except during the elk calving season when all roads would be closed. Access for maintenance of the existing communications site would be permitted at all times.

Major Utilities. Public lands would be open to development of major utility facilities but no surface-disturbing activities would be permitted during the elk calving season.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would expand elk calving areas and improve extensive recreational opportunities would be acquired through exchange only.

Access. Public access would be acquired into the Storm King and High Park areas for timber harvest and extensive recreation purposes.

Fire Management. A total of 3,292 acres of public land would be managed under the fire suppression category and identified as intensive suppression areas.

MANAGEMENT UNIT 11

1,990 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 11 is comprised of 1,990 acres of public land adjacent to the Gunnison River west of Delta. It adjoins the Escalante State Wildlife Area which is administered by the Colorado DOW. The management unit presently receives considerable use by waterfowl as nesting and resting habitat. Additional management and minor developments could enhance its potential for increased use as waterfowl habitat.

The management unit would be managed as waterfowl habitat. Adequate cover, wetlands, and nesting structures would be provided. Disturbance would be minimized during the breeding and nesting season (March 15 through June 30). Activities and land uses that are consistent with maintaining waterfowl habitat characteristics would be permitted. The BLM would coordinate management of the area with the DOW.

Oil and Gas. Federal oil and gas estate (1,990 acres of federal surface and 150 acres of split-estate lands) would

be open to leasing with seasonal stipulations on seismic and drilling activities in effect from March 15 through June 30 to protect waterfowl habitat, and from December 1 through April 30 on habitat used for hunting by bald eagles. Variances to the seasonal stipulations may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The BOR withdrawal and the BLM powersite classifications in this management unit would be recommended for revocation and opening to permit mineral exploration and development, facilitate resource management, and permit long-term land use planning. Federal mineral estate would be opened to entry and location.

Mineral Materials. Federal mineral estate would be open to disposal of mineral materials except during the waterfowl nesting season.

Acquisition of Non-Federal Lands. If they are available, non-federal lands that would be necessary to increase waterfowl habitat and facilitate development and management of the area would be acquired through exchange only.

Fire Management. The entire management unit (1,990 acres) would be managed under the fire suppression category and identified as a conditional suppression area.

MANAGEMENT UNIT 12

1,895 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 12 is 1,895 acres of public land in Escalante Canyon approximately six miles southwest of the Gunnison River. Several listed plant species and two unique plant associations occur in the management unit. The area also receives significant recreational use due to its scenic qualities and the presence of eroded potholes in Escalante Creek.

The management unit would be designated as the Escalante Canyon Area of Critical Environmental Concern (ACEC). This designation would enhance management and protection of the listed plant species and unique plant associations, and would improve the public's awareness of the recreational hazards of the Escalante Potholes. Plant monitoring studies would be developed and activities designed to improve these plants' habitat conditions would be initiated. Surface-disturbing activities would be restricted. Informational signs identifying potential recreational hazards would be provided. Camping would be limited to designated areas.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would be withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials to protect the potential habitats of listed species and unique plant associations.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species and unique plant associations or their potential habitats are being degraded.

Forestry. To prevent accidental destruction of listed species and unique plant associations, woodland harvests would not be permitted.

Off-Road Vehicles. To prevent accidental destruction of listed species and unique plant associations, vehicle use within the management unit would be limited to designated roads and trails yearlong.

Visual Resources. The management unit would be managed under VRM Class II guidelines to maintain its scenic qualities.

Major Utilities. The management unit would be closed to development of major utilities to prevent accidental destruction of listed species and unique plant associations, and to maintain its scenic qualities.

Fire Management. All 1,895 acres of public surface in the management unit would be managed under the fire-use category where fire would be utilized as a management tool. Planned or natural ignitions meeting pre-determined prescriptions would be allowed.

MANAGEMENT UNIT 13

377 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 13 consists of two tracts totalling 377 acres of public land eight miles east of Montrose. The smaller tract is north of Highway 50 and the larger tract is south of the highway. The tracts contain the largest population of the endangered clay-loving wild buckwheat in the planning area and also have significant populations of Montrose penstemon, a candidate species.

The management unit would be designated as the Fairview Research Natural Area, an area of critical environmental concern (RNA/ACEC). Plant monitoring studies would be developed in cooperation with the Colorado Natural Areas Program and actions designed to improve habitat conditions would be initiated. Surface-disturbing activities would be restricted to protect the threatened and endangered species and their potential habitat.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would be withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials to prevent accidental destruction of threatened or endangered plant species or their potential habitat.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species or their potential habitats are being degraded.

Off-Road Vehicles. To prevent accidental destruction of threatened or endangered plant species or their potential habitat, the management unit would be closed to ORV use.

Major Utilities. The management unit would be open to development of major utility facilities, except pipelines, so long as there would be no disturbance of threatened or endangered plant species or their potential habitat.

Fire Management. The management unit (377 acres) would be managed under the fire suppression category and identified for conditional suppression.

MANAGEMENT UNIT 14

80 Acres of Public Surface; less than 1 percent of the Planning Area

Management Unit 14 is an 80-acre site consisting mainly of a volcanic structure with high-value scientific, interpretive, and scenic characteristics. A shelter facility and interpretive nature trail have been developed in the area. Needle Rock is part of the Colorado Natural Areas Program and is one of the significant public land geologic features in Colorado as identified by the BLM's Geologic Advisory Group.

The management unit would be designated as the Needle Rock Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). This designation would preclude all surface-disturbing activities that are not consistent with management of the area for natural, scenic, and educational values. The area would be managed to protect these values and for recreation opportunities (sightseeing, picnicking, and geologic study) in a roaded but natural environment. A management plan would be developed following designation.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Locatable Minerals. The management unit would remain withdrawn from entry and location for locatable minerals.

Mineral Materials. The management unit would be closed to disposal of mineral materials.

Livestock Grazing. The management unit would remain unallotted for livestock grazing use.

Off-Road Vehicles. Vehicle use within the management unit would be limited to designated roads and trails yearlong.

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Visual Resources. The management unit would be managed under VRM Class I guidelines.

Major Utilities. The management unit would be closed to development of major utility facilities.

Fire Management. The entire management unit would be managed under the fire suppression category and identified as an intensive suppression area.

MANAGEMENT UNIT 15

6,783 Acres of Public Surface; 1 percent of the Planning Area

Management Unit 15 consists of 6,783 acres of public land approximately three miles northwest of Delta, Colorado. This area, commonly known as "the adobes", consists of Mancos shale hills and flats which, through wind and water erosion, have formed unique scenic formations. The unit's soils are highly erodible and saline. Spring and summer storms frequently result in high sediment loads and very saline runoff.

The management unit also contains populations of the threatened Uinta Basin hookless cactus and is potential habitat for the endangered clay-loving wild buckwheat and the candidate Montrose penstemon.

The management unit would be designated as the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC). The area would be managed to protect its unique scenic qualities and threatened and endangered species' habitats, and to reduce active erosion.

The management unit would be protected from surface-disturbing activities which would degrade the area's scenic qualities and accelerate erosion. A complete inventory for threatened and endangered species would be conducted. Forage utilization would be managed to achieve a basal ground cover of 10 percent.

Coal. Federal coal estate would be closed to leasing.

Oil and Gas. Federal oil and gas estate would remain open to leasing with a no surface occupancy stipulation.

Mineral Materials. The management unit would be closed to the disposal of mineral materials.

Soils and Water Resources. Erosion and salinity control measures would not utilize structures or land treatments which would alter scenic values.

Threatened and Endangered Species. A complete inventory for threatened and endangered species would be conducted. Research and monitoring studies would be established.

Wildlife Habitat. Wildlife forage allocations would remain at current levels. No additional forage allocations would be made. To protect scenic values, no new habitat improvement projects or maintenance of existing projects would be permitted.

Livestock Grazing. Livestock grazing would continue at current levels unless studies determine threatened and endangered plant species or their potential habitat are being degraded. If basal groundcover is less than 10 percent, livestock forage utilization would be managed at 35 percent utilization of key forage species. No additional forage allocations would be made. To protect scenic values, no new livestock improvement projects or maintenance of existing projects would be permitted.

Recreation. The unit would be managed for primitive non-motorized recreational use.

Off-Road Vehicles. The unit would be closed to ORV use to protect the scenic qualities and to prevent accidental destruction of threatened and endangered plant species and their potential habitat.

Visual Resources. To maintain its scenic qualities, the unit would be managed under VRM Class I guidelines.

Major Utilities. The unit would be closed to the development of major utility facilities to prevent accidental destruction of threatened and endangered species and to maintain its scenic qualities.

Fire Management. The unit would be managed under the fire suppression category and identified for conditional suppression.

MANAGEMENT UNIT 16

48,422 Acres of Public Surface; 10 percent of the Planning Area

In general, the public lands in Management Unit 16 (48,422 acres) would be managed according to the policy assumptions and standard resource program management guidance developed for this Proposed Plan. No single resource or resource use would have management priority. No activity plans would be written and no major BLM-funded projects or facilities would be developed within this area. Habitat, vegetation, and other resource studies would be minimal. Specific resource management in this area would be prescribed as follows.

Oil and Gas. Federal oil and gas estate would be open to leasing. A seasonal stipulation on seismic and drilling activities would be in effect from December 1 through April 30 on 1,042 acres of federal surface along the Gunnison and North Fork of the Gunnison rivers that are used by bald eagles as hunting habitat. Variances to the seasonal

PROPOSED PLAN

stipulation may be granted on a case-by-case basis (see Appendix A).

Locatable Minerals. The BOR withdrawals on Fruitland Mesa and along the Gunnison River downstream of Delta would be recommended for revocation to allow for mineral exploration and development, facilitate resource management, permit long-term land use planning, and allow for disposal of 806 acres of public land on Fruitland Mesa. Withdrawals on all other lands identified for disposal would be recommended for revocation. Portions of withdrawals in the management unit would be affected, including those associated with 108 acres of the Paonia Project, 37 acres of the Gunnison/Arkansas Project, 72 acres of the Uncompahgre Valley Project, and 25 acres along the East Canal. Federal mineral estate would be open to entry and location after a withdrawal is revoked.

Forestry. The reserved federal timber (123 acres) on 160 acres of land deeded to the Girl Scouts of America would be removed from the timber base and not considered for harvest. The management and harvest of this timber would be inconsistent with use of the land as a Girl Scout camp.

Off-Road Vehicles. Public lands within the management unit would be open to ORV use.

Fire Management. A total of 48,422 acres of public land would be managed under the fire suppression category, with 12,401 acres identified for intensive suppression and 36,021 acres identified for conditional suppression.



COMPARISON OF THE PROPOSED PLAN AND THE MANAGEMENT ALTERNATIVES

Table 7 is a composite summary of the data presented in the prescriptions for the Continuation of Current Management Alternative, the Production Alternative, the Conservation Alternative (all of which are described in Chapter Three of the Draft RMP/EIS), and the Proposed Management Plan. The table summarizes by resource or

resource use the major land use allocations that would be made under each management alternative and under the proposed plan. The purpose of this comparison is to identify major differences between the alternatives and the proposed plan, and to provide a clearer basis for management recommendations.

Table 7

COMPARISON OF THE RESOURCE MANAGEMENT ALTERNATIVES AND THE PROPOSED RESOURCE MANAGEMENT PLAN

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|---|--|---|--|--|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| COAL | Allow coal development on all areas not excluded from leasing. Consider coal leasing on a demand basis; apply unsuitability criteria and resource screening. | Continue with 26 existing coal leases on 26,663 acres and identify 20,737 acres of federal coal estate in the Paonia/Somerset and Cimarron Ridge coal areas as acceptable for further leasing for maintenance and emergency purposes. | Continue with 26 existing coal leases on 26,663 acres and identify 83,334 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing with limited stipulations. | Continue with 26 existing coal leases on 26,663 acres and identify 82,827 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing. A no surface disturbance restriction would apply on 6,288 acres of public land and restrictions on surface disturbance and on subsidence activities would apply on another 1,525 acres. | Continue with 26 existing coal leases on 26,663 acres and identify 83,334 acres of federal coal estate in the Paonia/Somerset, Cimarron Ridge, and Bookcliffs coal areas as acceptable for further coal leasing with limited stipulations. |
| OIL, GAS, AND GEOTHERMAL RESOURCES | Allow development of oil, gas, and geothermal resources on all areas not excluded from leasing. | Allow leasing of oil, gas, and geothermal resources on 445,364 acres with standard lease terms; on 31,200 acres on a case-by-case basis; on 220 acres with a no surface occupancy stipulation; and on 229,950 acres with seasonal stipulations. | Allow leasing of oil, gas, and geothermal resources on 706,654 acres with standard lease terms. The Needle Rock ONA/ACEC (80 acres) would be managed with a no surface occupancy stipulation. | Allow leasing of oil, gas, and geothermal resources on 367,488 acres with standard lease terms; on 29,915 acres with a no surface occupancy stipulation; and on 267,466 acres with seasonal stipulations. Three areas recommended as wilderness (41,865 acres) would be closed to leasing. | Allow leasing of oil, gas, and geothermal resources on 484,349 acres with standard lease terms; on 9,135 acres with a no surface occupancy stipulation; and on 192,212 acres with seasonal stipulations. The Gunnison Gorge WSA (21,038 acres), recommended as wilderness, would be closed to leasing. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|--|---|---|--|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| LOCATABLE MINERALS | Allow development of locatable minerals on all areas not closed to mineral entry and location. | Allow mineral entry and location on 615,892 acres. Current withdrawals totaling 59,250 acres are closed to entry and location. | Recommend revocation of all withdrawals on public lands (59,250 acres) and allow entry and location on the entire federal mineral estate (675,142 acres). | Recommend retention of all existing withdrawals (59,250 acres); withdraw an additional 39,602 acres from entry; allow entry and location on the remaining federal mineral estate (576,290 acres). | Recommend retention of all existing withdrawals on 9,440 acres; close the Gunnison Gorge WSA, the Escalante Canyon ACEC and the Fairview RNA/ACEC to mineral entry and location (23,310 acres); allow entry and location on the remaining federal mineral estate (642,392 acres). |
| 107 MINERAL MATERIALS | Allow disposal of mineral materials on all areas not excluded or withdrawn. | Allow disposal of mineral materials on all public lands with federal mineral estate (480,805 acres). Disposal of mineral materials on 59,250 of these acres currently under withdrawal would require the approval of the withdrawing agency. Disposal of mineral materials would not be permitted on 220 acres. | Allow disposal of mineral materials on 480,945 acres with federal mineral estate. The Needle Rock ONA/ACEC (80 acres) would be closed to disposal of mineral materials. | Allow disposal of mineral materials on 396,264 acres with federal mineral estate. Disposal on 196,700 of these acres would be subject to seasonal restrictions. Disposal on 98,852 of these acres would require the approval of the withdrawing agency. Disposal would not be permitted on 84,761 acres. | Allow disposal of mineral materials on 444,532 acres with federal mineral estate. Disposal on 63,174 of these acres would be subject to seasonal restrictions. Disposal on 9,360 of these acres would require the approval of the withdrawing agency. Disposal would not be permitted on 36,493 acres. |
| SOILS AND WATER RESOURCES | Establish water quality studies throughout the planning area. | Continue intensive management and development of the Elephant Skin Wash watershed (2,370 acres) to control salinity. | No public lands would be intensively managed for salinity and/or erosion control. | Public lands totalling 21,615 acres would be intensively managed to control erosion and 26,580 acres would be intensively managed to control salinity. Projects and special protective measures would be developed. | Public lands totalling 26,547 acres, including the Elephant Skin Wash project, would be intensively managed to reduce salinity loads in the upper Colorado River. Appropriate projects and special protective measures would be developed. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|--|--|--|--|--|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | Require mitigation to minimize erosion and water quality deterioration in plans for surface disturbing activities. Maintenance of existing projects would have priority over implementation of new projects. | Projects would be developed to control salinity on 7,810 acres if compatible with livestock grazing use. Projects would be developed to reduce runoff, erosion, and sediment on 27,430 acres if compatible with livestock grazing use, crucial deer and elk winter range, and forest management. | Projects would be developed to control salinity on 29,978 acres and erosion on 21,703 acres if compatible with recreation, T&E species, and cultural resource management. | Projects would be developed to reduce runoff, erosion, and sediment on 47,260 acres if compatible with livestock grazing use, forest management, deer and elk winter range, and riparian habitat management. |
| 162 RIPARIAN ZONES | Continue to inventory and monitor riparian areas. | Improve the vegetation condition on 3,500 acres of riparian zones through decreased livestock utilization and trampling. Maintain riparian zones in the remainder of the planning area in their present condition. | Maintain riparian zones in the planning area in their present condition so long as it does not interfere with other resource uses and needs. | Improve the vegetation condition on 6,385 acres of riparian zones by implementing special protective and restorative measures. Maintain riparian zones in the remainder of the planning area in their present condition. | Improve the vegetation condition on 6,320 acres of riparian zones by implementing special protective and restorative measures. Maintain or improve riparian zones in the remainder of the planning area. |
| THREATENED AND ENDANGERED SPECIES | Continue to inventory and monitor T&E plant and animal habitats. Continue T&E clearances and Section 7 consultations with the USFWS. | Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities. Maintain suitable habitat for bald eagles and river otters in the Gunnison Gorge area. | Require minimal measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities. | Require additional measures beyond minimal requirements to protect T&E species, individuals, and habitats in plans for all surface disturbing activities. | Require measures to protect T&E species, individuals, and habitats in plans for all surface disturbing activities. Maintain suitable habitat for bald eagles, peregrine falcons, and river otters in the Gunnison Gorge area. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|---|--|--|--|---|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | | | Designate one ACEC and one RNA/ACEC, totalling 2,272 acres, for protection of T&E plants and unique plant associations. | Designate one ACEC, one RNA/ACEC, and one ONA/ACEC, totalling 9,055 acres for protection of T&E plants, unique plant associations, and identification of recreational hazards. |
| WILDLIFE HABITAT | Monitoring of both terrestrial and aquatic wildlife habitat would continue. In-channel structures and improvements to benefit aquatic wildlife habitat would be implemented. | Maintain big game forage allocations at present levels; future increases/decreases would be divided evenly between big game and livestock. Protect and mitigate wildlife habitat and improve browse condition on crucial deer and elk ranges. | Maintain big game forage allocations at present levels; no future additional forage would be allocated to big game. Non-conflicting wildlife habitat management objectives and projects would be incorporated into future livestock grazing and forest management plans. Existing wildlife projects would be maintained as long as the timber and woodland base on 27,522 acres would not be decreased. | Maintain big game forage allocations at present levels; all future additional forage would be allocated to big game. Intensively manage habitat and minimize disturbance on all crucial deer and elk winter ranges, elk calving areas (High Park), antelope ranges (Wells Gulch/Cactus Park), sage grouse habitats (Fruitland and Simms mesa), in several proposed waterfowl areas, and aquatic wildlife habitat in seven drainages. No vegetation manipulation would be permitted on 2,738 acres of cultural resource sites. | Maintain big game forage allocations at present levels. Big game would have priority for future additional forage on 72,342 acres; future additional forage on another 193,612 acres would be divided evenly between big game and livestock. No additional forage would be allocated on the Adobe Badlands ONA/ACEC (6,783 acres). Intensively manage habitat and minimize disturbance on 67,320 acres of important deer and elk winter range. Intensively manage and protect 3,292 acres in the Storm King Peak area for elk calving habitat. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|---|---|--|---|---|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area. | | Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area. | |
| | | Manage habitat in the Gunnison Gorge for 150 bighorn sheep. | Manage habitat in the Gunnison Gorge for 150 bighorn sheep. Allow re-introduction of bighorn sheep into the Camel Back area so long as livestock forage needs are not impacted. | Allocate forage, minimize disturbance, and manage habitat in the Gunnison Gorge and Camel Back areas for bighorn sheep. | Manage habitat and minimize disturbance in the Gunnison Gorge and Camel Back areas for bighorn sheep. |
| | | Continue management of the Gunnison Forks HMP area for fisheries and wildlife habitat benefits. | Revise the Gunnison Forks HMP to restrict ORV and other recreation use, and to accommodate livestock grazing and oil and gas activities. | Continue management of the Gunnison Forks HMP area for fisheries and wildlife habitat benefits. | Intensively manage and improve 1,990 acres along the Gunnison River for waterfowl habitat. Intensively manage 70 miles of streams for restoration and protection of aquatic habitats. |
| LIVESTOCK GRAZING | Develop AMPs for "I" category grazing allotments if no plan exists. Maintain existing AMPs on "M" "C" allotments. Continue monitoring on all allotments, with emphasis on "I" allotments. | Allow intensive management on 353,068 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 38,900 acres as "C" allotments. Manage 25,612 acres as unallotted; authorize no grazing use on currently unallotted areas. | Allow intensive management on 353,068 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 58,695 acres as "C" allotments (includes suitable existing unallotted areas). Manage 5,817 acres as unallotted areas. | Allow intensive management on 350,796 acres of "I" allotments; maintain current conditions on 65,497 acres of "M" allotments; manage 38,433 acres as "C" allotments. Manage 28,351 acres as unallotted; all unallotted areas would remain unallotted. | Allow intensive management on 336,562 acres of "I" allotments; maintain current conditions on 74,817 acres of "M" allotments; manage 39,033 acres as "C" allotments. Suitable unallotted public lands (26,873 acres) could be considered for grazing use authorizations except on areas where big game has priority for forage allocations. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|--|--|--|--|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | Manage at present forage allocation levels; future forage increases would be divided evenly between livestock and big game. | Manage at present forage allocation levels; future forage increases would be allocated to livestock. | Manage for no additional forage allocations to livestock. | Manage at present forage allocation levels. Future additional forage would be allocated to livestock on 186,810 acres, and divided evenly between livestock and big game on 193,612 acres. No additional forage would be allocated on the Adobe Badlands ONA/ACEC (6,783 acres). |
| | | Implement projects and land treatments to meet AMP objectives with restrictions protecting other resource needs. | Implement projects and land treatments to meet AMP objectives with minimal restrictions. | Land treatments and facility developments would be restricted on 124,963 acres. | Land treatments and facility developments would be restricted on 151,690 acres. |
| | | Livestock grazing use would be in accordance with the Uncompahgre Basin RPS and its updates. | Livestock grazing use would be restricted on adobe soils (9,201 acres) during the spring. | Livestock grazing use would be eliminated on 3,059 acres and restricted (season of use, utilization) on 75,626 acres. | No livestock grazing use would be allowed on 5,792 acres due to RMP decisions and unsuitability for grazing. Livestock grazing authorizations are unlikely on an additional 6,967 acres because of future wildlife forage needs. Livestock grazing would be restricted (season of use, utilization) on 39,590 acres. |
| FORESTRY | Manage both commercial forest and suitable woodlands for sustained yield production with harvest restrictions determined | Commercial forest on 3,482 acres (257 MBF/year) and suitable woodlands on 6,536 acres (327 cords/year) would be managed for sustained yield pro- | Commercial forest on 2,001 acres (148 MBF/year) and suitable woodlands on 7,072 acres (353 cords/year) would be managed for sustained yield pro- | Commercial forest on 2,251 acres (166.5 MBF/year) and suitable woodlands on 31,997 acres (1,600 cords/year) would be managed for sustained | Commercial forest on 3,127 acres (231.5 MBF/year) and suitable woodlands on 24,255 acres (1,213 cords/year) would be managed for sustained |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|--|--|---|---|---|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | by the TPC inventory. | duction. Seasonal restrictions would be applied on a case-by-case basis. | duction with no seasonal restrictions. | yield production. Seasonal restrictions would apply on 1,263 acres of commercial forest. | yield production. Seasonal restrictions would apply on 1,606 acres of commercial forest. |
| RECREATION | Manage the Gunnison Gorge SRMA in accordance with its RAMP. Continue to manage the Needle Rock ONA/ACEC and develop a management plan. | Continue management of the the Gunnison Gorge recreation area (61,067 acres) for motorized and non-motorized recreation opportunities. | Manage the inner Gunnison Gorge (21,038 acres) for intensive recreation use. | Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities. | Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities. |
| | | Manage whitewater boating use in the Gunnison Gorge for a maximum of 10 group encounters per day. Commercial overnight trips would be limited to 2 per day. Unrestricted day-use would not exceed 10 group encounters per day. | Manage whitewater boating use in the Gunnison Gorge for a maximum of 20 group encounters per day, with 8 overnight and 12 day-use permits issued daily (one-half commercial; one-half private). | Manage the Gunnison Gorge WSA (21,038 acres) for wilderness values and whitewater boating opportunities. Maximum boating use would be 6 group encounters per day, with 3 overnight and 3 day-use permits issued daily (one-third commercial; two-thirds private). | Until a decision is made on wilderness designation or non-designation, manage the Gunnison Gorge WSA (21,038 acres) for non-motorized recreation and whitewater boating opportunities. Boating use would be limited to 6 to 10 group encounters per day with no more than one commercial trip starting per day. |
| | | Manage the remainder of the planning area for extensive recreation use. | Manage the lower Gunnison River, below Escalante Bridge, as an SRMA and develop river access. | Manage the lower Gunnison River, below Escalante Bridge, as an SRMA for boating opportunities. | Manage the lower Gunnison River, below Escalante Bridge, for boating opportunities. |
| | | | Manage the remainder of the planning area for extensive recreation use. | Restrict recreation use to primitive walk-in access in the Escalante Canyon RNA/ACEC. | Manage and develop the Escalante Canyon ACEC for recreation use that does not conflict with T&E plants and unique plant associations. Manage the |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|--|---|---|---|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | | | <p>Manage the North Delta adobe area (8,942 acres) as an SRMA for ORV use.</p> <p>Manage the Storm King Peak area (1,520 acres) for possible development of a commercial ski area.</p> <p>Manage the remainder of the planning area for extensive recreation use.</p> | <p>Adobe Badlands ONA/ACEC for its scenic qualities and for non-motorized recreation opportunities.</p> <p>Manage the North Delta adobe area (8,942 acres) for ORV use.</p> <p>Manage the remainder of the planning area for extensive recreation use.</p> |
| OFF-ROAD VEHICLES | | A total of 444,521 acres would be open to ORV use and 21,038 acres would be closed to ORV use. Vehicle use would be limited to designated roads and trails on 17,518 acres. | A total of 208,952 acres would be open to ORV use and 35 acres would be closed to ORV use. Vehicle use on 49,840 acres would be limited to designated roads and trails yearlong and another 224,250 acres would have seasonal limited designations. | A total of 151,000 acres would be open to ORV use and 44,137 acres would be closed to ORV use. Vehicle use on 147,059 acres would be limited to designated roads and trails yearlong and another 140,881 acres would have seasonal limited designations. | A total of 224,276 acres would be open to ORV use and 38,600 acres would be closed to ORV use. Vehicle use on 56,974 acres would be limited to designated roads and trails yearlong and another 163,227 acres would have seasonal limited designations. |
| CULTURAL RESOURCES | Continue to inventory and monitor cultural resource sites; require clearances for all surface disturbing activities. | Perform necessary stabilization, restoration, and interpretation of sites in the Gunnison Gorge Recreation Area. | Conduct a Class III inventory on 2,738 acres. | Temporarily manage 2,738 acres as Current Scientific Use Areas. Allow no projects or land treatments. Conduct a Class III inventory and protect cultural values in | Conduct a Class III inventory on 5,848 acres. Some high-value sites could be assigned a long-term protective classification. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|------------------|--|---|---|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| | | | | the area. High-value sites would be assigned a long-term protective classification. | |
| VISUAL RESOURCES | | Visual resource management would be under current VRM classifications: Class I - 80 acres, Class II - 64,800 acres, Class III - 46,580 acres, Class IV- 371,617 acres. | Visual resource management would be: Class I - 80 acres, Class II - 64,800 acres, Class III - 46,580 acres, Class IV - 371,617 acres. | Visual resource management would be: Class I - 43,807 acres, Class II - 47,852 acres, Class III - 37,355 acres, Class IV - 354,063 acres. | Visual resource management would be: Class I - 27,901 acres, Class II - 27,384 acres, Class III - 293,417 acres, Class IV - 134,375 acres. |
| WILDERNESS | | Recommend all three WSAs (41,865 acres) as non-suitable for wilderness designation. | Recommend all three WSAs (41,865 acres) as non-suitable for wilderness designation. | Recommend all three WSAs (41,865 acres) as suitable for wilderness designation. | Recommend the Gunnison Gorge WSA (21,038 acres) as suitable for wilderness designation. Recommend both the Camel Back WSA (10,402 acres) and the Adobe Badlands WSA (10,425 acres) as non-suitable for wilderness designation. |
| | | Manage all three areas under a general multiple-use policy. The Gunnison Gorge area would be managed with emphasis on recreation and habitat for T&E animal species. | Manage all three areas with emphasis on livestock grazing and mineral exploration. The protective withdrawal would be lifted on the Gunnison Gorge. The area would be managed for possible hydroelectric development. | | Manage the Camel Back area with emphasis on riparian/aquatic system management, wildlife habitat, and livestock grazing. Close the entire area to ORV use. Manage 6,783 acres of the Adobe Badlands WSA as an ONA/ACEC to protect the scenic qualities and T&E plants, and to reduce active erosion. Manage the remainder of the Adobe Badlands WSA (3,642 acres) as wildlife habitat. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|--|---|--|---|--|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| MAJOR UTILITIES | | Public lands on 421,930 acres would be open to development of major utilities; 40,029 acres would be open but not preferred for utility development; 21,118 acres would be excluded from utility development. | Public lands on 449,597 acres would be open to development of major utilities; 33,480 acres would be excluded from utility development. | Public lands on 106,851 acres would be open to development of major utilities; 32,356 acres would be open but not preferred for utility development; 69,906 acres would be excluded from utility development. Special stipulations would restrict utility development on 273,964 acres. | Public lands on 301,006 acres would be open to development of major utilities; 82,038 acres would be excluded from utility development. Special stipulations would restrict utility development on 100,033 acres. |
| 69 LAND TENURE ADJUSTMENT | As opportunities are presented, primarily through exchange, pursue acquisition of non-federal lands which would meet established criteria and enhance resource management within management units. | Consider 19 tracts of public land totalling 830.25 acres as suitable for disposal. Pursue acquisition of 2,200 acres of private land in the Gunnison Gorge Recreation Area. | Consider 171 tracts of public land totalling 29,496 acres as suitable for disposal. Pursue acquisition of 3,640 acres of Colorado DOW land in the Escalante Creek area and available private land near Dry Creek and along the lower Gunnison River below the Roubideau Creek confluence in proposed waterfowl areas. | Consider no public lands as suitable for disposal. Pursue acquisition of 2,200 acres of private land in the Gunnison Gorge Recreation Area and 320 acres of private land in and adjacent to the Camel Back WSA. Pursue acquisition of private lands in proposed waterfowl areas, in riparian zones, and in crucial deer and elk winter ranges. | Consider 143 tracts of public land totalling 11,026 acres as suitable for disposal. Pursue acquisition, primarily through exchange, of private lands which meet established criteria and enhance resource management within management units. |
| ACCESS | | Acquire public road access into 14 areas and public trail access into one area. | Acquire public road access into 13 areas. | Acquire public road access into 7 areas. | Acquire public road access into 15 areas and public trail access into one area. |

Table 7 (continued)

| RESOURCE/ RESOURCE USE | GENERAL GUIDANCE | MANAGEMENT UNDER THE ALTERNATIVES AND THE PROPOSED PLAN | | | |
|------------------------------|------------------|--|---|---|---|
| | | Continuation of Current Management Alternative | Production Alternative | Conservation Alternative | Proposed Plan |
| FIRE MANAGEMENT | | All public lands in the planning area (483,077 acres) would have full and immediate fire suppression, with safety and cost-effectiveness considerations. | Public lands totalling 112,945 acres would have intensive fire suppression; 201,799 acres would have conditional fire suppression. Prescribed fire would be permitted on 168,333 acres. | Public lands totalling 112,945 acres would have intensive fire suppression; 201,799 acres would have conditional fire suppression. Prescribed fire would be permitted on 168,333 acres. | Public lands totalling 110,252 acres would have intensive fire suppression; 202,895 acres would have conditional fire suppression. Prescribed fire would be permitted on 169,930 acres. |

IMPACTS OF THE PROPOSED PLAN

This section describes the physical, biological, and economic consequences of implementing the Proposed Resource Management Plan.

Only those resources which would be impacted as a result of implementation of the proposed management actions are discussed. Topography, geology, and prime and unique farmlands would not be impacted by the BLM's proposed plan and are therefore not discussed.

Both adverse and beneficial impacts, based on the effects of proposed management actions, were analyzed. The impact analyses also reflect a comparison of these environmental consequences with the affected environment (Chapter Two of the Draft RMP/EIS).

Mitigating measures designed to avoid or reduce environmental impacts were incorporated into the proposed plan. Identified impacts are considered unavoidable given the prescribed mitigation.

An interdisciplinary approach was used in developing and analyzing environmental consequences. The general assumptions and guidelines which defined the process included:

1. Only significant changes or impacts, which vary by resource, would be analyzed.
2. Changes or impacts described are short-term unless otherwise stated. Short-term impacts would occur within the life of the proposed plan (10 to 12 years); long-term impacts would occur over a 20-year period.
3. Proposed management actions were analyzed under the assumption that the proposed plan would be fully implemented and that adequate funding and staffing would be available for implementation.

The analysis of the impacts of the proposed plan is subdivided by impacted resources or resource uses. Impacts are then described as (1) Impacts from Proposed Management Actions, and (2) Cumulative Impacts. (Where cumulative impacts are not presented separately, they would be the same as the impacts from proposed management actions.)

The impact analysis is presented as *impacts on a resource/resource use that would result from a proposed management action or actions*. For example, *impacts on air quality would result from proposed off-road vehicle management*.

IMPACTS ON AIR QUALITY

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Air Quality Management. Air pollution emissions from primary sources would be minimized through enforcement of applicable policies, regulations, and statutes.

Impacts from Wildlife Habitat and Livestock Grazing Management. Short-term localized impacts on air quality would result from vegetation manipulation practices. These minor impacts would be dispersed throughout the planning area.

Impacts from Off-Road Vehicle Management. Managing 80 percent of the planning area as open to ORV use for all or portions of the year would result in increased fugitive dust emissions due to vehicle-caused soil erosion. Allowing ORV use on 25,277 acres of highly erodible soils during critical soil moisture periods would significantly increase localized fugitive dust levels as recreational ORV use increases.

CUMULATIVE IMPACTS ON AIR QUALITY

Increased levels of air pollution are anticipated due to regional growth and development. No land-use allocations specified in this proposed plan would have significant long-term effects on air quality.

IMPACTS ON COAL

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Coal Management. Allowing continued development of coal on 26,663 acres of existing coal leases and identifying 83,334 acres of federal coal estate as acceptable for further coal leasing consideration could permit leasing and mining of up to 5,730 million tons of in-place coal. An additional 1,756 acres of federal coal reserves under private surface and bounded by the Gunnison National Forest would be managed to permit leasing consideration of 101 million tons of in-place coal.

The possible leasing of up to 5,730 million tons of coal would far exceed coal demand over the life of this plan as the 1985 coal production from Delta and Gunnison counties was 2.2 million tons and optimistic annual coal production forecasts for this area range from 4.5 to 7.35 million tons for the years 1990 to 2000. However, any increase in available coal would increase coal leasing opportunities for coal developers.

PROPOSED PLAN IMPACTS

Impacts from Oil and Gas Management. Leasing and subsequent development of oil and gas in the same areas identified as acceptable for further coal leasing consideration could reduce the amount of coal available for mining. This reduction would depend on the scope and timing of development of both resources and the amount of coal determined necessary to be left as pillars to protect oil and gas wells. No projections have been made on coal losses due to oil and gas well protection. However, there could be a conflict if the amount of coal required to be left in place would make the area uneconomical to mine.

Impacts from Riparian/Aquatic Systems Management. Requiring mitigating measures for surface disturbances within these areas would result in increased operating costs for coal companies.

Impacts from Wildlife Habitat Management. Not permitting new road and facility construction from December 1 through April 30 on 920 acres of deer and elk winter range could result in higher development costs and scheduling inconvenience for coal companies.

Impacts from Recreation Management. Closing 6,783 acres to coal leasing would have no impact since there are no coal resources within the Adobe Badlands ONA.

CUMULATIVE IMPACTS ON COAL

The proposed plan is not anticipated to impact coal production levels over the life of the plan. Restrictive management on portions of the coal planning areas would be likely to increase operating costs and result in scheduling inconvenience for coal companies. Under the proposed plan, 4,396 million tons of in-place federal coal (84,170 acres) would be acceptable for further coal leasing consideration and 48 million tons of in-place federal coal (920 acres) would be acceptable for further coal leasing consideration with stipulations. Development of 1,387 million tons of coal on 26,663 acres of existing coal leases would continue.

IMPACTS ON OIL AND GAS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Oil and Gas Management. Table 8 lists the acres of federal oil and gas estate in each leasing category, and Table 9 lists the acres under each leasing category by management unit. Managing 484,349 acres with standard lease terms would allow for exploration and development with few restrictions. Managing 176,076 acres of federal surface and 16,136 acres of split-estate lands with seasonal stipulations on surface occupancy could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. Managing 5,872 acres with a no surface occupancy stipulation would increase drilling costs as directional drilling would be required. Although these

acres are within the practical limits of directional drilling, any increased operating costs could lower the potential for production. For the purposes of this document, the practical limits of directional drilling are defined as being within 0.5 mile from the boundary of the management area.

Table 8
LAND IN EACH OIL AND GAS
LEASING CATEGORY:
PROPOSED PLAN

| LEASE CATEGORY | ACRES |
|----------------------------|---------|
| NO LEASING | |
| Federal Surface | 21,038 |
| STANDARD LEASE TERMS | |
| Federal Surface | 276,828 |
| Split-Estate | 207,521 |
| LEASING WITH STIPULATIONS | |
| No Surface Occupancy (NSO) | |
| - Federal surface | 9,135 |
| Seasonal | |
| - Federal surface | 176,076 |
| - Split-estate | 16,136 |

Oil and gas development would be essentially foregone on 3,263 acres that are under no surface occupancy stipulations and beyond the practical limits of directional drilling. These 3,263 acres are determined to have moderate favorability for oil and gas accumulation.

Impacts from Coal Management. Coal mining could result in delays in drilling schedules, higher drilling and development costs, and requirements for use of special techniques and alternate drilling sites. Coal mining could damage existing wells and remove or reduce gas resources if potential gas producing zones were located within mineable coal beds.

Impacts from Soils and Water Resources Management. Managing 24,177 acres of federal surface and 4,155 acres of split-estate lands in the salinity control areas with seasonal stipulations (March 1 through May 31) could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. This potential adverse impact would be most significant in the KGS areas where the probability of continued exploration and development is the greatest.

Table 9

**MANAGEMENT OF OIL AND GAS LEASES BY MANAGEMENT UNIT:
PROPOSED PLAN**

| MANAGEMENT UNIT | ACRES WITH STANDARD LEASE TERMS | | ACRES WITH SEASONAL STIPULATIONS | | | | | | | | ACRES WITH NO SURFACE OCCUPANCY STIPULATIONS | ACRES CLOSED TO LEASING | |
|-----------------|---------------------------------|---------|----------------------------------|--------------|------------------------------|--------------|-----------------|--------------|-----------------|--------------|--|-------------------------|-----------------|
| | | | 12/1 to 4/30 | | 3/15 to 6/30 12/1 to 4/30 | | 5/1 to 6/15 | | 3/1 to 5/31 | | | | |
| | | | Federal Surface | Split-Estate | Federal Surface | Split-Estate | Federal Surface | Split-Estate | Federal Surface | Split-Estate | | | Federal Surface |
| 1 | 118,238 | 20,897 | 68,572 | 623 | — | — | — | — | — | — | — | — | — |
| 2 | 30,313 | 13,645 | 37,007 | 8,850 | — | — | — | — | — | — | — | — | — |
| 3 | 19,055 | 67 | 28,552 | 25 | — | — | — | — | — | — | — | — | — |
| 4 | 32,715 | 970 | 8,077 | 280 | — | — | — | — | — | — | — | — | — |
| 5 | — | — | — | — | — | — | — | — | — | 24,177 | 4,155 | — | — |
| 6 | — | — | — | — | — | — | — | — | — | — | — | — | 21,038 |
| 7 | 13,865 | 28,515 | 3,367 | 630 | — | — | — | — | — | — | — | — | — |
| 8 | 8,942 | — | — | — | — | — | — | — | — | — | — | — | — |
| 9 | 6,320 | — | — | — | — | — | — | — | — | — | — | — | — |
| 10 | — | — | — | — | — | — | — | 3,292 | 1,423 | — | — | — | — |
| 11 | — | — | — | — | 1,990 | 150 | — | — | — | — | — | — | — |
| 12 | — | — | — | — | — | — | — | — | — | — | — | 1,895 | — |
| 13 | — | — | — | — | — | — | — | — | — | — | — | 377 | — |
| 14 | — | — | — | — | — | — | — | — | — | — | — | 80 | — |
| 15 | — | — | — | — | — | — | — | — | — | — | — | 6,783 | — |
| 16 | 47,380 | 143,427 | 1,042 | — | — | — | — | — | — | — | — | — | — |
| TOTALS | 276,828 | 207,521 | 146,617 | 10,408 | 1,990 | 150 | 3,292 | 1,423 | 24,177 | 4,155 | 9,135 | 21,038 | |

PROPOSED PLAN IMPACTS

Impacts from Threatened and Endangered Species Management. Managing 2,272 acres of threatened and endangered species habitat and unique plant association areas with a no surface occupancy stipulation would result in higher drilling and development costs as directional drilling would be required.

Impacts from Wildlife Habitat Management. Managing 151,899 acres of federal surface and 11,981 acres of split-estate lands in crucial deer and elk winter range, bald eagle winter habitat, elk calving areas, and waterfowl habitat areas with seasonal stipulations could result in higher exploration, drilling, and development costs, along with scheduling inconvenience. This potential adverse impact would be most significant in the KGS areas where the probability of continued exploration and development is the greatest.

Impacts from Recreation Management. Managing the Needle Rock ONA/ACEC and the Adobe Badlands ONA/ACEC with a no surface occupancy stipulation would eliminate oil and gas production potential on 3,263 acres which are not suitable for directional drilling. This would also result in higher drilling and development costs on 3,600 acres where directional drilling would be required.

Impacts from Wilderness Management. The negative impact of closing the Gunnison Gorge WSA to leasing would be negligible as geologic structures in this area have no favorability for oil and gas accumulation.

CUMULATIVE IMPACTS ON OIL AND GAS

No surface occupancy stipulations within the Adobe Badlands ONA/ACEC would result in unquantifiable negative impacts on oil and gas development. These impacts would be expected to be moderate. The favorability for oil and gas is considered moderate based on the area's proximity to three KGS areas. Seasonal stipulations on 176,076 acres of federal surface and on 16,136 acres of split-estate lands and no surface occupancy stipulations on 9,135 acres of federal surface could increase exploration and development costs to the point of decreasing production potential throughout the planning area. Production potential would be eliminated on 3,263 acres managed under no surface occupancy stipulations that are beyond the practical limits of directional drilling. Overall, these negative impacts would be rated low to moderate since the entire planning area has a low to moderate favorability for oil and gas production.

IMPACTS ON LOCATABLE MINERALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Locatable Minerals Management. Identifying 642,392 acres as open to mineral entry and location would make this area available for exploration and

development under the general mining laws. Withdrawing 32,750 acres from mineral entry and location would eliminate these lands from possible mineral development. Table 10 lists the acres proposed for protective withdrawal.

Table 10
FEDERAL SURFACE/MINERALS
WITHDRAWN FROM ENTRY TO
PROTECT EACH LISTED RESOURCE:
PROPOSED PLAN

| RESOURCE REQUIRING PROTECTIVE WITHDRAWAL | ACRES WITHDRAWN |
|--|-----------------|
| THREATENED AND ENDANGERED SPECIES | |
| Escalante Canyon ACEC | 1,895 |
| Fairview RNA/ACEC | 377 |
| RECREATION | |
| Needle Rock ONA/ACEC | 80 |
| WILDERNESS | |
| Gunnison Gorge WSA | 21,038 |
| OTHER | |
| Bureau of Reclamation withdrawals | 9,360 |
| TOTAL | 32,750 |

The negative impact of withdrawing the Gunnison Gorge WSA from mineral entry and location would be low to moderate as geologic structures in the area have a moderate favorability for accumulation of locatable minerals. There are no known mineral deposits in the WSA. Approximately 20 lode claims and several prospects which are located within or adjacent to the WSA indicate some minerals interest in the local area.

Mining claimants with invalid claims located within the WSA would be adversely affected as development or extraction would be permitted only on claims proven to have valid mineral discoveries. In addition, the potential for mineral discoveries on lands unclaimed prior to wilderness designation would be eliminated.

Retaining the withdrawal on the 80-acre Needle Rock ONA/ACEC would have a low negative impact as there are no known mineral values within this area. Retaining the Bureau of Reclamation withdrawals on 9,360 acres would have an unknown impact as little data is available on mineral potentials within these areas. There are no known mineral values on these withdrawn lands and little interest has been expressed for mineral explorations.

PROPOSED PLAN IMPACTS

The negative impacts of withdrawing the Escalante Canyon ACEC (1,895 acres) and Fairview RNA/ACEC (377 acres) from mineral entry and location would be low as geologic structures in these areas have a low favorability for accumulation of locatable minerals. There are no known locatable mineral deposits or evidence of past mineral development within these areas. The potential for economic discoveries is poor. There has been recent interest in possible placer deposits adjacent to the Fairview RNA/ACEC, but the future of this interest is speculative. Uranium and vanadium mineralization is considered likely within the Escalante Canyon ACEC but there are no known concentrations.

Managing the Adobe Badlands ONA/ACEC (6,783 acres) and 10,402 acres of recreation areas as closed to ORV use would result in increased operating costs and inconvenience for mining claimants as plans of operations would be required for all activities except casual use.

Disposal of public lands could result in management problems associated with split-estate lands.

IMPACTS ON MINERAL MATERIALS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Mineral Materials Management. Identifying 381,358 acres as open to disposal of mineral materials with no seasonal restrictions would make this resource available to the public and government entities on 79 percent of the planning area with a minimum of restrictions. Managing 63,174 acres with seasonal restrictions on disposal activities could result in scheduling inconvenience for operators. The impact of closing 36,493 acres to disposal of mineral materials would be low as there are numerous alternate sites available elsewhere in the planning area. In some circumstances, the costs of hauling mineral materials could be increased as closures could increase travel distances to open mineral material locations. Requiring approval of the withdrawing agency for disposal of mineral materials on 9,360 acres could result in the denial of permit applications for mineral materials on these lands.

Table 11 lists the federal surface in each mineral material disposal category by protected resource.

Table 11
FEDERAL SURFACE IN EACH MINERAL MATERIAL DISPOSAL CATEGORY
BY PROTECTED RESOURCE:
PROPOSED PLAN

| RESOURCE REQUIRING PROTECTIVE CATEGORY | ACRES OPEN | ACRES WITH SEASONAL RESTRICTIONS | | | ACRES CLOSED |
|--|----------------|-------------------------------------|-------------------|--------------------|-----------------|
| | | 12/1 to 4/30 | 3/1 to 5/31 | 3/15 to 6/30 | |
| Federal surface with no restrictions required | 381,358 | — | — | — | — |
| SALINITY AREAS | — | — | 24,177 | — | — |
| RIPARIAN/AQUATIC AREAS | — | — | — | — | 6,320 |
| T&E SPECIES | | | | | |
| Escalante Canyon ACEC | — | — | — | — | 1,895 |
| Fairview RNA/ACEC | — | — | — | — | 377 |
| WILDLIFE HABITAT | | | | | |
| Deer/elk winter range | — | 37,007 | — | — | — |
| Waterfowl area | — | — | — | 1,990 | — |
| RECREATION | | | | | |
| Needle Rock ONA/ACEC | — | — | — | — | 80 |
| Adobe Badlands ONA/ACEC | — | — | — | — | 6,783 |
| WILDERNESS | | | | | |
| Gunnison Gorge WSA | — | — | — | — | 21,038 |
| TOTALS | 381,358 | 37,007 | 24,177 | 1,990 | 36,493 |

PROPOSED PLAN IMPACTS

IMPACTS ON SOILS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Soils Management. Minimizing soil disturbance on all surface-disturbing activities would decrease potential losses of soil productivity. Permitting soil and watershed projects within 312,489 acres, of which 17,806 acres have soils that are determined to be highly erodible, would allow for mitigation of soil erosion as problem areas develop.

Impacts from Mineral Resources Management. Surface-disturbing activities would decrease soil productivity through soil compaction, erosion, mixing of soil horizons, and reduced soil moisture retention capabilities. Coal development would result in soil productivity losses on less than 1,000 acres due to road and facility placement and increased soil slumping and mud flows.

Development of oil and gas leases on 676,561 acres, locatable minerals on 642,392 acres, and mineral materials on 444,532 acres would decrease soil productivity unless rehabilitation efforts are successful. Development of locatable minerals within 69,389 acres of easily eroded soils during critical soil moisture periods (March 1 through May 31) would decrease soil productivity over the long-term. Similar impacts would result from development of oil and gas leases and mineral material areas within 41,288 acres of these soils. Accidental fluid discharges during drilling operations could also contaminate soils.

Impacts from Water Resources Management. Seasonal restrictions on surface-disturbing activities and potential livestock forage utilization limits on 30,960 acres of highly saline soils (Management Unit 5 and Management Unit 15) would decrease erosion and increase soil productivity within these areas. Developing in-channel structures and land treatments on 24,177 of these acres would further protect soils from erosion.

Impacts from Wildlife Habitat and Livestock Grazing Management. Intensively managing 336,562 acres of "T" category grazing allotments would reduce soil compaction and erosion rates over the long-term in these areas as AMP objectives to increase ground cover are achieved. Permitting grazing during soil moisture periods (March 1 through May 31) and forage utilization greater than 35 percent on 38,953 acres of easily eroded soils would result in soil productivity losses within these areas. Eliminating grazing from March 20 to range readiness and increasing basal ground cover on 24,177 acres (Management Unit 5), along with restricting forage utilization to 35 percent on 2,370 acres (Elephant Skin Wash area) would increase soil productivity and decrease long-term annual erosion rates by up to three tons per acre in these areas.

Short-term erosion would increase by one to ten times present levels on vegetation treatments designed to increase wildlife and livestock forage. Soil productivity would surpass present levels over the long-term as treatments increase basal ground cover.

Impacts from Forest Management. Road construction and surface disturbance from harvest activities would result in increased erosion. Erosion would decrease over time if harvests result in an increase in basal ground cover. Harvesting activities during critical soil moisture periods on 13,582 acres of easily eroded soils would result in moderate increases in erosion and decreases in soil productivity.

Impacts from Recreation Management. Managing 24,552 acres for ORV recreation opportunities would result in long-term erosion within these areas. Soils within a 19,957-acre portion of these ORV recreation areas are determined to be highly erodible. ORV-derived erosion would increase as more ORV enthusiasts become aware of and utilize these areas.

Impacts from Off-Road Vehicle Management. Not permitting ORV use on 20 percent of the planning area would protect these areas from ORV-derived erosion and other soil disturbance. Managing 46 percent of the planning area as open to ORV use would allow for decreased soil productivity as soils are disturbed and vegetation is trampled. Soil productivity losses would be greatest from ORV use on 25,336 acres of highly erodible soils. Seasonal ORV restrictions would partially protect soils on 163,227 acres from ORV-derived erosion during some of the soil moisture periods when soils are most vulnerable to damage.

Impacts from Major Utility Development. Managing 301,066 acres as open to development of major utility facilities would allow for increased soil disturbance due to construction and maintenance activities. Soil productivity losses would be greatest from these activities during critical soil moisture periods (March 1 through May 31) on 25,277 acres of highly erodible soils. Seasonal restrictions on these activities would partially protect 24,177 acres of highly erodible soils during portions of the critical soil moisture periods when soils are most vulnerable to damage.

Impacts from Fire Management. Management for both planned and natural prescribed burning on 169,930 acres would allow for vegetation type conversion from pinyon-juniper woodlands to a more soil-protective grass and forb plant community. Fire suppression activities (fire lines, ORV use) could decrease soil productivity by removing protective vegetation and increasing erosion and compaction. The overall net deterioration of soils would depend on site-specific variables.

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CUMULATIVE IMPACTS ON SOILS

Under the proposed plan, soil conditions would be anticipated to improve slightly throughout the entire planning area. Intensive management of salinity areas and grazing allotments would benefit soil conditions within these areas. Intensive management would be especially beneficial on 39,000 acres of highly erodible soils. Permitting soil and watershed projects within 312,489 acres would allow for mitigation of soil erosion as problem areas develop.

Mineral activities, forest and woodland product harvests, livestock grazing on 38,953 acres, and ORV use would result in decreased soil productivity in portions of the planning area. This productivity loss would be most pronounced on 25,000 acres of highly erodible and saline soils where few watershed-protective measures would be implemented.

IMPACTS ON WATER RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Water Resources Management. Seasonal restrictions on surface-disturbing activities and potential livestock forage utilization limits on 30,960 acres of highly saline soils (Management Unit 5 and Management Unit 15) would reduce salinity and sediment levels in local surface waters and assist in reducing salinity levels within the Upper Colorado River Basin. Developing in-channel structures and land treatments on 24,177 of these acres would further protect surface waters from salinization and sedimentation.

Permitting watershed projects within an additional 312,489 acres would allow for mitigation of water quality deterioration as problem areas develop. Of these areas, 17,806 acres are within highly erodible and saline soil areas.

Impacts from Coal Management. Coal leasing and development would result in increased sediment yields from roads, mine facilities, or other surface-disturbing activities. Mine discharges and spoil-pile runoff could increase salt levels in local surface water systems. Overburden fracturing and subsidence from underground mining could result in loss of ground water quantity and quality. Loss of either surface or ground water could adversely affect adjudicated water rights. These impacts would be less pronounced within riparian corridors where mining would be restricted to protect riparian habitat.

Impacts from Oil, Gas, and Geothermal Resources Management. Identifying 685,696 acres as acceptable for oil and gas leasing could result in both surface and ground water impacts. Construction of roads and drilling pads would increase sediment and salinity yields in local surface waters. These impacts would be most pronounced on 34,505 acres of easily eroded and/or high salinity soils as oil and gas

operations would be permitted during the critical wet soil period (March 1 through May 31) when these soils are most vulnerable to damage. Accidental fluid discharges during drilling operations could contaminate surface water.

Impacts from Locatable Minerals Management. Identifying 93 percent of the planning area as open to mineral entry and location could result in water quality degradation. Road construction and other mine-related disturbance would increase sediment and salinity loads in local surface waters. These impacts would be greatest from placer mining operations. All operations could result in heavy metal contamination from mine water discharges and spoil-pile runoff.

Impacts from Mineral Materials Management. Managing 92 percent of the planning area as open to disposal of mineral materials would impact water resources. Road construction and extraction of mineral materials would increase sediment and salt loads in local surface waters. These increased sediment and salt loads would be most pronounced from mineral material activities on 34,505 acres of easily eroded soils during critical wet soil periods (March 1 through May 31).

Mineral material operations in close proximity to perennial water courses would have the potential of destabilizing and altering natural stream channels and disrupting the beneficial values of floodplains. These impacts could result in alteration of water tables and surface water flows and could increase the destructiveness of floods.

Impacts from Riparian/Aquatic Systems Management. Managing riparian zones and aquatic habitat on 6,320 acres to improve vegetation condition, streambank cover, and aquatic diversity would result in reduced sediment yields and streambank erosion and improved chemical water quality. Closing seven miles of roads in the Potter Creek and Dry Fork of Escalante Creek drainages would reduce sediment loads in these areas.

Impacts from Wildlife Habitat Management. Soil disturbances from chainings and other vegetation treatments scattered over 300,527 acres would cause short-term sediment yield increases. Successful land treatments would reduce sediment yields and improve overall erosion conditions over the long-term.

Impacts from Livestock Grazing Management. Intensively managing 336,562 acres as "I" category grazing allotments would result in lower sediment yields as AMP objectives to increase ground cover are achieved. Short-term sediment yield increases would be expected from vegetation treatments. Sediment yields are not expected to change on 113,850 acres that are not within intensively managed allotments.

Permitting grazing during wet soil periods (March 1 through May 31) and forage utilization greater than 35

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percent on 38,954 acres of easily eroded and highly saline soils could result in increased sediment and salinity yields. Eliminating grazing from March 20 to range readiness and increasing basal ground cover on 24,177 acres, and restricting forage utilization to 35 percent on 2,370 acres (Elephant Skin Wash area) of easily eroded and highly saline soils would reduce sediment and salt yields from these areas. Eliminating grazing from March 1 to May 15, potentially restricting forage utilization to 35 percent, and restricting livestock trailing on 6,320 acres of riparian/aquatic areas would result in reduced sediment yields and streambank erosion and improved water quality on 70 stream miles.

Impacts from Forest Management. Road construction and surface disturbance from harvest activities would result in increased sediment yields. Sediment yields would decrease over time if harvests result in an increase in basal ground cover. Harvesting activities during wet soil periods on 13,582 acres of easily eroded soils would result in moderate increases in surface water sedimentation.

Impacts from Recreation Management. Managing 24,552 acres for recreational ORV use would increase sediment and salt yields from these easily eroded and highly saline soil areas.

Impacts from Off-Road Vehicle Management. Not permitting ORV use on 20 percent of the planning area would protect these areas from ORV-derived sedimentation. Managing 46 percent of the planning area as open to ORV use would allow for increased sediment loads as soils are disturbed and vegetation is trampled. Water quality deterioration would be greatest from ORV use on 25,336 acres of highly erodible and saline soils. Seasonal ORV restrictions on 163,227 acres would partially protect these areas from ORV-derived sedimentation during wet soil periods when soils are most vulnerable to damage.

Impacts from Major Utility Development. Managing 301,066 acres as open to development of major utility facilities would allow for increased sediment loads due to construction and maintenance activities. Water quality deterioration would be greatest from these activities at stream crossings and during wet soil periods (March 1 through May 31) on 25,277 acres of highly erodible and saline soils. Seasonal restrictions on construction and major maintenance activities would partially protect 24,177 acres of highly erodible and saline soils from disturbance during wet soil periods when these soils are most vulnerable to damage.

Impacts from Fire Management. Management for both planned and natural prescribed burning on 169,930 acres would allow for vegetation type conversion from pinyon-juniper woodlands to a more watershed-protective grass and forb plant community. Fire suppression activities (fire lines, ORV use) could decrease watershed productivity by removing protective vegetation and increasing erosion and

sedimentation. The overall net deterioration of watershed conditions would depend on site-specific variables.

CUMULATIVE IMPACTS ON WATER RESOURCES

Under the proposed plan, a slight improvement in water resources would be anticipated throughout the entire planning area. Intensive management of salinity areas, riparian zones, aquatic habitats, and grazing allotments would benefit the hydrologic condition of water courses and improve the chemical and physical properties of surface waters. Intensive management would be especially beneficial on 39,000 acres of highly erodible and saline soils.

Mineral activities, forest and woodland product harvests, livestock grazing on 38,954 acres, and ORV use would result in increased sediment and salt yields in portions of the planning area. These increased yields would be most pronounced on 25,000 acres of highly erodible and saline soils where few watershed-protective measures would be implemented.

IMPACTS ON RIPARIAN ZONES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Riparian Zone Management. Intensively managing 6,320 acres of riparian zones would improve vegetation cover, composition, density, and diversity. Overall improvement to fair or good vegetation condition could be expected over the short-term.

Impacts from Mineral Resources Management. Approximately 4,000 acres of riparian zones would be opened to mineral exploration if withdrawals are lifted. Road construction, facility development, dredging operations, and other surface-disturbing activities in riparian zones would remove riparian vegetation, compact the soil, and could redirect subsurface water.

Impacts from Soils and Water Resources Management. Water impoundment projects would improve conditions necessary for establishment of riparian vegetation. This could potentially increase riparian zones by 100 to 200 acres over the long-term.

Impacts from Wildlife Habitat Management. Development of in-channel structures designed to improve aquatic habitat would stabilize riparian vegetation and enhance its quality.

Impacts from Livestock Grazing Management. Potentially restricting livestock utilization to 35 percent on 6,320 acres of riparian zones and intensively managing grazing use on 5,125 acres of riparian zones would improve vegetation density, diversity, and stability over the next ten years.

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Impacts from Forest Management. Road and facility construction and other surface-disturbing activities in riparian zones would remove riparian vegetation. An estimated 60 to 100 acres of riparian vegetation would be degraded over the next ten years.

Impacts from Recreation Management. Riparian vegetation on 35 acres in the Gunnison Forks area would be severely impacted by trampling and vehicle use.

Impacts from Off-Road Vehicle Management. Restricting vehicle use to designated roads and trails on 5,640 acres and closing an additional 680 acres of riparian zones in Potter and Roubideau creeks to ORV use would improve vegetation condition and eliminate rutting and soil compaction.

Impacts from Major Utility Developemnt. Eliminating riparian zones from major surface-disturbing activities having long-term adverse effects would protect these areas and maintain their present condition.

CUMULATIVE IMPACTS ON RIPARIAN ZONES

Direct and indirect intensive management under the proposed plan would result in improved vegetation conditions on 7,310 acres of riparian zones.

IMPACTS ON THREATENED AND ENDANGERED SPECIES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Threatened and Endangered Species Management. Designating 1,895 acres in Escalante Canyon as an Area of Critical Environmental Concern (ACEC) would protect the Uinta Basin hookless cactus (threatened), the Grand Junction milkvetch (candidate), the Delta lomatium (sensitive), and three unique plant associations from most surface-disturbing activities. Opportunities for research and special studies of the plant associations would be expanded. Designating 377 acres east of Montrose as a Research Natural Area, an area of critical environmental concern (RNA/ACEC) would protect populations and habitats of clay-loving wild buckwheat and Montrose penstemon from most surface-disturbing activities. Designating 6,783 acres north of Delta as an Outstanding Natural Area, an area of critical environmental concern (ONA/ACEC) would protect occupied and potential habitat of the Uinta Basin hookless cactus and clay-loving wild buckwheat from disturbance over the long-term.

Pre-disturbance inventories area-wide would add substantially to the data base for all threatened and endangered species. Some inadvertent destruction of individual plants would occasionally occur.

Impacts from Mineral Resources Management. Closing 2,272 acres of threatened and endangered species habitat to mineral entry and location and placing a no surface occupancy stipulation on 9,135 acres would prevent accidental destruction of threatened and endangered plant species and potential habitat. Possible disturbance could affect 21,633 acres of potential endangered, threatened, candidate, and sensitive plant species habitat.

Removing the no surface occupancy stipulation on 140 acres of bald eagle wintering habitat would displace some bald eagles. Lifting mineral withdrawals on the lower Gunnison River and allowing surface-disturbing activities would reduce the value of 6,680 acres as wintering bald eagle habitat.

Impacts from Soils and Water Resources Management. In-channel structures and land treatment projects would be slightly beneficial to bald eagles and peregrine falcons. Water impoundments and resulting increases in vegetation cover would improve these raptors' prey base habitat.

Impacts from Riparian/Aquatic Systems Management. Improvement of the riparian zones along Roubideau and Escalante creeks and in the North Fork Valley would improve peregrine falcons' and wintering bald eagles' prey base habitat.

Impacts from Wildlife Habitat Management. Continued management of the Gunnison Forks HMP area would maintain existing bald eagle and river otter habitat. Peregrine falcons would be expected to increase their use of the area over the long-term. Waterfowl habitat improvement and associated land acquisition could provide migrating whooping cranes, long-billed curlews, and white-faced ibis with additional protected habitat and stop-over points.

Impacts from Livestock Grazing Management. Some localized disturbance and destruction of individual threatened and endangered plants would occur due to livestock trampling.

Impacts from Recreation Management. Decreasing river use in the Gunnison Gorge would improve river otter habitat through decreased destruction of riparian vegetation. Bald eagles and peregrine falcons would benefit from reduced human disturbance in the gorge.

Impacts from Off-Road Vehicle Management. Closing approximately 38,600 acres to ORV use and restricting vehicle use to designated roads and trails would eliminate potential destruction and damage of the Uinta Basin hookless cactus, spineless hedgehog cactus, Montrose penstemon, Grand Junction milkvetch, and clay-loving wild buckwheat.

Impacts from Wilderness Management. Management of 21,038 acres under wilderness guidelines would protect potential habitat of threatened and endangered plant and animal species from any mechanical disturbance. Habitat values would be maintained or improved.

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Impacts from Major Utility Development. Closing 6,783 acres of potential habitat of the Uinta Basin hookless cactus, clay-loving wild buckwheat, and Montrose penstemon to development of major utility facilities would protect these species from accidental destruction.

CUMULATIVE IMPACTS ON THREATENED AND ENDANGERED SPECIES

The research potential and study opportunities of several threatened and endangered species and unique plant associations would be protected with special designations. Designation of the Gunnison Gorge WSA as wilderness would protect bald eagle, peregrine falcon, and river otter habitats.

IMPACTS ON TERRESTRIAL WILDLIFE HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wildlife Habitat Management. Forage allocations for big game species on public land would meet both short-term and long-term demands.

Crucial deer and elk winter range management and land treatment projects would improve distribution, reduce stress, and decrease big game utilization of adjacent private lands. Minimizing disturbance in elk calving areas would reduce fetal mortality and increase calf survival.

Bighorn sheep habitat and herd management in the Gunnison Gorge area would potentially increase the population to 300 individuals by 1997. A small herd of bighorn sheep could be established in the Roundbideau Canyon/Camel Back area. Rocky Mountain bighorn sheep habitat in the Baldy Peak area would be improved.

Waterfowl production on the lower Gunnison River would increase by up to 50 percent.

Impacts from Mineral Resources Management. Road and portal construction and other surface-disturbing activities associated with mineral development would reduce crucial deer and elk winter range in the North Fork area by 500 acres. Seasonal restrictions on oil and gas activity on crucial deer and elk winter range (140,181 acres of federal surface and 9,715 acres of split-estate lands) would lessen stress on deer and elk, thereby reducing mortality and fetal loss and improving overall condition and health of the herds.

Revocation of existing withdrawals that presently segregate federal minerals from entry and location under the general mining laws could increase surface disturbance on 61,270 acres of habitat. Raptor hunting habitat and some nesting areas would be lost. Habitat for other birds, including

Lewis' woodpeckers, western bluebirds, and Scott's orioles, would possibly be reduced due to coal development.

Impacts from Soils and Water Resources Management. In-channel structures and water impoundments would provide habitat for waterfowl, chukars, mourning doves, mule deer, and non-game species.

Impacts from Riparian/Aquatic Systems Management. Restoring and protecting 6,320 acres of riparian zones would provide additional forage and cover for big game, waterfowl, and non-game birds and animals. The prey base for raptors and other predators would be improved.

Impacts from Livestock Grazing Management. Development of grazing systems, land treatment projects, and improved livestock management practices would improve forage conditions, reduce competition between livestock and big game, and improve distribution of most big game species. Eliminating livestock grazing use on approximately 24,177 acres during the spring would improve big game forage at a time when food reserves are low and females are pregnant. Improved nutrition may result in heavier birthweights and more successful reproduction. Land treatment projects designed to reduce sagebrush cover to less than 20 percent would eliminate present and potential sage grouse habitat in the Simms Mesa and Fruitland Mesa areas.

Impacts from Forest Management. Woodland harvests would provide temporary openings in forest stands, increasing edge effect and big game forage. The removal of old-growth timber would reduce thermal and hiding cover for big game and eliminate some nesting habitat for cavity-nesting birds. Woodland harvests could occur during the winter on 28,500 acres of crucial deer and elk winter range. On an annual basis, deer and elk would be displaced from 80 to 100 acres of active cutting area and adjacent habitat.

Impacts from Recreation Management. Restricting river use in the Gunnison Gorge would encourage continued expansion of the bighorn sheep population and prevent some degradation of riparian habitat for non-game species. Encouraging recreational and competitive ORV use in the North Delta area would curtail antelope utilization of the area, reducing antelope range by 8 percent. ORV use in the area would increase harassment of game and non-game wildlife and would displace prairie dog populations.

Impacts from Off-Road Vehicle Management. Closing 38,600 acres to vehicle use would eliminate disturbances or harassment of wildlife. This would be especially beneficial if desert bighorn sheep are reintroduced into the Camel Back area. Restricting vehicle use to designated roads and trails in crucial deer and elk winter range would reduce habitat loss. Seasonal ORV use restrictions in crucial deer and elk winter range would reduce stress on big game species,

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thereby reducing fetal mortality and losses from poaching, and permitting wildlife utilization of the entire area.

Impacts from Major Utility Development. Confining development of major utility facilities in the North Fork area to existing corridors along major roads would limit disturbance and stress on all wildlife species. Prohibiting development of utility facilities on 82,038 acres would prevent short-term disturbances and long-term wildlife habitat modifications due to road construction and use. Bighorn sheep would benefit greatly from exclusion and restriction of utilities in the Gunnison Gorge and Camel Back areas.

Impacts from Disposal of Public Lands. Disposal of 3,337 acres of crucial deer and elk winter range and an additional 1,028 acres of non-crucial winter range would result in the loss of habitat for 35 elk and 20 deer and would increase big game pressure on adjacent private lands. Disposal of 120 acres of antelope range would result in an approximate one percent reduction in herd size. Disposal of tracts providing prairie dog habitat could affect potential occurrences of burrowing owls. Habitat for band-tailed pigeons, Cooper's hawks, goshawks, flammulated owls, and other non-game species would be affected.

Impacts from Acquisition of Non-Federal Lands. Acquiring non-federal lands in crucial deer and elk winter range would increase habitat and potential big game populations, and reduce wildlife conflicts and impacts on adjacent private lands. Acquiring non-federal lands for waterfowl habitat management would increase waterfowl populations on public lands.

Impacts from Acquisition of Access. Acquiring public access would improve big game harvests and population control practices.

Impacts from Fire Management. Natural and planned prescribed fires would reduce closed brush and tree canopies, stimulate plant growth and vigor, and temporarily improve forage palatability, resulting in improved habitat for many wildlife species. Large wildfires would reduce effective screening and thermal cover for deer and elk use.

CUMULATIVE IMPACTS ON TERRESTRIAL WILDLIFE HABITAT

Increased coal development and disposal of public lands in crucial deer and elk winter ranges in combination with the loss of habitat on private lands would be offset by improvement of habitat conditions throughout the planning area. Present big game populations would be maintained; small game and non-game populations and habitats would be improved.

IMPACTS ON AQUATIC WILDLIFE HABITAT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wildlife Habitat Management. Structures placed in Escalante, Cottonwood, Monitor, Potter, and Jay creeks would improve pool:riffle ratios, stabilize streambanks, increase instream cover, and reduce channelization, streambank erosion, and sedimentation. Approximately 30 stream miles of aquatic habitat would be improved. Managing approximately 52 stream miles associated with Terror, Escalante, Monitor, Criswell, Potter, and Dry creeks would stabilize streambanks, increase instream cover, and reduce sedimentation. Limiting surface-disturbing activities on aquatic habitat would increase streambank cover, improve bank stability and water quality, and reduce soil compaction, sedimentation, and siltation. Land treatment projects in or near stream channels would increase sedimentation over the short-term and decrease it over the long-term.

Impacts from Mineral Resources Management. Road and pipeline development and other surface-disturbing activities would lead to increased sedimentation and streambank instability on 25 stream miles of aquatic habitat. Site-specific approval of surface-disturbing activities in aquatic areas could result in slight to moderate increases in sedimentation, water temperatures, and streambank erosion.

Impacts from Soils and Water Resources Management. In-channel structures designed to reduce sedimentation and salinity would improve aquatic habitat on streams below these structures.

Impacts from Riparian/Aquatic Systems Management. Improved riparian management on 6,320 acres of public land would result in improvement of 40 stream miles of aquatic habitat. Streambank stability, sedimentation, and water temperatures would benefit from improved streambank cover.

Impacts from Livestock Grazing Management. Intensive grazing management on 60 stream miles of aquatic habitat combined with a potential 35 percent utilization of key forage species limitation would improve streambank stability and cover. Sedimentation would decrease and water temperatures would stabilize. The existing condition would be maintained on the balance of the aquatic habitat. Land treatment projects in or near stream channels would increase sedimentation over the short-term and decrease it over the long-term.

Impacts from Forest Management. Road construction across aquatic areas could cause increased sedimentation, bank degradation, and water temperatures, and decreased streambank cover.

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Impacts from Recreation Management. Restricting river use in the Gunnison Gorge to six group encounters per day would improve streambank vegetation and water quality and reduce sedimentation. Aquatic habitat in the Gunnison Forks area would continue to be degraded due to trampling and intensive recreational use.

Impacts from Off-Road Vehicle Management. Closing areas to ORV use, imposing seasonal restrictions on ORV use, and restricting vehicle use to designated roads and trails in riparian zones should improve streambank stability and reduce sedimentation. The areas remaining open to ORV use would be subject to degradation.

Impacts from Major Utility Development. Short-term impacts caused by road construction, clearings for powerline pads, and pipelines would result in slight to moderate adverse impacts on aquatic and riparian habitat. Loss of vegetation, streambank deterioration, sedimentation, and erosion would cause localized impacts on aquatic/riparian organisms and habitat. Prohibiting or seasonally restricting surface-disturbing activities that would have long-term adverse effects on riparian/aquatic systems would, at the minimum, maintain current habitat quality.

CUMULATIVE IMPACTS ON AQUATIC WILDLIFE HABITAT

Approximately 140 stream miles of aquatic wildlife habitat would improve under management emphasizing habitat quality and protection. Eliminating or reducing surface-disturbing activities and potentially limiting livestock grazing utilization to 35 percent in riparian zones would have the greatest overall beneficial effect.

IMPACTS ON LIVESTOCK GRAZING

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Livestock Grazing Management. Not allocating additional forage for livestock use on 74,133 acres would reduce present grazing preferences by the 3,380 animal unit months (AUMs) currently in suspension. Land treatment projects and grazing management would increase forage allocations for livestock by 1,424 AUMs.

Impacts from Soils and Water Resources Management. Limiting livestock utilization to 35 percent of key forage species on 30,960 acres would reduce livestock allocations by 594 AUMs on ten grazing allotments. Eliminating livestock grazing on 24,177 acres from March 20 to range readiness could shift some livestock use to the fall, resulting in increased conflicts between livestock grazing and hunting use, higher mortality from disease due to longer spring confinement, increased trailing use, and decreased hay production due to livestock use of base property hay lands for a longer period in the spring. Additional forage would

become available over the long-term due to reduced spring use. In-channel structures and land treatment projects designed to reduce erosion and salinity would improve livestock distribution and increase available forage.

Impacts from Riparian/Aquatic Systems Management. If forage utilization by livestock is limited to 35 percent of key forage species on 6,320 acres of riparian vegetation, livestock allocations could be reduced by approximately 200 AUMs on seven grazing allotments. Eliminating livestock grazing on 6,320 acres from March 1 through range readiness could shift some livestock use to the fall, resulting in increased conflicts between livestock grazing and hunting use, higher mortality from disease due to longer spring confinement, increased trailing use, and decreased hay production due to livestock use of base property hay lands for a longer period in the spring. Reduced trailing use through riparian zones could increase trailing time and operating costs and require more corrals.

Impacts from Wildlife Habitat Management. Developing new land treatment projects and maintaining existing projects would improve livestock distribution and enhance maintenance of existing livestock forage allocations in treatment areas.

Impacts from Forest Management. Forest and woodland harvests would increase forage available for livestock grazing use in most harvested areas. Improved access and thinning would improve livestock distribution. Precluding any development or maintenance of land treatment projects on 47,384 acres would result in a 10 percent loss of forage (1,087 AUMs) over the long-term.

Impacts from Recreation Management. Restricting fencing in portions of the Gunnison Gorge SRMA could preclude the possibility of changing the livestock class from sheep to cattle, and could eliminate opportunities to use fencing to improve livestock distribution.

Impacts from Off-Road Vehicle Management. Limiting vehicle use on grazing areas through closures or restrictions would improve livestock forage, decrease harassment of livestock, and reduce management problems created by ORV use.

Impacts from Disposal of Public Lands. Disposing of 7,522 acres of public land that is currently grazed by livestock would reduce livestock allocations by a total of 786 AUMs on seven "M" category, ten "T" category, and 26 "C" category grazing allotments.

Impacts from Acquisition of Access. Acquisition of public access would improve administration of the livestock grazing program but could result in increased harassment of livestock and vandalism of livestock facilities.

Impacts from Fire Management. Available forage and species diversity would improve on 169,930 acres of public land where fires meeting pre-determined prescriptions would

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be permitted. Fires could cause some damage to livestock facilities (fences, catchments, and corrals).

CUMULATIVE IMPACTS ON LIVESTOCK GRAZING

A net loss of 5,682 AUMs would occur over the long-term, due primarily to disposal of public lands and a 35 percent utilization limit on the riparian and salinity areas. Increased livestock operator costs and increased conflicts with recreational users would occur. The demand for livestock forage would probably not be met over the long-term.

IMPACTS ON FORESTRY

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Forest Management. Intensive management of 24,255 acres of suitable pinyon-juniper woodlands would result in potential annual harvests of 1,213 cords of fuelwood. Suitable commercial forest lands on 3,127 acres would produce 160.5 thousand board feet (MBF) of timber annually. Harvest of 123 acres of suitable commercial forest on 160 acres of land owned by the Girl Scouts of America would be precluded.

Impacts from Mineral Resources Management. Road, pad, and portal construction and other surface-disturbing activities associated with mineral development would reduce suitable woodlands and commercial forest lands to a limited degree. Road construction could improve access into several potential sale areas, thereby reducing costs associated with forest harvest.

Impacts from Riparian/Aquatic Systems Management. Eliminating 482 acres of suitable woodlands within riparian/aquatic zones from harvest would reduce annual fuelwood production by 24 cords. Eliminating 32 acres of commercial forest lands within riparian/aquatic zones from harvest would reduce timber production by 2.5 MBF.

Impacts from Threatened and Endangered Species Management. Eliminating 116 acres of suitable woodlands within the Escalante Canyon ACEC from harvest would reduce fuelwood production by six cords annually.

Impacts from Wildlife Habitat Management. Maintaining existing land treatment projects on 600 acres of pinyon-juniper woodlands would reduce annual fuelwood harvests by 30 cords. Restricting timber harvests on 2,565 acres in the Storm King/High Park area would increase the stand rotation from 120 to 200 years.

Impacts from Livestock Grazing Management. Managing 17,314 acres of suitable pinyon-juniper woodlands for increased forage production could reduce fuelwood harvests by 866 cords annually.

Impacts from Recreation Management. Eliminating 1,311 acres of woodlands within the Gunnison Gorge SRMA from harvest would reduce annual fuelwood harvests by 66 cords.

Impacts from Wilderness Management. Annual harvests of 17 cords of fuelwood would be precluded on 337 acres of woodlands which would be included in the designated wilderness area. The effect on the total forestry program would be minimal.

Impacts from Disposal of Public Lands. Disposal of 1,471 acres of suitable woodlands would preclude potential fuelwood harvests and reduce annual fuelwood production by 74 cords. Disposal of 403 acres of suitable commercial forest lands would reduce annual timber harvests by 30 MBF.

Impacts from Acquisition of Access. Acquiring access into the 11 identified areas would allow harvesting on 1,606 acres of commercial forest lands and on 2,040 acres of pinyon-juniper woodlands.

Impacts from Fire Management. Maximum fire protection in the Storm King, High Park, and North Fork areas would protect 36,800 MBF of commercial timber. Minimum fire protection in the pinyon-juniper woodlands would result in only minor losses estimated at approximately nine cords per acre burned.

CUMULATIVE IMPACTS ON FORESTRY

Multiple-use needs would eliminate sustained yield production on 21,631 acres of suitable woodlands, resulting in an annual loss of 1,083 cords of fuelwood. Harvest on 558 acres of suitable commercial forest lands would be precluded, resulting in an annual loss of 41.5 MBF of timber. Intensive management of the forest resource would result in an annual harvest of 160.5 MBF of timber from 3,127 acres of suitable commercial forest lands and 1,213 cords of fuelwood from 24,255 acres of suitable woodlands.

IMPACTS ON RECREATION

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Recreation Management. Under the proposed plan, recreationists would benefit significantly from management of the variety of recreation opportunities available within the planning area. Managing 47,655 acres (Management Unit 4, Management Unit 14, and Management Unit 15) for recreation would protect scenic values and increase recreation opportunities in these areas.

Designating 1,895 acres within Escalante Canyon as an ACEC would protect the scenic qualities of this valued recreational resource and allow for increased management of the "Potholes" swimming area. Managing 8,942 acres

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north of Delta as an ORV use area and 15,610 acres within the Gunnison Gorge SRMA as open to ORV use would accommodate long-term recreational ORV demands. Developing river access at the Escalante Bridge would facilitate boating use on the lower Gunnison River.

Limiting boating use in the Gunnison Gorge to a maximum of ten group encounters per day would be highly beneficial to recreationists seeking scarce wilderness boating experiences. No Colorado rivers are managed for wilderness experiences. Recreation demand on the six designated wilderness rivers (273 river miles) in the continental United States exceeds the number of use permits available annually. As competition for river-use permits in the Gunnison Gorge exceeds allocations, private and commercial users would experience inconvenience in trip planning and increased possibilities of not obtaining a permit.

Impacts from Mineral Resources Management. Withdrawing 23,390 acres from mineral entry and location, and closing or restricting oil and gas activity surface uses on 30,173 acres would protect the natural and scenic features of these areas from disturbances resulting from mineral activities. Revoking all portions of the BLM protective withdrawal (8,446 acres) and the BOR Fruitland Mesa withdrawal (1,235 acres) located within the Gunnison Gorge SRMA would allow for mineral activities in these areas. These activities would degrade recreation opportunities in predominantly natural areas that are accessed by primitive roads.

Impacts from Salinity Control Management. Limiting vehicle use within the Elephant Skin Wash area to designated roads and trails would reduce the lands available for recreational ORV use by 2,370 acres. This area is presently utilized and preferred for ORV recreation.

Impacts from Riparian/Aquatic Systems Management. Protecting and enhancing 6,320 acres of riparian/aquatic systems would benefit recreationists seeking scenic and educational opportunities within this diverse wildlife community.

Impacts from Wildlife Habitat Management. Management of the Gunnison Forks and Billy Creek habitat management areas, deer and elk winter ranges, elk calving areas, and waterfowl habitats would enhance opportunities for hunting, fishing, and wildlife observation.

Impacts from Livestock Grazing Management. Recreational ORV opportunities would be protected by not permitting placement of livestock facilities that would create safety hazards or impede vehicle use on 8,942 acres.

Impacts from Forest Management. Prohibiting woodland harvests in the Escalante Canyon ACEC and on all but 1,255 acres of the Gunnison Gorge SRMA would protect scenic and predominantly natural recreation settings.

Impacts from Off-Road Vehicle Management. Closing the Gunnison Gorge WSA, the Camel Back area, and the Adobe Badlands ONA/ACEC to ORV use would ensure continued availability of high quality and non-motorized recreation settings in the planning area. Restricting vehicle use to designated roads and trails on 25,182 acres of the Gunnison Gorge SRMA, the Escalante Canyon ACEC, the Needle Rock ONA/ACEC, and in riparian areas would protect the scenic values of these recreation lands. Managing 24,552 acres for recreational ORV use would accommodate long-term ORV use demands and would decrease pressure on areas under ORV use restrictions.

Impacts from Cultural Resources Management. A Class III cultural resource inventory would benefit recreationists by identifying cultural sites with public educational values.

Impacts from Visual Resources Management. Protecting scenic qualities of the Gunnison Gorge WSA, the Adobe Badlands ONA/ACEC, and the Needle Rock ONA/ACEC (VRM Class I) and 15,208 acres of the Gunnison Gorge SRMA (VRM Class II) would ensure continued availability of high quality scenic resources in these areas.

Impacts from Wilderness Management. Designating 21,038 acres within the Gunnison Gorge as wilderness would protect wilderness recreation opportunities in this area.

Impacts from Major Utility Development. Management of 61,327 acres of recreation and wilderness areas as closed to development of major utility facilities would protect high quality recreation settings. Managing 2,478 acres of the Gunnison Gorge SRMA in the Smiths Mountain and Gunnison Forks areas as open to development of major utility facilities would allow for potential deterioration of natural settings within these areas.

Impacts from Acquisition of Non-Federal Lands. Acquiring 2,200 acres within or contiguous to the Gunnison Gorge SRMA would protect recreation settings, provide more public access, and reduce conflicts between recreationists and private landowners.

Impacts from Acquisition of Access. Acquiring public access along the Gunnison Gorge rim southwest of the Gunnison Forks area and from Colorado Highway 92 to the Gunnison River in the Austin area would provide access to high value recreation lands and facilitate recreation opportunities.

CUMULATIVE IMPACTS ON RECREATION

Recreation opportunities would be significantly enhanced and increased under the proposed plan. A total of 74,267 acres would be managed for a wide variety of recreation opportunities including but not limited to river boating, ORV use, wilderness experiences, back country travel, hunting, fishing, and scenic viewing. Revoking the BLM protective

PROPOSED PLAN IMPACTS

withdrawal within the Gunnison Gorge SRMA (8,446 acres) and permitting major utility development in the Smiths' Mountain and Gunnison Forks areas would result in deterioration of recreation values if these lands are developed.

IMPACTS ON CULTURAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Cultural Resources Management. Cultural clearances of areas proposed for disturbance would contribute to the cultural data base, decrease cultural site disturbances, and increase the potential for discovery of sites eligible for inclusion to the National Register of Historic Places. Class III inventories on 5,848 acres would significantly add to the cultural data base. High-value cultural sites on these acres could be protected by special designations.

Impacts from Mineral Resources Management. The no surface occupancy stipulation for oil and gas activities and the closure to disposal of mineral materials on 9,135 acres would protect the integrity of the cultural resources in the area from potentially disturbing activities. Cultural resources on an additional 2,352 acres would be protected by a locatable mineral withdrawal.

Impacts from Off-Road Vehicle Management. Exposed cultural resources would remain vulnerable to vehicle-related damage on the 80 percent of the planning area that would be open to ORV use for all or portions of the year. Cultural resources would also remain vulnerable to vandalism and illegal artifact collection by individuals using vehicles for easy access and transport of artifacts. Closing the 10,402 acres within the Camel Back WSA to ORV use would eliminate vehicle-related damage and reduce illegal collection and site vandalism in this area.

Impacts from Wilderness Management. Designation of the Gunnison Gorge WSA (21,038 acres) as wilderness would generally benefit cultural resources. The integrity of these resources would be protected as no potential would exist for removal of cultural resources as mitigation for surface-disturbing activities.

Gaining knowledge of cultural resources would be impeded as site excavations would not be permitted in most instances. Field surveys, normally required during environmental analyses of proposed surface-disturbing activities, would also be eliminated as a data source. Since stabilization would not normally be permitted, exposed cultural sites would continue to deteriorate over the long-term due to weathering and other natural forces.

Impacts from Acquisition of Access. Acquiring public access to any of the 16 areas identified for access acquisition would increase the potential for illegal disturbance of cultural sites in these areas.

CUMULATIVE IMPACTS ON CULTURAL RESOURCES

Cultural resources would be protected from land uses that require use authorizations but would remain susceptible to vandalism and theft. Vandals and relic-hunters would have easy access to the 80 percent of the planning area that would be managed as open to ORV use for all or portions of the year. With the exception of Class III inventories on 5,848 acres, cultural research would continue to be random inventories and salvage efforts in response to project proposals. High-value cultural sites on inventoried acres could be protected by special designations.

IMPACTS ON VISUAL RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Visual Resources Management. Table 12 lists the acres of land in each VRM classification.

Table 12

ACRES IN EACH VRM CLASSIFICATION: PROPOSED PLAN

| VRM CLASS | ACRES | PERCENTAGE OF PLANNING AREA |
|-----------|---------|-----------------------------|
| I | 27,901 | 6 |
| II | 27,384 | 6 |
| III | 293,417 | 60 |
| IV | 134,375 | 28 |
| TOTALS | 483,077 | 100 |

Impacts from Mineral Resources Management. Mineral development in the planning area would be anticipated to alter the landscape characteristics of a few localized viewsheds.

Impacts from Wildlife Habitat and Livestock Grazing Management. Major vegetation treatments would alter landscape characteristics. Changing VRM classifications in the Billy Creek area from Class II to Class III would increase the allowable visual contrast of projects from low to moderate.

Impacts from Forest Management. Timber and woodland product harvests would alter landscape characteristics in localized areas.

PROPOSED PLAN IMPACTS

Impacts from Recreation Management. Recreation management would maintain landscape characteristics and preserve scenic qualities in the Escalante Canyon ACEC, the Adobe Badlands ONA/ACEC, the Needle Rock ONA/ACEC, and portions of the Gunnison Gorge SRMA. Visual resource protection needs would increase in all recreation areas as viewer volume and sensitivity would increase and viewing distance would decrease.

Impacts from Off-Road Vehicle Management. Managing 80 percent of the planning area as open to ORV use for all or portions of the year would degrade landscape characteristics in these areas. This impact would be most pronounced on 24,552 acres managed for ORV recreation. Changing VRM classifications from Class II to Class IV in large portions of the ORV recreation lands would increase the allowable visual contrast of surface disturbing activities on these lands from low to high.

Impacts from Wilderness Management. Designating the Gunnison Gorge WSA as wilderness would preserve the natural scenic values of the area.

Impacts from Disposal of Public Lands. Disposal of a 40-acre tract adjacent to Colorado Highway 62 and within one mile of the community of Ridgway could result in the loss of a scenic overlook site in a VRM class II area.

CUMULATIVE IMPACTS ON VISUAL RESOURCES

Designating 12 percent of the planning area (55,285 acres) as VRM Class I or Class II would protect highly scenic visual resources. These lands include all the areas that are most used by recreationists seeking natural settings. Designating the remainder of the area as VRM Class III or Class IV would maintain the overall visual characteristics of the planning area but would allow for visually-contrasting projects or disturbances in localized viewsheds.

IMPACTS ON WILDERNESS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Wilderness Management. Designating the Gunnison Gorge WSA as wilderness would permanently protect the high quality wilderness values of this area, which include a pristine environment and outstanding opportunities for primitive and unconfined recreation. The high quality nature of these values is evidenced by the BLM recreation lands designation in 1972, the determination that the area is suitable for wild and scenic river designation, and the Colorado DOW's Gold Medal Trout Fishery designation. The WSA is contiguous to the nationally acclaimed Black Canyon of the Gunnison Wilderness Area, which is administered by the National Park Service (NPS). Designating the Gunnison Gorge as wilderness would expand that wilderness area. It would also permanently protect the

Black Canyon/Gunnison Gorge system as one geologic, ecologic, and physiographic unit.

Not designating the Camel Back WSA and Adobe Badlands WSA as wilderness would prevent the permanent protection of these areas' existing wilderness values, which include pristine environments and outstanding opportunities for primitive and unconfined recreation. The ORV closure on the Camel Back area (10,402 acres) and the ORV closure and restrictions on surface-disturbing activities on 6,783 acres of the Adobe Badlands ONA/ACEC would partially protect wilderness values on these lands as long as this type of management remains in effect. Surface-disturbing activities would be anticipated to impair wilderness values within both WSAs over time.

IMPACTS ON MAJOR UTILITY DEVELOPMENT

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Major Utility Management. Determining which public lands within the planning area are available for development of major utilities provides utility companies with information necessary to plan and design projects. Table 13 lists the acres of public land identified as needed and not needed for major utility development under each management classification.

The following impacts pertain only to those public lands that are identified in the 1980 and 1985 Western Regional Utility Corridor Study(s) as being needed for future development of major utility facilities. Closures or restrictions on lands not identified as being needed for utility facilities would be assumed to have a negligible impact on local and regional major utility development.

Impacts from Coal Management. Managing 3,511 acres of the Paonia/Somerset coal planning area as closed to major utility development would restrict future development of these facilities to a one-half mile wide corridor adjacent to Colorado Highway 133. This management would result in a low adverse impact to future major utility development as this corridor is anticipated to accommodate future major utility needs in this area. Route options available to utility developers would be reduced.

Future major utility development would be precluded on public lands in the Terror Creek drainage. Utility development linking the Montrose and Rifle areas would be restricted as Terror Creek is one of two important utility corridors connecting these areas. These lands are presently utilized for a 235 kv electrical transmission line. Utility companies could not utilize this route nor realize the cost/benefits of grouping new and existing facilities; they would be required to utilize lands adjacent to Colorado Highway 133 or private lands adjacent to the Terror Creek drainage.

PROPOSED PLAN IMPACTS

Table 13
MANAGEMENT OF PUBLIC LANDS FOR MAJOR UTILITY DEVELOPMENT:
PROPOSED PLAN

| MANAGEMENT CLASSIFICATION FOR DEVELOPMENT OF MAJOR UTILITIES | ACRES OF PUBLIC LAND | | TOTALS |
|--|--|--|----------------|
| | Identified as needed for major utility development | Identified as not needed for major utility development | |
| Open | 98,612 | 202,394 | 301,006 |
| Sensitive | 934 | 5,762 | 6,696 |
| Seasonally closed | 22,739 | 70,598 | 93,337 |
| Closed | 3,511 | 78,527 | 82,038 |
| TOTALS | 125,796 | 357,281 | 483,077 |

Source: 1980 and 1985 Western Regional Utility Corridor Study(s).

Both of these options would probably be less desirable and cost-effective than utilizing existing routes.

Impacts from Soils and Water Resources Management. Construction and major maintenance of new utility facilities would not be permitted on 11,062 acres from March 1 through May 31 if necessary to protect wet soils. Utility companies would experience operating inconvenience on these areas from April 15 through May 31, based on a typical construction/maintenance season of April 15 to October 15.

Impacts from Riparian/Aquatic Systems Management. Major utility development would not be effected on 557 acres as vegetation rehabilitation would mitigate surface disturbances over the long-term.

Impacts from Threatened and Endangered Species Management. Management of two tracts of land totalling 377 acres (Management Unit 13) as closed to buried major utility facilities and limited to no surface disturbance from above-ground facilities to protected threatened and endangered plants and their habitat would have a low impact on utility development. These tracts could easily be avoided during planning and placement of utility facilities.

Impacts from Wildlife Habitat Management. No construction and major maintenance of new utility facilities would be permitted on 11,677 acres of crucial deer and elk winter range from December 1 through April 30. Utility companies would experience operating inconvenience in these areas from April 15 to May 1, based on a typical construction/maintenance season of April 15 to October 15.

CUMULATIVE IMPACTS ON MAJOR UTILITY DEVELOPMENT

Management under the proposed plan would result in a low adverse impact to major utility development. Seasonal restrictions on construction and major maintenance on 18 percent of the public lands identified as needed for future utility development would result in operating inconvenience and potential cost increases for utility companies. Restrictions would be most significant in the salinity control areas (11,062 acres) where one-quarter of the typical construction season would be under this seasonal operating restriction.

Excluding major utility development within the Terror Creek drainage would restrict utility development linking the Montrose and Rifle areas to alternate and possibly less desirable and cost-effective routes.

IMPACTS ON ACCESS

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Acquisition of Access. Acquiring access into 16 areas would improve administration and allow for public utilization of these public lands.

IMPACTS ON ECONOMIC RESOURCES

IMPACTS FROM PROPOSED MANAGEMENT ACTIONS

Impacts from Coal Management. Present and future demands for coal in Delta and Gunnison counties, with market values ranging from \$31 million to \$103 million annually (1984 values), would be met over the life of this

PROPOSED PLAN IMPACTS

plan. Meeting coal demands would have a corresponding positive impact on generation of local incomes and royalties paid to federal and state governments. Coal production costs would be anticipated to increase slightly within the riparian, aquatic, and crucial winter range areas where requirements for additional mitigation or seasonal restrictions would be applied.

Impacts from Locatable Minerals Management. Economic benefits associated with the unknown mineral potential on 32,750 acres of withdrawn lands would not be achieved.

Impacts from Soils and Water Resources Management. Completing and maintaining the Elephant Skin Wash salinity control project would contribute to lower water treatment costs downstream. During the life of the plan, the projected reduction in salinity of 1,434 to 2,209 tons would serve to lower salinity costs in the Colorado River Basin by \$83,172 to \$128,122. Any additional projects would have similar economic benefits. The local economy would benefit from slightly increased soil productivity and reduced costs for less frequent removal of reservoir sedimentation.

Impacts from Livestock Grazing Management. Current trends and conditions associated with management of 32,607 AUMs, valued at \$247,813 (1985 values), would continue. These AUMs represent a decrease of 5,677 AUMs, valued at \$43,145, from the existing situation. Any loss of AUMs could result in financial losses for the affected ranching operations.

Impacts from Forest Management. The sale of forest and woodland products would produce about \$19,267 in federal revenues annually. These revenues would be nearly the same as the average annual revenues since 1981. Local employment and income would be supported to the extent that timber and woodland harvesting would be by local commercial cutters and sold locally. The sale of 1,213 cords of fuelwood annually would offset local residential heating costs.

Impacts from Disposal of Public Lands. The disposal of the 143 tracts of public land (totalling 11,026 acres) within the planning area which are identified as suitable for disposal could result in revenues ranging from \$3 million to \$6 million, based on estimated average sales prices of \$300 to \$600 per acre. Disposal would occur over a period of several years, with receipts going primarily to the Federal treasury. These receipts would represent less than one-tenth of one percent of estimated Federal revenues and are not, therefore, significant.

CUMULATIVE IMPACTS ON ECONOMIC RESOURCES

The cumulative impact on the local economy is likely to be beneficial but not large. The loss of AUMs could result in financial losses for ranching operations. Development of coal, water, forest, and recreation resources could offset any negative economic impacts from losses of AUMs.

PREPARATION AND DISTRIBUTION

LIST OF PREPARERS

Bureau of Land Management staff and resource specialists who provided resource data, coordinated input and revisions, and responded to public comments during the development and preparation of the Proposed Resource Management Plan and Final Environmental Impact Statement are listed as follows:

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Cultural Resources

DISTRIBUTION OF THE PROPOSED RMP AND FINAL EIS

This Proposed Resource Management Plan and Final Environmental Impact Statement will be distributed to approximately 900 addresses, including all addresses to which the Draft RMP/EIS was sent (see the *Review of the Draft RMP/EIS* section of this document). The original distribution list for the Draft RMP/EIS has been expanded to include those individuals, organizations, and agencies who testified at the public hearings, submitted written comments, or requested copies of the draft.



APPENDIX A

STIPULATIONS FOR OIL AND GAS LEASES

The following stipulations would be added to future oil and gas leases on both federal surface and split-estate lands where assigned for each management unit (see beginning page 146). The actual wording of these stipulations may be adjusted at the time of leasing to reflect future legislation, court decisions or policy changes; however, the protection standards contained in these stipulations would be maintained. Any change to the protection content of the stipulation would require an amendment to the RMP/EIS.

Highly Erodible and/or Saline Soil Areas

Stipulation: To protect watersheds from salinity infusions and to protect highly erodible soil areas where low soil productivity would prolong or disallow revegetation, all development activities (exploration, drilling, etc.) will be allowed only from June 1 through February 28. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on salinity and highly erodible soil areas. The stipulation would not be waived, excepted, or modified if it is determined that the activity would cause accelerated erosion that would result in excessive amounts of salinity being contributed to the Colorado River. Variances could be allowed if soils are not saturated during the typical high soil moisture period when these soils are most susceptible to damage (March 1 through May 31), or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (small amount of disturbance, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it

is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Threatened, Endangered, Candidate, and Sensitive Plant Areas

Stipulation: To protect the threatened, endangered, candidate, and sensitive plants and their potential habitat within the Escalante Canyon Area of Critical Environmental Concern and the Fairview Research Natural Area, an area of critical environmental concern, no surface occupancy would be permitted in these areas. Exceptions to this restriction may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on threatened, endangered, candidate, and sensitive plants and their potential habitats within these areas.

Bald Eagle Winter Concentration Areas

Stipulation: To protect bald eagles from activities that would cause abandonment of winter concentration areas, all development activities (exploration, drilling, etc.) will only be allowed in these areas from May 1 through November 30. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on wintering bald eagles.

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by

APPENDIX A

the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Crucial Deer and Elk Winter Ranges

Stipulation: To protect crucial deer and elk winter ranges from activities that would cause these species to abandon areas of crucial winter forage and cover for less suitable ranges, all development activities (exploration, drilling, etc.) will only be allowed from May 1 through November 30. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on deer and elk utilization of crucial winter ranges. Variations could be allowed if these crucial ranges are not being utilized due to mild winter conditions or temporary changes in winter range utilization, or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (small amount of disturbance, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision

to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Elk Calving Areas

Stipulation: To protect elk calving areas from activities that would force elk to abandon these areas during critical calving periods, all development activities (exploration, drilling, etc.) will only be allowed from July 16 through April 14. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on calving elk.

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Waterfowl Habitat

Stipulation: To protect waterfowl from activities that would alter breeding behavior, increase the incidence of nest abandonment, and decrease breeding success, all development activities (exploration, drilling etc.) will only be allowed in waterfowl habitats from July 1 through March 14. Exceptions to this limitation may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on

breeding and nesting waterfowl. Variances could be allowed if these breeding habitats are not being utilized, or if impacts could be mitigated, or if site-specific conditions do not warrant the stipulation (few individuals affected, short duration of operations, etc.).

Resource information for split-estate lands has not been verified by the BLM. Verification will occur during review of Applications for Permit to Drill (APDs). On-site inspection and consultation with the surface owner and operator may reveal that (1) the impacts addressed by the stipulation will be avoided or mitigated to an acceptable level, or (2) the resources of concern are not present. Upon either of these determinations by the Authorized Officer, the stipulations can be waived, modified, or excepted without public notice other than that provided for the APD. If, after on-site inspection and consultation with the private surface landowner, it is determined by the Authorized Officer that conditions necessary to avoid impacts to private resources would adversely impact the public resources addressed by these stipulations, the impacts will be assessed. If, based upon such assessment, the Authorized Officer makes a decision to substantially change or waive one or more stipulations, a 30-day public review period will be provided in addition to the public notice period for receipt of the APD.

Outstanding Natural Areas

Stipulation: To protect the scenic, natural, and scientific values of the Adobe Badlands Outstanding Natural Area, an area of critical environmental concern, and the Needle Rock Outstanding Natural Area, an area of critical concern, no surface occupancy would be permitted within these areas. Exceptions to this restriction may be authorized in writing by the BLM's Authorized Officer. The affected portions of this lease are (legal description).

Reasons for Exceptions: This stipulation may be waived, excepted, or modified by the Authorized Officer if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts on the scenic, natural, and scientific values of these areas.

Wilderness Study Areas

Stipulation: Wilderness Protection Stipulation Form CSO 3000-1 (July 1980) is attached per Washington Office Instruction Memo No. 80-509 (5/12/80). This memo implements the Interim Management Policy and Guidelines for Land Under Wilderness Review (12/12/79 and amendments).

Reasons for Exceptions: This stipulation would be attached to all leases involving lands within WSAs, and would apply until these lands are released from WSA status.

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DENVER, COLORADO 80225

ACRONYMS

| | |
|--|--|
| ACEC: Area of Critical Environmental Concern | ORV: Off-Road Vehicle |
| AMP: Allotment Management Plan | PLO: Public Land Order |
| APD: Application for Permit to Drill | PSD: Prevention of Significant Deterioration |
| AUM: Animal Unit Month | RAMP: Recreation Area Management Plan |
| BLM: Bureau of Land Management | R&PP: Recreation and Public Purposes Act |
| BOR: Bureau of Reclamation | RMP: Resource Management Plan |
| CFR: Code of Federal Regulations | RNA: Research Natural Area |
| DOW: Colorado Division of Wildlife | ROD: Record of Decision |
| EA: Environmental Assessment | RPS: Rangeland Program Summary |
| EIS: Environmental Impact Statement | RS: Revised Statutes |
| EO: Executive Order | SRMA: Special Recreation Management Area |
| EPA: Environmental Protection Agency | T&E: Threatened and Endangered |
| FERC: Federal Energy Regulatory Commission | TPCC: Timber Production Capabilities Classification |
| FLPMA: Federal Land Policy and Management Act | UBRA: Uncompahgre Basin Resource Area |
| FMP: Forest Management Plan | USD: U.S. Department of the Interior |
| HMP: Habitat Management Plan | USFS: U.S. Forest Service |
| KGS: Known Geologic Structure | USFWS: U.S. Fish and Wildlife Service |
| kv: kilovolt | USGS: U.S. Geological Survey |
| MBF: Thousand Board Feet | VRM: Visual Resource Management |
| MSA: Management Situation Analysis | WSA: Wilderness Study Area |
| NPS: National Park Service | WTS: Wilderness Technical Supplement |
| ONA: Outstanding Natural Area | |





