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

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

[Signatures]
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 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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- Distribution of the Proposed RMP and Final EIS

## APPENDIX

- Appendix A: Stipulations for Oil and Gas Leases

## ACRONYMS
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Proposed Plan
SUMMARY OF THE PROPOSED PLAN


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/AEC were changed from standard lease terms to leasing with no surface occupancy. Leasing conditions for the Adobe Badlands ONA/AEC 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/AEC, previously open for 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/AEC, 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/AEC 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 need 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.
## Table 1

**PERSONS WHO TESTIFIED AT THE PUBLIC HEARINGS**

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<td>W.N. Brunner; Paonia, Colorado</td>
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<td>Mark Welsh; Hotchkiss, Colorado</td>
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<td><strong>H-4</strong></td>
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<td>Caleb Gates; Paonia, Colorado</td>
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<td>Stephen F. Hinchman; Paonia, Colorado</td>
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<td>Mark Paigen; Paonia, Colorado</td>
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<td><strong>H-9</strong></td>
<td>Gerrie Wolf; Cedaredge, Colorado</td>
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<td>Hank Hotze; Gunnison River Expeditions; Hotchkiss, Colorado</td>
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<td>Robin Nicholoff; Hotchkiss, Colorado</td>
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<td>John Groome; Paonia, Colorado</td>
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<tr>
<td><strong>H-13</strong></td>
<td>Jerry Price; Whistling Acres Ranch; Paonia, Colorado</td>
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### PERSONS WHO SUBMITTED WRITTEN COMMENTS

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<td>U.S. Fish and Wildlife Service; Fish and Wildlife Enhancement; Grand Junction, Colorado</td>
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<td>Sierra Club Southwest Office; John Bradley; Boulder, Colorado</td>
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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 alphanumerics (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 alphanumerics 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.
Thank you for your attention.

JOHN SINGLAUB: 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 SINGLAUB: 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 area, and I would just like to say that we have been working with Congressman Ben Nighthorse Campbell's group to resolve some problems of our water rights in that canyon to try to make it into a national mark instead of a national monument. This does not address what they plan to do with the City of Delta's water rights. And we haven't to know that they are valid water rights, and we don't think that's 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 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 summary 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...
in pretty bad shape, or under a lot of pressure from either livestock or wildlife. It yet goes on to come up with these really optimistic ideas about how much erosion is going to increase over the district with very little real data on it. There's hardly any data in the whole thing. That's why I made comment that there's not enough here for a person to look at it and really be able to make an informed decision.

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

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

And even with the amount of data that the Forest Service put out in the NGO plan, that plan is under remand.
preferred alternative there was more, we're opening up more
use to ORV use than is current, did you say that?

W. N. BRUNNER: I believe that's what's going to
take it in the Chapter 3, preferred alternative,
off-road vehicle use on public lands will be open to
ORV use.

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

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

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

I've gone through this plan, I've read most of
it and to no it was not evident that this has been done.

water supplies.

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

In the past there have been very good decisions
made by the Bureau of Land Management, there was a con-
census worked out with ditch people, the coal industry and
the BLM and environmentalists in the past to try to resolve
some of these issues. None of the past controversies in-
volving development in this area are evident, either in
the methodology in this document, or in the decisions. And
I would strongly urge the BLM to take a past, unlike the
Veal. BLM sat down with all of the users and try
to not only improve their document, but to come up with
management decisions that recognize the real resource con-
flicts and the competition that we all have on how do we
want the public lands to take care of us. That has not been
done in the past.

On the last two land use plans that have come out
of this area have resulted in legal challenges, and I think
by now the BLM should learn that there's a different way
to do business, and by trying to save paper here, by leaving
out information, detracts from the purpose of the document.
I can't tell how I'm going to be affected. My neighbors
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 good and should be encouraged and the BLM should be applauded for making that recommendation. I think it's a very worthwhile place to be a wilderness.

As for 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 about 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 Badlands-type formations, or "adobe" hills, where coloration changes abruptly with shifts in..."

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 mixes 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 specific 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 Mark 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 running on, they cannot be voluntary, but they must be mandatory. And what...
they must be, they must be no wood burning, they must be fire pan used. They must use portable stoves, you know, you can't --

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

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

That's about it, thank you.

JOHN SINCIAUDE: Thank you, John.

Caleb Gates.

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

JOHN B. BENJAMIN: Jon Sering again, if I would ask a clarifying question.

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

JOHN B. BENJAMIN: Jon Sering again, if I would ask a clarifying question.

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

JOHN B. BENJAMIN: The vehicle access.

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

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

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

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

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

Thank you.

STEPHEN F. HINCHMAN: Hi-I-n-c-h-m-a-n.

JOHN SINCIAUDE: Thank you.

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

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

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

So I packed up the BLM and the RMP and went out there myself and spent two days and nights in the Camel Back to do my own study. I found the Camel Back to be more than suitable, I found it delightful.

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

The canyon is not the kind of place that you escape from go get away from it all when you go to the wilderness, it's more like the feeling or 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 over-
grazed to me and fatigued by invading sage. Lots of lonely
pinyon trees, and I took some siestas in the cool draw.

I heard a hawk, but it wouldn't come close enough to identify,
it's hoppy, but it's flat country in the incomprehension
Platteau, even though you're up there. I enjoyed it a lot and
I had a lot of alone opportunity for solitude, I would tell
I was alone.

The next day was similar and quiet. From the
canyon walls of Roubideau Creek, lots of ponderosa pines,
willows and cottonwoods against the entrada. By this time
I was thirsty, my lone quart of water down to a few sips,
"t's choppy, I mean, yO"r cows in my wilderness
The canyon walls of Roubideau Creek, lots of ponderosa pines,
willows and cottonwoods against the entrada. By this time
I was thirsty, my lone quart of water down to a few sips,
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 WIP/EIS, trans-
slating from it heavy bureaucratics into plain English. And

In the bush 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,
diesel carb, air polluting, earth crunching beasts. That
combined with --
(Laughter.)
But that amounts to single use, it's not the
sacred multiple use verbage 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 how has what,
one enforcement officer in the whole area. Without enforce-
ment, there is no real restrictions. So I threw 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

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-four 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 over-
grazed. In fact, your plans you will reduce the grazing
allowment 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 Roubideau 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
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 utilize ORV's unless, which you state

for wilderness designation. And according to the wilderness
Act of '64, the designation is this, a wilderness, in con-
trast 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 reservation
and use in unimpaired condition. It may also contain
ecological, geological or other features of scientific;
educational, scenic or historical value.

JOHN SINGLAUB: Five minutes.

CALEB GATES: Okay. I'm just going to close up.
Camel Back meets those criteria. Your recommenda-
tion of unsuitable 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
the environment. We must, for the environment sustains our bodies, but as humans we also require support for our spirits. And this is what those kinds of things provide. The catalyst converts any physical location, any environment, if you will, into a place that is a process of experiencing deeply. A place is a piece of the whole environment that has been claimed by feelings. Used simply as a life support system, the earth is an environment. Used as a resource it sustains our humanity. The earth is a collection of places. We never speak, for example, of an environment that we have known, it is always places we have known and recall. We are homesick for places, we are reminded of places. It's the sounds and smells and sights of places which haunt us and against which we often measure our presence.

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

Thank you.

MARK PAIGEN: Thank you.

PAOITA and I represent myself.

I also guide down the Gunnison Gorge, so I've been there quite a bit and I've seen it quite a bit over the last four years. I guess I'll talk about that first.
Creek and the high salinity there. Opening up this canyon would impact that.

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

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

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

My post office box is 604 and I'm currently operating as a company by the name of Gunnison River Expeditions, who currently operates on the Gunnison Gorge, and the oldest licensed outfitter in the Gunnison Gorge.

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

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

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

JOHN SINGLAUB: Correct.

GENE VECCHIA: Hank, are you talking about on the addition to the Wild?

HANK HOTZE: Right.

GENE VECCHIA: That's a different document.

HANK HOTZE: A number of people are commenting on those issues and I --

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

HANK HOTZE: Fine. To be brief, the BLM in my opinion is correct in suggesting that the Gunnison Gorge be designated a wilderness area, as well as a wild And scenic river.

It's my recollection that, based on what I've read in your Wilderness Ventilation to the "W", the Mule's B, and the camel back or Kniebusch also qualify for wilderness designation. And those areas are currently pristine, and they harbor lots of wildlife, and they are some of the best lakes in the area. And something that nobody continues to overlook is that those resources are finite. What we are designating here, we are determining that we should destroy something that can't be restored, and those areas currently are not being used commercially to any value that we know of, and they should be preserved, especially in light of the decline -- some of the people in this room have a vested interest in these areas, and I apologize, but a fact is a fact -- that the decline in agriculture, and the decline in mining in the state of Colorado and the State Government's direction to promote tourism and recreation. Those areas provide, or will provide the finest of those things. If we destroy them at this point for no real reason, as you have admitted in your plan, there's no real justification, then these areas will be gone.

We are seeing a tremendous increase, I'm a guide and outfitter, we are seeing a large increase in the area in interests in areas such as these, and they are bringing in tourist dollars. They are bringing in dollars that may...
They pay at the gas station and at hotels and restaurants, and they're buying crafts, and they're buying fruit and they leave, the people that hand out these dollars. And they give the local economy a tremendous boost, and if you destroyed those things you will never be able to bring them back.

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

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

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

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29 towards education fines and enforcement second. But they should have the dual capability.

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

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

JIM FERGUSON: Thank you.

JOHN SINGLAUB: Thank you.

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

JIM FERGUSON: Thank you.

JOHN SINGLAUB: Thank you.

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

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

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

For example, I refer to the Uncompahgre Basin

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For example, I refer to the Uncompahgre Basin...
which lands are private and which are public. How will restrictions of off-road vehicle use be enforced. The BLM personnel apparently have no citation authority, which makes enforcement extremely questionable.

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

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

The environmental impact: invasiveness actions are simply not addressed.

I'm concerned with BLM's ability to follow its own regulations and constraints placed upon it by this and supporting documents. For example, the aforementioned grazing EIS states on page 1-19 that "equipment would reach the job site over existing roads or trails." And this is with regard to chaining and reseeding projects.

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

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

Adobe Badlands wilderness study area makes for not recommending inclusion in the wilderness system.

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

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

JOHN SINCLAIR: Five minutes.

ROBIN NICHOLOFF: Pardon?

JOHN SINCLAIR: Five minutes.

ROBIN NICHOLOFF: "the U.S. Forest Service recently approved two new areas near Paonia Springs, we are looking at the expansion of the Vail ski area by 50 percent, Powderhorn is expanding. There are many for sale signs at ski areas around Colorado. I guess vendors, do we really need another ski area, specifically one that may impact critical elk habitat."

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

JOHN SINCLAIR: Thank you.

all of them and other specifications were violated when on September 19, 1982, bulldozers under contract to the Bureau of Land Management trespassed on that private land to begin implementation of the Wolf Park chaining project.

Page 4-5 of the Grazing EIS states that "if modifications are needed into existing NEPA, an environmental assessment report would be completed prior to implementation."

Several days after site work had been done on the Wolf Park chaining, the BLM District Manager issued a NEPA categorical exclusion in flagrant violation of Federal law and agency recommendations or regulations.

I wish that you not misunderstand me, I'm not opposed to livestock grazing on public lands, nor to imposing to improving grazing conditions for wildlife and livestock. I'm opposed to establishing regulations and procedures, priorities and plans for implementation of objectives, and turning around 180 degrees and not following them.

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

Briefly on just a couple of other points, I can find no justification for not including the Camel Back and Adobe Badlands wilderness study areas for not recommending inclusion in the wilderness system.

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JOHN SINCLAIR: Thank you.

John Green.

JOHN GROOME: It's Groom, G-R-O-O-M-E?

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

JOHN GROOME: That's hard to read. My name is John Groome and I live at Paonia, and I would like to comment on three things.

First of all, I'd like to say thank you to the BLM for their wilderness designation for the Gunnison Gorge. I think it needs it. I think also the Camel Back and the Adobe Badlands meet all the criteria for wilderness.

Wilderness is a diminishing resource within this country, and we need to preserve all that we can.

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

Thank you very much.

JOHN SINCLAIR: Thank you, John.

Jerry Price.
Jerry Price, Paonia, Colorado, I represent Whistling Acres Ranch.

I deal with a lot of things that we are talking about: we grade cattle, we haul trash, we build, we take people on off-road ventures, we do it all in the area. Some of the areas 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 our hunting, people that shoot 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 Yet Cree grazing. I've spent over $3,000 worth of my men's wages into taking care of 100 hundred acres of BLM that I need in these days and some 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 me feel kind of funny when they're down because they're not quite alone out there as they think they are. Most of them don't carry swimming suit.

I've rode my horse into canyons 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 crime and I heard your crime and if we put it all together we would get somewhere.

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

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 heard your points and if we put it all together we would set somewhere.

Bill?


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.)
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 Gunnison 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 P&P, 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.

Cameo 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.

Cari Gerity.

MR. GERITY: Thank you for this opportunity to present these comments regarding the Draft Uncompahgre
Basin Resource Management Plan/Environmental Impact

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

MR. GERITY: I will. My name is Carl Gerity 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 MT 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 classified as coal lands.

MR. SINGLAUB: Thank you, Carl.

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DENVER COLORADO

Bill Foreman.

MR. FOREMAN: My name is Bill Foreman. I live at 803 Ithica 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, Camelback and Adobe Badlands for preservation and protection under wilderness designation.

One thing that was stated in all the testimony 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 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 600 Tantara 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 it's 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
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.

MR. ROBERTSON: Okay. My name is Todd Robertson. I live at 6630 East Maine 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 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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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.

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 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 affect on the status of these species. I have a hard time imagining that ORVs and increased grazing wouldn't have an affect on these endangered species.

I'd like to also comment on two other areas of critical environmental concern, the Escalante Canyon. You
a responsibility to provide a certain amount of this
wilderness for the people of Colorado and the people of the
nation to use and enjoy and provide refuges from development.
In this light, the recommendations are not
entirely to my liking. I do like the recommendation for
Canyon Creek to be wilderness. This area is, I understand,
quite outstanding for river based recreation and also land
based recreation. I'm glad to see you recommended it.
I don't really understand, however, why the
BLM did not recommend the other two areas for wilderness
designation. There appear to be very few conflicts. Camel
Back, especially, has low mineral potential. There are no
existing leases or claims according to the Wilderness
Technical Supplement. There are three species of threatened,
endangered, or candidate for one of those listings, species
of plants. And under the preferred alternative, this area
would be managed, I believe partially for riparian
management, which protects riparian ecosystems. And also
there would be limits placed on off-road vehicle use. It
seems to me that wilderness would accomplish the same goals
and probably do than just as well, if not better.
Also, I believe Camel Back is contiguous to
some Forest Service areas on the Imnacahgappe Plateau that
were at one time recommended for wilderness, and maybe
some day putting two wilderness systems. So I believe Camel
Back should be recommended for wilderness designation.
Adobe Badlands, 10,425 acres. This area does
not have a great deal of conflicts either. The coal in the
northern portion of the technical supplement admits that
industry does not appear to be interested because there's no
transportation system in place and there are no other mines in
the area. There appears to be, at least theoretically, a
moderate value for oil and gas. But there have already been
dry holes and, therefore, industry does not appear to be too
interested. So further activity is unlikely. The same with the
mining claims. Additional activity is not expected there.
Under the preferred alternative for Adobe
Badlands, there would be wilderness control measures
undertaken, grazing would be reduced, and OHV use would
be closed on 8,358 acres. And, also, somewhere in the RMP
there's a mention of possibly establishing a herd of big horn
sheep. I don't see why wilderness would not do the same
thing and do it better. All of the things that would be
undertaken under the preferred alternative could be
accomplished probably better by wilderness designation.
A few other parts of the plan are of concern
to me. The approval of a ski area at the Storm King Mountain
site appears to me to be unwarranted. First of all, we don't
need another ski area in Colorado. We've got too many
resorts, and I'm co-director of the Wilderness Study Group
from the University of Colorado. My address is 585 Pica,
Boulder, Colorado, 80302.
I'd like to recommend that Camel Back, Uncompahgre
Butte, and the Adobe Badlands be recommended as
wilderness. I recommend these due to their outstanding
wilderness characteristics and the few conflicts of interest
within the areas. I don't really understand why they weren't
recommended due to the lack of conflicts in the areas and the
admission that they do have good wilderness characteristics.
Also, I'd like to point out the presence of the
spineless hedgehog and the hoehneck cacti in these areas.
I know you put that in the technical supplement.
On the areas of critical environmental
concern I would like to recommend new surface occupancy,
no stock grazing, and a mineral withdrawal, total mineral
withdrawal. Also, the new camping facilities and bathing
improvements I think are not compatible with the area of
critical environmental concern.
I'd like to point out that the wilderness
recommendations of all three areas is very small. Like was
pointed out before, it's only 8.6 percent of the area and I
wish it could be more. But if I can get that much, I'd like
to take it.
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. Singlaub. 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 Roubideaux because I think a lot of people, if they go there, they could find a lot of personal benefit from both those areas. And I hate talking in front of people because it just scares me. Thank you.

Mr. Singlaub. 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 cutback 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 be opposed in difference to the elk grazing land.

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

Mr. Singlaub. You're among friends. Don't worry about it.
that I think that Mr. Morck, and Mr. Burford, and Mr. Model
should know that you are nowhere 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 Uncompahgre 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 need for wilderness for
epilover of civilized 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 skimpy

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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. KOEPSEL: 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. KOEPSEL: 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 Nee婉(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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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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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 these 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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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 so 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. Where are nor totally civilized people like me going to go for the recreation? Thank you.

MR. SINGLAUB: Eleanor Von Barger.

MR. VON BARGER: My name is Eleanor Von Barger. I live at 5555 East Yale, apartment 3, 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 command you for giving them...
We request that you protect Eriogonum pelinophilum, Penstemon retortaurus in the Fairview Research Natural Area, Sclerocactus glaucus in the Gunnison Gorge Wilderness Study Area, Echinocereus triglochidiatus varianewitzii and Astrelogus lophophorus in the Camel Back Wilderness Study Area, Sclerocactus glauces in the Adobe Badlands, as well as the listed plant species and the unique plant associations found in the Escalante Canyon.

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

MR. SINGLAUB: Thank you.

MR. HATFIELD: My name is Scott Hatfield. I live at 1115 Marine, 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.

We 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, you know, there's wild areas and, you know, they have visions kind of like Yellowstone Park a lot, and they 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 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: 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 Uncompagre 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 end 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 features why these ski areas or ski area development in that area would be a bad idea, specifically, climate, economics, etcetera.

I recommend that you manage Escalante Canyon as an area of critical environmental concern. That's an 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 livestock 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 values 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 177 people, I believe it is, who have spoken so far, eight of them before me 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 generally, 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...
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 Dominquez 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 if 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 non-recommended wilderness area or not -- I see no reason for that having any bearing on whether an area be selected, if the area by itself qualifies for wilderness designation. And, secondly, the proximity of the Dominquez recommended wilderness area, 70,000 acres nearby, I feel comes right back in 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 Dominquez 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, etcetera, 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 and undeveloped state. You notice in those 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 Cimarron Ridge or elk calving. Are you talking about the Storm King back 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 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
Back and Adobe Badlands need to be added also as wilderness recommendations.

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

One of the things that always disturbs me in a management plan, especially on these two areas, Camel Back and Adobe Badlands, where I don't think that any other specific uses are being proposed, is the BLM and its employees are fallible and can make a mistake. I would much rather see that mistake made in making these areas wilderness. If that was or does turn out to be, and that later generations decide that it was a mistake to make Camel...
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 WMA 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 keep it in 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 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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80433. I am representing the Colorado Environmental Coalition as their public lands coordinator.

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

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

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

Consideration of multiple use trade-offs were ignored once again. And the Secretary also outlined criteria for other issues that should be covered. Wet lands and riparian habitats, sole source aquifers, class I POC areas, buffer zones to national parks. Once again, none of these issues are mentioned in the BLM.

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

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

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

Connors v. Burford talked of the role of the federal agency in the mismanagement of the oil and gas leasing system and stated that they have initiated a pattern of procrastination, no examination, of environmental concerns. And I think it's sought now in being included in the Resource Management Plan.

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

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Escalante Creek to protect the resources there. On the Fairview R and A, once again we support a livestock ban, a mineral withdrawal for the unit, and no surface occupancy for the oil and gas leasing.

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

On wilderness, we support all three units as wilderness. The Gunnison Gorge is one of the premier recreational places in Colorado. The 27givers??? from Black Canyon by having an upper canyon covered by sedimentary rocks which the Black Canyon lacks. The Gunnison River is also an incredible white water adventure, and it's an area that just recently I have gone with Jerry Mallett and visited and found it to be incredibly impressive. Adobe Badlands has impressive scenic values. It includes some endangered species including the Uintah Basin hookless cactus, and it would add, I think, some diversity to Delta's economy by increasing the recreational attractiveness of Delta.

On Camel Rock, it's another area I've spent some time visiting and found the canyon to be spectacular and much different from Dominquez. Dominquez is the Entrada sandstone and the slip rock canyon very typical of Utah. And
Domínguez or the Camel Back Unit in Roubideau Canyon just barely begins cutting into the Entrada, and includes the upper layers of the 7Wm"res... I think it's capped with the Dakota sandstone. So it's a much different unit than Domínguez 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 have no delineation of utility corduroys across the BLM lands and those units, and I think that 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 is been no such survey yet on the resource area and it's something that's necessary.

And finally, riparian vegetation, I found 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 4-50 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. SINGHAUB: 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.
who did not get a chance to ask questions prior to the
hearing that the BLM staff will be available for informal
questions and answers after the hearing.

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

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

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

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

JOHN SINGLAE: Sure.

DEBORAH GORE: I prefer not to start it.

JOHN SINGLAUS: Okay, Richard Gore.

(Laughter.)

We have got a lot of Gores on this list.

RICHARD GORE: I'd rather wait until later.

JOHN SINGUUE: Kenneth Gray.

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

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

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

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

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

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

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

Thank you.

JOHN SINGLAUS: Thank you.

GENE VECCHIA: One question, Tom. When you talked
about curbing ORV use, are you talking about the entire
planning area, or just certain specific areas?

THOMAS GORE: No, sir, the entire planning area.

I am just appalled at the damage these darn things
can do.

GENE VECCHIA: Thank you.

JOHN SINGLAUS: Jo Gore.

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

(Laughter.)

Jo Gore, 445 Highway 348 in Delta, I am a permittee
I am opposed to Camel Back used as a wilderness
area, recommendation as a wilderness area. The Camel Back
does not lend itself as a wilderness area. It certainly
would be hard to manage, and it is not -- does not meet
all the requirements of the wilderness.

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

The riparian habitat, where they have proposed
that on the Robidoux area, to begin with, I always thought
that a riparian habitat had to be in an area where there
was water. The Roubideau goes dry and is dry many months out of the year and would not lend itself. Then when they have a hard rain up above, the water comes down, or the floods come down and wash the dry sand and gravel and rock, so the Roubideau should not be into riparian habitat. If it was into a riparian habitat and properly managed, it would increase the AUMs rather than decrease the AUMs as proposed for the area.

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

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

I would also like to see the recreationists and the backpackers pay their fair share of use of the public lands. They have had the use of the public lands all of this time, newer paid one cent for management. Livestock, mining, timbering do more than pay their way of the use of these lands. And I would certainly like to see the other people using the lands start paying their fair share.

Thank you.

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

All of the features, plus a whole bunch of other ones that are obvious to anyone who goes up there, including the spectacular scenery, a pretty substantial perennial stream, the historic site of Men Lowe's cabin, and other unique features such as the tremendous hoodoo right there below the Camel Back that's made out of unconsolidated sediments, just capped by a big piece of entra... sandstone. It just towers there without tipping over, which is quite impressive.

All this evidence demands that the BLM reconsider its recommendation and find Camel Back suitable for wilderness designation. The alternative is the continued, piece-meal erosion of the wilderness qualities there as ever increasing pressures are put on by more and more OHV users, by fuelwood cutters, and other sorts of motorized activities.

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

We also, the Sierra Club also supports the Adobe Badlands for wilderness designation. As with Camel Back, there are no substantial reasons given in the Wilderness Technical Supplement for BLM's non-suitable recommendation. BLM seems not to appreciate the Badlands wilderness, given the fact that the Montrose District did not recommend Mokeena Peak for wilderness, either, when it has the opportunity.

Finally, we urge the BLM to reject the proposed Storm King mountain ski area in this land use plan. The BLM's proposal to place the ski area proposal in administrative limbo, neither outright approving or denying the proposed ski area, is a silly non-decision. The reason for writing the resource management plan in the first place was to provide some guidance to BLM managers for evaluating
back into the country and utilize any of that at all. So I urge the BLM to just continue with it the way that it is.

Thank you.

JOHN MUSHER: John Musser, 704 650 Road, Delta, Colorado. I'm a rancher. My family has been on that ranch for four generations. I think you find most of the families have been on those ranches for two or three or four generations. When you talk about taking away livestock permits, or cutting to 35 percent use, you're talking about taking away a lot of heritage of the area. You're talking about taking away some income that comes into the area both to the BLM in terms of grazing fees and to the economy of the area in general.

I'm saddened that in nearly all of these alternatives it is recommended that livestock use be either cut or curtailed. I recently attended a seminar on holistic resource management along with several of the BLM employees. I'm sorry to say that those that probably should have attended did not.

It appears as though for several years now we have been going the wrong direction. We need to increase livestock use with intensive management rather than decreasing livestock use to get the ground cover that we need in those resource conflicts and to allocate resources based on the analysis of those conflicts.

So the RMP should make a decision about whether Storm King Mountain is better suited for a ski area or for elk calving habitat, and by avoiding making that decision the BLM has kind of missed the point. It seems of the land use planning process in the RMP. So in this case we would encourage the BLM to deny the Storm King ski area on the basis of a lack of demonstrable need for an additional commercial ski area in the area, the lack of demonstrable financial capacity of the proponent, and due to the impacts it would have on the big game herds in the area.

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

Thank you for your attention.

JOHN SINGLAUB: Thank you, Mark.

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

ELEANOR WALDO: I'll wait for the question and answer session.

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

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

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

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

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

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

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

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

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

I will have more written statement, thank you.

JOHN SINGLAUB: Thank you, Jim.

W. W. RULE.
WALTER RULE: My name is Walter Rule, Box 67, Ouray. I'm a member of ORV, which is an Ouray 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 Ouray area and I'm retired there now and I've listened with quite a bit of interest here to the people like the Fores and Musser and others that show a real concern for the land.

The ORV 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 primarily guided by the need of the people who live here and the country as a whole. Timber, minerals, grazing and water:

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 soared 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.

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 begin 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 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 demand for 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.

The potential positive effect on wildlife and water, for the protection that wilderness might give then 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 possess the Camel Back, Adobe Mountains and the wilderness study areas be added to the Gunnison Forest in wilderness classification.

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

JOHN SINCLAIR: Five minutes, Mr. Rule.

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

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

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

In closing I would like to say that I also am a skier and I am opposed to the Storm King ski area development. I think that the elk habitat and the elk calving grounds are much more important to us in the long run than another ski area.

That's all.

JOHN SINGLAE: Thank you.

BILL HARRIS: My name is Bill Harris. I live at

1605 South Mesa in Montrose.

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

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

If the current trend of destruction is not reversed, there will be precious little cultural resources to provide enjoyment to the public and undisturbed sites for scientific investigation in the future.

The Chipeta Chapter of CAS recognizes that the manpower and budgetary constraints placed on the BLM cultural resource managers effectively reduces the quality and the quantity of cultural resource protection. But the ultimate result of this destruction is also unacceptable and unthinkable. Strategies must be developed and implemented that reverse the current destructive trend.

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

BLM called Cultural Resources Series No. 11, it's entitled the survey of vandalism to archeological resources in south-western Colorado by Kickens, Lovelady and Tucker. This particular volume gave a good overview of vandalism and what could possibly be done to stop it.

My second suggestion is to identify high-risk density areas to search out archeological resources in areas that have received little attention. For example, low density areas, places of low profile, benches overlooking major drainages, and areas covered by fluvial deposits.

Emphasis should also be towards protection of undisturbed sites and mitigation of sites that have been disturbed, but have a high potential for recoverable material.

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

The Colorado Archeological Society recognizes the only long term solution to vandalism of cultural resources on public lands is public education, and has recently elevated public education to a committee responsible to a State Board of Directors. This committee, among its other activities, will work closely with Colorado -- will work
closely with the Colorado Office of Archeological and Historic Preservation, and it also looks forward to cooperation between other organizations and other agencies. It looks to that as a high priority.

The Chipeta Chapter of CAS commends the SLH in regard to its recommendation to the RHP draft, preferred alternate, to conduct a Class III inventory of the 5,840 acres.

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

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

Thank you very much.

JOHN SINGLAUS: Thank you.

W. D. WETLAFER: I'm W. D. Wetlauffer, 16574 6450 Road in Montrose, I'm representing myself, my fishing and hunting interest and Western Colorado Congress.

I'm especially interested in the effects to create a wild and scenic river in the Gunnison Gorge. The geological, the environmental, the wildlife and recreational opportunities there are something unusual. For myself that's the thing that's stuck with me when I first came to Colorado from the great State of Texas to make the great State of Colorado even greater. Anything more I can do, I'm here to do it.

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

Thank you very much.

JOHN SINGLAUS: Thank you.

GENE VECCHIA: Can I ask a clarifying question of Mr. Wetlauffer.

W. D. WETLAFER: Yes, sir.

GENE VECCHIA: Are you saying that you are recommending wild and scenic designation, or wilderness designation. I didn't quite get the idea behind your talk.

W. D. WETLAFER: Both.

GENE VECCHIA: Both?

W. D. WETLAFER: Yes, sir.

JOHN SINGLAUS: John Baldus.

JOHN BALDUS: My name is John Baldus, I live at 412 North First Street in Montrose, I am the President of the Uncompahgre Valley Association, which is a Montrose based consumer and conservation group, and Vice President of the Western Colorado Congress, which is a similar group spread across the Western Slope. I'm representing the opinions of a large number of our membership.

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

We are also concerned about the allowances of coal leasing, oil and gas leasing, locatable minerals leasing, mineral materials leasing in the unexcised resource research natural areas, and the areas of critical environmental concern. There's no reason to allow leasing in those 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 crooks that are partially a
result of improper management of grazing allotments.

Concerning the ski area proposal and Storm Kino-
Peak, we rather resent the fact that the ski area was pro-
posed 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 oftentimes 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
biologists should 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 resource management, it
states that road construction, facility development, dredg-
ing 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 dis-
ruption. 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 threaten-
ed or endangered species seems very foolish.

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 detrimen-
tial to wildlife, are you thinking of any particular areas when
you make that remark?

JOHN BALDUS: Well, particularly the most impor-
tant 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
mankind's use.

And I believe that as we sit here this evening
and look at this thing that we can go down the road and
continue to enhance these values, continue to enhance wild
life, continue to enhance grazing and to continue to enhance
their values if we work together and if we're in step with
each other.

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

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

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

I had an opportunity today to talk to a gentleman
who is directly -- well, he borders, his property borders
two wilderness areas in the Upper Gunnison Basin, and he
says some of the most destructive visitors that they will get
on those wilderness areas, which is part of his grazing
permit, are people that come in just to look at the scenery,
to walk around to have a visual experience, maybe to camp,
but they are some of the most destructive, they leave more
trash and more visible disturbance than anybody that they
can put out there.

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

Thank you.

RICHARD GORE: My name is Richard Gore from
Olathe, Colorado, and I am a permittee.

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

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

I'm serious.

Anyway, it is my childhood home, the Roubideau
Canyon and Camel Back area, the Don Love clan. And we have
known of it from the beginning of time, and I don't want to
see it change.

But, here again, I do not think it is wilderness,
has wilderness suitability. It has a quality to it that I
love, but partly because I grew up with it. It has beauty,
it has geology features that are very attractive. But it
also has severities. It has extreme runoff in the spring,
flash flood danger. He has miserable, hot, summer days with
storms. And it can have freezing hail storms in the middle
of June. But this country right now, and as it always has
been, is used for grazing. And in the books it states a
reduction of 35 percent in riparian zones, and it is talking
of a 200 AUM cut in this very area. And in our position as
ranches we can't tolerate that. We didn't feel that the 35
percent has any substantial documentation that would prove
that it would help, and we feel that the 200 AUM is ri-
diculous. Any of you who have walked the creek, walked
the Camel Back area, the Windy Mesa area, I'm sure you have
noticed that there is feed out there and there is feed for
your deer and your wintering elk and the cattle.

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

And I feel that grazing can enhance it.

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

RICHARD GORE: My name is Richard Gore.

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

John Singlaub: Thank you.

Hank Davis: I'll make a written statement.

John Singlaub: Eleanor Walrod.

Eleanor Walrod: I'm waiting for the questions and answer period.

John Singlaub: Okay. To those anyone that did not sign up who would like to speak this evening?

Herschel Bud Burgess: I was late getting here. I would just like to make a few comments on just what was said tonight.

John Singlaub: Would you come up here and state your name and address and who you represent, if anyone, and I'll ask you to sign this when you finish.

Herschel Bud Burgess: All right. I'm known to most as Bud Burgess. My address is 2380 N Road, Eckert, Colorado.

I've listened with interest to a lot of the statements made here tonight, and there's a lot of women with this public land.

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

Most of the damage that has come is from the people, your four-wheel vehicles, and we've got these three-wheel vehicles and now we've got these little four-wheelers and two-wheel bikes. There's where your damage is coming from. I can take you places on the Forest and the BLM and show you where we get a lot of the damage from these little vehicles today.
The gentleman from Texas alluded to the quality of the Gunnison. How many of you remember when you could walk down the Black Canyon and couldn't see the water between the waterholes. How many of you people were in this area at that time.

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

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

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

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

Thank you.

JOHN SINGLAUB: Thank you.

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

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

Thank you.

JOHN SINGLAUB: Thank you.

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

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

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

Do we have other speakers?

Do we have another speaker?

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

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

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

W. W. RULE: No.

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

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

JOHN SINGLAUB: Mr. Harris?

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

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

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

There has been some comments made about off-road vehicles. It is my experience, and I think the experience of a lot of people that are involved with cultural resources management that the use of off-road vehicles has a detrimental affect on cultural resources. Not only on the sites.
GRANT PROJECT OFFICE

A1. The Reclamation withdrawals between the Black Canyon and Coconino Reservoir areas in Sections 7, 8, 9, 10, 11, and 12, T25N, R7W, are not properly marked on the map. These lands were withdrawn for the Apmánevah Project and the Appaloosa storage unit of the uncompleted river storage project (map). The withdrawals in Sections 10, 11, 12, and 13 are for the CDIP and the withdrawals in Sections 4 and 9 are for the Uncompahgre Project.

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

A3. The 40 acres in the NGSA of Section 36, T15S, R6W, should also be shown as withdrawn for the Dallas Creek Project.

A4. On the Fannin Project, lands are withdrawn in the SE1/4NW1/4 of Section 7, T15S, R6W, but are not shown as withdrawn. In the NGSA of Section 7, 15S, R6W, the withdrawal is not properly marked correctly. The tracts identified for disposal in T15S, 15W, Section 32, and T15S, 15W, Sections 3 and 11, are not subject to relinquishment and disposal is not compatible with project purposes.

The NW1/4 of Section 7, T15S, R6W, in questionable as to being public lands. Reclamation acquired an easement from the private owner (Overman, H.R.) in about 1950, and if the land is in fact private, the BLM must be notified. In the land is in public, Reclamation will be required to acquire 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 Canal.

A5. As both the Dominguez and Fruitglove Mesa Projects are being proposed for relinquishment in their entirety, we did not review the disposal or disposal recommendations for parcels withdrawn for these projects.

A6. The withdrawals for the Uncompahgre Project need to be corrected on the map as follows:

The following parcels should be shown as withdrawn:

The NW1/4 of Section 12, T15S, 15W, not shown on the map, should be marked correctly. The parcel is 140 acres and is adjacent to the NW1/4 of the 100 acre tract of the Washakie of Section 12, T15S, 15W, the 13 acres of the SE1/4 of Section 14, T15S, 15W, the 13 acres of the NE1/4 of Section 15, T15S, 15W, the 13 acres of the SE1/4 of Section 14, T15S, 15W, the 13 acres of the NE1/4 of Section 15, T15S, 15W, the 13 acres of the SE1/4 of Section 14, T15S, 15W, and the 13 acres of the NE1/4 of Section 15, T15S, 15W. The land is in the Black Canyon National Monument, which is a federal property.

Certain withdrawals in the NW1/4, SE1/4, and NE1/4 parcels near Coconino Reservoir were inadvertently relinquished without Reclamation retaining a linear withdrawal to facilitate construction of storage facilities. Measures to correct this problem are being worked on at this time. In the interim, any land disposals should retain a linear withdrawal for all structures, canals, diversion dams, large lateral such as
PRELIMINARY ALTERNATIVE

Map "D"

Conclusions 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

D2. Comments same as A2

D3. Comments same as A3

D4. Comments same as A4

D5. Comments same as A5

D6. Comments same as A6

Notes on Uncompahgre Basin

Wilderness Technical Supplement

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

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 waterfowl populations. Secondly, rescue operations are occasionally conducted in the canyon by helicopter.

On page 4-12 f. the minimum flow that Reclamation expects in late April is 300 cfs rather than 200 cfs.

On page 4-13 it is stated that there is approximately 150,000 acre-feet of water available from Blue Mesa Reservoir. The correct figure is 16,000-30,000 acre-feet annually.

Memorandum

TO: Bureau of Land Management, Uncompahgre Basin Resource Area, Montrose, Colorado

FROM: Assistant Director for Engineering Geology

SUBJECT: Review of draft management plan/Environmental statement for the Uncompahgre Basin planning area, Colorado

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

The analysis should indicate criteria to be used in permitting mining and disposal of mineral materials on alluvial floors and flood plains. Mitigation of related impacts should be addressed. The analyses of cumulative impacts would include long-term effects of water use, 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. Permanently impacted areas should be avoided by secondary and/or enhanced recovery methods involving injection and well pressurizing should be included in the analysis.

James E. Devine

Copy to: District Chief, WDA, Lakewood, Colorado
Richard A. Strait

TO:

From:

The number of alternatives (four) and the orderly presentation of material made it convenient to compare impacts of alternatives.

The Preferred Alternative appears to reflect a wilderness value—both on BLM-administered lands and on lands administered by the NPS. We believe the Cunissan 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 OHV-use 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.

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 currently not available, we would like to see how these lands would be designated as potential exchange tracts or have provision for scenic assessment language that would guide the decision on exchange tracts. These BLM-administered lands form an important backdrop to the viewsheds looking north from the monument's south rim.

The four land status maps included with the draft RMP/EIS, after page 43 of the Appendix, need to be revised to show correct WSA 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 considerably portion of Gunnison National Recreation Area that occurs in the Uncompahgre Basin Planning Area. In a good reference for correcting the maps, we recommend the 1985 edition (1985) of the Pennsylvania topographic map.

Thank you for the opportunity to review the generally well-prepared draft RMP/EIS.

Richard A. Strait
OTHER THAN THE FIRE MANAGEMENT ITEM, WE HAVE NOT IDENTIFIED ANY SIGNIFICANT ADDITIONAL CONCERNS. WE APPRECIATE THE OPPORTUNITY FOR THIS REVIEW.

Sincerely,

[Signature]
Forest Supervisor

cc: Regional Forester
Chief (Director, Environmental Coordination)

November 5, 1987

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement

529 23rd Road, Suite B-113

Grand Junction, Colorado 81503

To:

RMP Team Leader, Bureau of Land Management

Uncompahgre Basin Resources Area, Montrose, Colorado

From:

Acting State Supervisor, Fish and Wildlife Enhancement

Fish and Wildlife Service, Grand Junction, Colorado


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, formal consultation should be initiated. Management proposals identified in the plan area, at this time, too 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 resource area rather than 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 hookless cactus are reversed. Based on new locations discovered by Jim Ferguson last field season the habitat description for the Delta lomatium should be expanded to include mid-altitude mancos shale in association with pinyon-Juniper. The wetherilliiii, 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 Uncompahgre Resources Area and the estimated acreage of occurrence is unknown.

Page 2-12, Table 2-7: Endangered, threatened, and candidate animal species.

The river otter, Lutra canadensis ssporae, is a federal candidate species.


We recommend that public wildlife values be considered prior to any disposal of public lands.

Page 2-31. Fish and wildlife.

The Service would appreciate involvement in any variance to seasonal stipulations on lands used by bald eagles for hunting habitat.

Page 3-50. Impacts on riparian zones.

The Service would appreciate involvement prior to the approval of any disturbances to riparian zones.

Page 3-51. Impacts on threatened and endangered species.

The Service would appreciate involvement prior to any mineral resource management that might affect wintering wildlife. Appropriate consultation may be necessary if offroad recreational vehicles use affect the Uinta Basin hookless cactus or if the disposal of public lands affects any threatened or endangered species.

Page 3-52. Impacts on terrestrial wildlife.

The Service would appreciate notification of the potential loss of any raptor nesting habitat.
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.

cc: AOE-Denver
FAC-DLC
Reading File
Official File

DGoberd:811-5-87 (blancom Fraser 5)

Dear Mr. Vecchia:

In accordance with the National Environmental Policy Act (NEPA) and the 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 BLM staff at Montrose in March. 1986. The meeting was followed up by EPA's ongoing concerns for the project which were sent on May 7, 1986. In addition to environmental conditions and effects, our review is also focused on the BMP as a "framework for managing and allocating public land resources" and it's 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 EIS, we have rated this draft EIS as category EC-2 (environmental concerns - insufficient information). A summary of our EIS ratings definitions is enclosed. We commend the inclusion of management units; initiatives on aquatic and riparian monitoring; and the emphasis on salinity, riparian, and aquatic systems. However, the enclosed comments address insufficiencies and recommendations that we feel are appropriate at the BMP level of planning, regarding:

a) the description of consistency with water quality standards (existing/designated beneficial uses) and antidegradation requirements and the Federal/State water quality management programs.

b) 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 indices, for implementing water quality standards (WQS) and/or resource protection under the Clean Water Act (CWA) and Federal Land Policy and Management Act.

We would appreciate the opportunity to discuss with the BLM its proposed responses and NEPA/EIS revisions relating to EPA concerns prior to the final/Environmental Impact Statement (EIS). Based on the review of these documents, such a coordination process would be beneficial in helping address our concerns. Please contact Douglas Fosland of my staff as needed for further EPA coordination at 303-293-1717 or PTS 564-1717.

Sincerely,

Robert R. Ogden, Chief
Environmental Policy Branch
Policy and Management Division

Enclosures

cc: Neil F. Merck, Colorado BLM State Director
David Williams, Office of Planning and Environmental Coordination
NEPA Washington Office
Jim Lemessicht, Colorado Department of Health
Dick Krueger, DHEP, Grand Junction
Laurie Macenave, Colorado Department of Natural Resources
William Dickens, EPA Office of Federal Activities

Robert R. Ogden, Chief
Environmental Policy Branch
Policy and Management Division
I. Agriiculural Resources, Watered Management

Our review of plans for water quality and agricultural resource integrity is based on consistency with:

1. Colorado’s water quality standards (WQS) and water quality management program.
2. Executive Orders (EO) 11752 and 12000 and Clean Water Act (CWA) Act on issues affecting agricultural resources.
3. Requirements for BMPs by the Agricultural Resource Management Act (ARMA).
4. Federal Land Policy and Management Act (FLPMA) requirements.
5. The Clean Water Act (CWA) objectives to achieve and maintain physical, chemical, and biological integrity of Colorado’s waters.


The draft NPDES proposes impacts to aquatic resources from several activities:

1. Locate mineral activities could result in water quality degradation.
2. Fish habitat and native species and sediment in local surface waters.
3. It could result in heavy metal contamination from mine discharge.
4. Sedimentation and wildlife loss in local surface waters.
5. Riparian construction and restoration of nontidal wetlands would increase sediment and salt loads in local surface waters.

III. Riparian Areas and Wetlands

The draft NPDES requires protection for riparian areas and wetlands.

1. Riparian areas and wetlands are defined as those areas where the existing drinking water problems if not impacted.
2. Riparian areas and wetlands should be referred to the Colorado Department of Natural Resources.

Control of soil erosion remains another concern. Of the 94,130 acres with erosion damage, 69,000 acres have either moderate or severe "accelerated erosion" (page 24). Several areas have severe erosion damage (page 25). However, RPM has plans for erosion control projects.

IV. Other Recommendations

- Proposals for the management of riparian areas.
- Forest management activities that could cause increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).
- BMPs management activities that could result in increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).

V. Forest Management

- Forest management activities should cause increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).
- BMPs management activities that could result in increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).

VI. Other Recommendations

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VII. Other Recommendations

- Proposals for the management of riparian areas.
- Forest management activities that could cause increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).
- BMPs management activities that could result in increased sedimentation, bank degradation, and water temperature changes should be reduced (page 4-54).
Consistency of the above management direction with existing policies and executive orders should be documented. We found the draft IMP/ES to lack sufficient criteria and standards for MSG aquatic resource protection (see the CWA and FPMs) to be applied to management of the described activities. Without such criteria and standards, for example, we support the Conservation Alternative which would withdraw riparian zones from mineral entry (page 4-35). Formulation of mitigation measures for impacted development is mentioned on page 3-38. The final IMP/ES should state BLM's mitigation policies, etc., avoidance, restoration, compensation, etc., for riparian/wetland/aquatic resource impacts. It appears that leaving some areas open to OWM use contradicts the Preferred Alternative direction on page 3-9, under which most riparian areas would be improved with at least maintenance of existing conditions for the core.

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 on experience in using grazing management without riparian fencing to achieve adequate improvement and protection of multiple riparian values.

Table 2-5 lists 1,034 acres of riparian vegetation type. Much larger amounts of riparian areas are mentioned nowhere, thus in the largest amount of riparian area?

**Monitoring and Evaluation**

The draft IMP makes several references to monitoring. IMP implementation will be monitored (page 1-11). "Water quality ... would be inventoried and monitored" (page 3-29). The riparian zones would have intensive "aquatic habitat" monitoring (page 3-38). While we concede these planned initiatives, we question the documentation gaps discussed in the comprehensive CWA monitoring program in an appendix or monitoring chapter. The monitoring program needs for this project should include key information like (1) goals and objectives, (2) types of surveys (ambient, intensive) or assessments (what are we trying to measure and how will we be monitored), (3) water quality monitoring and environmental indicators e.g., aquatic habitat, sediment delivery, (4) monitoring methodologies for monitoring implementation and adequacy of best management practices, (5) the person or entity responsible for monitoring, and (6) the person or entity responsible for analyzing the data from activities. Refer to our upcoming letter for other comments. It would provide the basic framework for CWA monitoring (including MSG/financial uses) in the Resource Area. However, there is no assurance that this monitoring would be implemented as described, and public input should be welcome and considered on this framework in the IMP/ES. The IMP direction would then be applied in site-specific monitoring programs under CWA section 319 in order to assess and enhance aquatic habitat, and in a "base line" of potential habitats for the winter home and delta ground via both recreational (IRM) and OSP. We would like to see additional direction/documentation for the IMP side for compliance with endangered species as well as to develop a complete program in a timely manner and update the EMPs.

**From the perspective of wildlife and recreatıon, the Conservation Alternative would best conserve and protect wilderness, wildlife habitat, 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 BLM states that there is some coordination with the State in locating and identifying MSG "water pollutant sources", and that input to the State's biennial water quality assessment under CWA section 319 is made. We would like to see how the IMP/ES implementation plan or一个 recognize action to be taken in response to existing potential impacts under CWA section 319, (b) and (c). We believe the IMP/ES implementation plan should be used to ensure the described water quality management planning program.

**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 higher stream restoration project underway (see the Division report). The agencies should make arrangements continue and enhance this program.

**Protection of the most critical wildlife habitats in the riparian Resource Area, riparian areas and big game winter range, is essential.**
The importance of riparian habitat warrants its careful analysis and management. The number of acres of riparian habitat is not consistently referenced in the EIS. Riparian habitat is shown as 1034 acres (4.68), 2,324 acres (4.51), and 2,324 acres (4.51). It is imperative to analyze potential impacts on an accurate number of riparian acres.

The EIS lists the principal proposed riparian restoration management actions as:
1) Limit forage utilization to 35% on 620 acres (4.51);
2) "Intensive" grazing management on 712 acres (4.51);
3) Removal of grazing from March 1 to May 1 (4.51); and
4) Reduction of livestock allocation by 200 AUM on several grazing allotments each year.

The EIS should describe how each of these measures would contribute to the restoration of riparian areas. For example, how will the reduction of 35% AUM on seven allotments improve riparian areas?

Minerals and Energy Resources

The state has no significant disagreement with the preferred alternative with regard to mineral and energy resource development. The Lake Verde coal in the Paonla area may be exploited in the future. This area appears deserving of designation although the Division of Wildlife is concerned that access for management and recreation purposes be provided. At the same time, the proliferation of roads similar to that which has occurred in nearby areas should be avoided. We would like to see this issue cooperatively worked out to allow eventual designation of the Cawel Back area.

Special Management Areas

The EIS should present information on remnant or relict plant communities in the resource area, including those suitable for special management consideration. Recent data indicate the presence of high-quality riparian vegetation along the Incomparably River (T&H RIMS 32 NE1/4 SE1/4) and in wells in the Paonla area (145 E 26, portions of sections 10, 19, 20, 30, and 145 E R33, portions of sections 26 and 35). The Colorado Natural Areas Program will work with BLM to identify and evaluate appropriate high-quality vegetation sites for special management consideration.

We recommend that each special management area contain information and management provisions on all relevant alternative uses of the sites: (1) grazing; (2) OHV use; (3) camping in public access; (4) mineral exploration; and (5) mineral entry. This is necessary to protect important features of each area. For example, livestock use in the proposed Escalante Canyon has severely degraded the riparian ecosystem (and federal-threatened) populations. Yet no special provisions for grazing are presented.

The BLM should include discussion of the 1986 recommendations of the BLM Geologic Advisory Group. Recommendations included the designation of 700 acres of Chalk Canyon and recognition of the Unit Mountain fault zone within the proposed Gunnison Gorge Recreation Area.

The EIS should indicate the proposed change in status for Needle Rock from a BLM Research Area to an Outstanding Natural Area as supported by the advisory group.

Wilderness

We support the recommendation in the plan of 21,036 acres of Gunnison Gorge for wilderness designation. This land is a geological continuation of the Black Canyon of the Gunnison containing spectacular waterfalls and offering outstanding fishing, hiking, and river boating challenges.

The Cawel Back wilderness study area also has outstanding wilderness attributes. Its colorful deep canyons and mesas create vast panoramic vistas and extensive recreational opportunities. As the EIS states, mineral development in the area is unlikely over either the short or long term. This area appears deserving of designation although the Division of Wildlife is concerned that access for management and recreation purposes be provided. At the same time, the proliferation of roads similar to that which has occurred in nearby areas should be avoided. We would like to see this issue cooperatively worked out to allow eventual designation of the Cawel Back area.

Water

Any impact of coal management, locatable minerals management or oil and gas management which would injure an adjudicated water right, will have to be mitigated by a plan for augmentation approved in court prior to the occurrence of the injury.

Rules requiring casing of all oil and gas wells and mineral test holes would help alleviate aquifer mixing and ground water degradation. Plugging and abandonment of test holes are governed by the Colorado Mineral Land Peace Act and the regulations.

Threatened and Endangered Species

Andesitic volcanic populations, populations of Federally threatened or endangered plants species should not be released from federal ownership. Populations of clay-loving wild buckwheat have been documented at both disposal tracts mentioned specifically on page 6.52. Descriptions of additional disposal tracts (2,800 acres) should be made available for review.

Potential habitat for endangered plant species should be surveyed before oil and gas or mineral resource development occurs and avoidance stipulations applied to known populations. Threatened or endangered species in livestock or OHV areas should also be monitored to assess grazing impacts and loss due to OHV use or collecting. In particular, the document should discuss how development of the North Delta OHV use area will impact critical habitat for the Unita Basin buckwheat, potential habitat of cliff-loving wild buckwheat, and the Delta Island Management.

Management practices should be implemented which enhance habitats for special interest species which have been historically impacted by agricultural development in the Unita Basin area, such as sage grouse. The Division of Wildlife will assist in identifying such management practices.

We appreciate the opportunity to review your draft management plan and look forward to continued cooperation with BLM as dockets implementing these plans are made.

Sincerely,
DENIS M. ORLANDO
Acting Executive Director

ENDNOTES: 7353

cc: State Agency Reviewers
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 WIS 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 the WIS project and water projects will have a dramatic adverse economic effect.

Very truly yours,

City of Delta

JMK/r1

Mr. Robert Vecchia
RMP Team Leader
Uncompahgre Basin Resource Area
2605 South Townsend Avenue
Montrose, Colorado 81401
I do feel that the BLM needs to reconsider their recommendations that the Camel Back and Adobe Badlands be a wilderness area. I feel that the BLM has not taken into account the potential for mining and development in these areas. According to BLM's reports, there are absolutely no resources that would justify these areas as wilderness. I believe that these areas are not suited for wilderness designation and should be designated as a scenic area instead.

Thank you,
John Bradley
Internship Southwest Office
资源保存和销售，为正常费用。

4. 发展一个可以展示给游客、地方公民团体和学校的考古学主题的展示。

5. 积极推进受损考古遗址的修复。

6. 涉及对历史和文化遗产感兴趣的本地团体的实施以上建议。

7. 巡逻高密度遗址区域并监测遗址状态。

8. 限制越野车在高密度遗址区域内使用，关闭不必要的越野车道。

结论：我想强调的是，BLM有及时管理民族文化问题的机会。您的决定将决定未来几代的命运，并希望能够保存和保护Uncompahgre盆地的独特文化资源。

我代表Chipeta章的科罗拉多考古学会，并在9月29日Montrose举行的BLM草案资源管理计划听证会上进行了口头评论。我不会重复我那天所说的，但我想对几个关键点做个补充。

1. 强烈建议BLM在Adobe Badlands进行综合考古调查。

2. 出版一本描述Uncompahgre盆地的文书遗产的指南。这本指南应该易于阅读，清楚地插图。包括彩色和黑白照片。

3. 对BLM在Uncompahgre盆地的管理计划感兴趣。这本指南应该在Montrose、Uncompahgre盆地历史协会和其他高影响设施中展出。

4. 发展一个可以展示给游客、地方公民团体和学校的考古学主题的展示。

5. 积极推进受损考古遗址的修复。

6. 涉及对历史和文化遗产感兴趣的本地团体的实施以上建议。

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8. 限制越野车在高密度遗址区域内使用，关闭不必要的越野车道。

总的来说，我认为这个计划是模糊的，它没有真正量化影响。这个计划使用了如“显著”，“可能改进”等主观术语，而不是量化的影响。我们希望有一个实际的数字，让公众能更好地理解影响。

煤炭开采计划中最具破坏性的是煤炭开采的区域。83,396英亩被列为煤炭开采区，但根据环境影响声明，这个区域的开采可减少到20,737英亩。这是因为当前管理计划更支持更好的保护环境质量的North Fork Valley。

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under the unsuitability criteria, and explain the methodology used for determining unsuitability. This is one of the few BMPs 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 of Consideration criteria is the location of the Adobe Badlands WSA. This badlands area is obviously one of the most scenic areas in the Uncompahgre Resource Area. A rereview of the unsuitability criteria obviously needed to occur in the final EIS.

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 BMP-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 producable coal reserves. An example of a BMP Resource Management Plan that did examine multiple-use trade-offs is the North Dakota BMP and EIS. We recommend that you take a close look at this document when preparing the final EIS.

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 superceded by anything in the 1984 Supplement to the EIS, it is still in effect. We maintain that the BMP must address intrazone particularly for wildlife and socioeconomic capabilities of the surrounding area.

The Secretarial Issue Document of 1986 requires that the BMP assess the coal development potential of the area. The reason that this should be covered in the BMP is so leasing levels can be in line with demand levels. The Uncompahgre Basin BMP states on page 4-44 that "The possible leasing of up to 5,730 million tons of coal would far exceed demand over the life of the coal plant" and that any coal project from Delta and Gunnison counties was 2.4 million tons and optimistic annual coal production forecast for this area range from 4.5 to 7.35 million tons for the years 1990 to 2000. The plan assumes on page 4-44 in state that "this [preferred] alternative is not anticipated to impact coal production planning of this plan." The Plan blatantly ignores the realistic coal development potential of the area.

The Secretarial Issue Document (1986) also requires the BMP to give "increased emphasis" to six criteria that other agencies, the OPA, and public insisted to be included in the unsuitability criteria. Among these other criteria are effects coal mining will have on Class I water sources, aquifers, lands adjacent to Class I air quality areas, and the Black Canyon of the Gunnison National Monument's Wilderness Area. The plan continues on page 4-45 that "The possible leasing of up to 5,730 million tons of coal would far exceed demand over the life of the coal plant." The plan assumes on page 4-44 that "this alternative is not anticipated to impact coal production planning of this plan." The Plan blatantly ignores the realistic coal development potential of the area.

We oppose the ski area proposed for Storm King Mountain under the D-10 management prescription. The D-10 area should be managed for elk habitat and wildlife habitat should be slated for retention. Storm King is not only fantastic elk habitat, it is also on an important scenic corridor, the upper Uncompahgre Valley. The natural character of the area should also be maintained for this reason.

We have serious concerns for the resource uses which would be permitted in the D-12 and D-13 management prescriptions. The D-10 area should be managed for elk habitat and wildlife habitat should be slated for retention. Storm King is not only fantastic elk habitat, it is also on an important scenic corridor, the upper Uncompahgre Valley. The natural character of the area should also be maintained for this reason.

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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 Uinta Basin hookless cactus. Since four oil and gas wells have been drilled near Adobe Badlands and all have gone dry, the area also has low oil and gas development potential. Unless controlled with wilderness designation, oil and gas will continue to be allowed in BLM states in the plan that it intends to prohibit off road vehicle use 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.

Camelback

Camelback has absolutely no conflicts with 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 Camelback is almost identical to Camelback, we have found the areas to be quite different. Camelback has a much greater diversity of rock formations that are not present in Dominguez canyon, making the areas look much different. Camelback contains habitat for the endangered spineless hedgehog cactus and the rare Grand Junction milkvetch. The area is being considered for designation and for the improvement of its riparian habitat in this plan. Both of these activities would be consistent with wilderness designation. Camelback 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 Camelback and should support the area for Wilderness designation.

Walk Off Road Vehicle (ORV) use in the plan. The prospect of having 92% of the resource area open to uncontrolled ORV use is frightening. We support extending the regional ORV use prescription (geared to ORV use, being located in habitat for the endangered Uinta 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.

We would like to offer the following comments on the Draft Uncompahgre Basin Resource Management Plan (RMP) and Environmental Impact Statement (EIS). RHOGA is a trade association with hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Importantly, we review all draft plans in the area 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 plan. We support the plan as proposed represents a balanced approach to land management planning which adheres to the multiple-use concept mental by Bureau policy. However, the BLM's decision are needlessly displayed and are easily understood by the reader. The use of oil and gas activities are conducted on public lands. Specifically, the procedures and regulations which the BLM must comply with regarding leasing, exploration and production activities should be generically discussed in the document itself, or in an appendix. Such discussion informed the public on how oil and gas activities are allowed to occur on public lands, and the process by which such activities are mitigated and approved.

October 29, 1987

Mr. Robert Vecchle
RMP Team Leader
Uncompahgre Basin Resource Area
2522 South Townsend Avenue
Delta, CO 81416

Dear Mr. Vecchle:

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In conclusion, RHOGA supports the Preferred Alternative as proposed by the BLM. However, we believe it is critical for the BLM to adopt our recommendation to include a general discussion of what takes place during oil and gas 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,

[Signature]

Executive Vice President

October 29, 1987

Mr. Robert Vecchle
RMP Team Leader
Uncompahgre Basin Resource Area
2522 South Townsend Avenue
Delta, CO 81416

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Uncompahgre Basin Resource Area
2522 South Townsend Avenue
Delta, CO 81416

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[Signature]

Executive Vice President

October 29, 1987

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RMP Team Leader
Uncompahgre Basin Resource Area
2522 South Townsend Avenue
Delta, CO 81416

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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,

[Signature]

Executive Vice President

October 29, 1987

Mr. Robert Vecchle
RMP Team Leader
Uncompahgre Basin Resource Area
2522 South Townsend Avenue
Delta, CO 81416
Robert E. Vecchia

MINERALS EXPLORATION

COUNCIL

Executive Director
P.O. Box 1210
255 South Townsend Avenue
Montrose, Colorado 81401
(970) 249-4840

Dear Mr. Vecchia:

The following comments constitute the response of the Minerals Exploration Council (MEC) to the Uncompahgre Basin Resource Management Plan (UBRMP) 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 minerals 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 present mineral use, the acquisition 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 2-3 and 2-4, a way showing location and extent of these areas was not prepared. No tally of the mineral potential is shown for areas outside the U.S.A. and within the U.S.A., maps showing the location of the areas rated is lacking.

The absence of mineral data is particularly evident when one considers the economic data shown in Table 1 in Appendix I. The table shows, except for copper, mining provide less than 1% of personal income to the citizens of the region. Detailed information for some resources is included in the appendix but for minerals how can the largest source of non-government income be omitted?

The Minerals Exploration Council opposes the inclusion of areas of high potential for locatable minerals 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 exclude moderate to high potential should be changed to exclude the mineralized areas or the U.S.A. should not be recommended for wilderness designation.

Robert E. Vecchia

RFP Team Leader

Audubon Society

of Western Colorado

Dear Sir:

The Audubon Society of Western Colorado appreciates the opportunity to comment on the Uncompahgre Basin RFP and DEIS. 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 decisions which incorporate elements of the conservation alternative into the preferred alternative.

2. The conservation alternative recommends a wilderness designation for the Adobe Badlands area and for the Came Back area. We strongly support this recommendation. We believe this omission is a mistake. We support any action which will enhance the preservation of wilderness values, as this designation is a short-term and negligible in comparison.

3. If the Came Back area is not to be designated as wilderness, off-road vehicle use in the area should be prohibited. The DEIS states that ORV use would be "limited to the primary corridor" and "established in 2045." However, the preferred alternative does not allow such use in the Came Back area. We recommend the Came Back area be designated as wilderness.

The preferred alternative also aims to "minimize disturbance" in this area to enhance habitat for brown bears, allowing ORV use would certainly hamper this goal. Further, the preferred alternative provides for wilderness buffer management, it fails to allocate forage for these animals. This failure could easily lead to the foraging of the re-introduction.

4. The preferred alternative for the Came Back area is confusing. The map for this alternative means to label the area "D-1," which "would be managed to improve vegetation conditions and forage availability for livestock grazing." The description of Management Unit D-1, under the sub-heading "Soils and Water Resources," states that "undesirables," such as control objectives, projects and mitigating measures would be incorporated. We believe the "Comparison of Alternatives" chart, however, states that the plan is to "manage the Came Back area with emphasis on today's available system management, rainfall, habitat and livestock grazing." We hope that the real priority is that described in this chart (i.e., wilderness designation) is not distorted. 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 time to use soil erosion control as the primary objective. Wilderness designation for the Badlands area is needed.

6. The Wilderness Technical Supplement states that "the proposed Action is based on 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 RFP. It is impossible for the public to provide adequate input on RFP decisions when these decisions are unknown. An analysis of the alternatives, such as that provided in the DEIS, R.B. If this would be most helpful. Because the Uncompahgre Basin plan contains no such analysis, it seems reasonable to request an absentee that includes this information and time for the public to respond to it.
Sierra Club
Rocky Mountain Chapter

Robert E. Vecchia
Bureau of Land Management
Uncompahgre Resource Area
2505 S. Teasdale Ave.
Montrose, CO 81401
Nov. 13, 1987

Dear Sir:

The following comments on water quality/soils riparian aspects of the Uncompahgre EIS and RMP were made on behalf of the Rocky Mountain Chapter. This draft document correctly identifies that parts of 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 almost half of the disturbed 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 credible and correct, although the discussion of the impacts in the text is too strong overall. Impacts that are especially important to us are: permitted grazing on 68,000 acres of highly saline and valuable soils during the spring season, year-long ORV use.

Provided that reasonable measures are taken by the BLM to protect soils and riparian zones in its gaming and ORV management programs, the Rocky Mountain Chapter would like to express its willingness to explore voluntary stream restoration projects with the RMA staff, as we have done in other areas.

Thank you for your consideration of these opinions.

Sincerely,

Kirk Cunningham
Conservation Chairman

2239 E. Colfax Avenue, Denver, CO 80206
303/321-8292

November 1, 1987

ROBERT E. VECCIA, BLM TEAM LEADER
Bureau of Land Management
Uncompahgre Basin Resource Area
2505 South Townsend Avenue
Montrose, CO 81401

FROM: Delta County Livestock Association
John Bott, President
P.O. Box 24
Crawford, CO 81415

SUBJECT: Uncompahgre Basin Resource Management Plan - Contents

The Delta County Livestock Association is in agreement that the EIS/CIS is an excellent document and that the recommendations are sound. However, we would like to suggest some additional points which we feel are necessary to ensure the success of the management plan.

1. The 10,002 acre Cimarron Basin area should continue as a non-multiple use area. The area does not have the suitability for a multiple use designation. The management plan now implemented is working well and the organization has already increased the area along the Cimarron River and Poner Creeks.

4. For several months each year, these streams are dry. Damage by fish flooding and stream flow into stream beds, not grazing by livestock, because of the terrain, this area is subject to several fish floods each year.

Introducing big horn sheep into the area would only compete with the deer and elk in the winter range. Private lands would be over run by these animals needing forage in the winter.

The 600 ACRE allotment for livestock grazing should remain unchanged.

Neither the Joe Blaine nor the Bill Brandi Ranch should be utilized under multiple use. Both were utilized as riparian areas. The 300 ACRE allotment for livestock grazing should remain within the Public Land Office.

The Cimarron Basin should be utilized under multiple use. Proper management increases riparian habitat.

The 600 ACRE allotment for livestock grazing should remain unchanged.
Sierra Club Comments  
November 3, 1987 

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It's unsuitable representation for Casmal Ranch HWA, 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 DWU use. On the other hand, there is an impressive array of quality values present in the HWA, as BLM itself has noted. These include critical big game habitat for threatened and endangered species such as golden and bald eagles as well as rare plants and wildlife associations. As the Pikes Peak Plateau Historic Site, stunning scenery, and uncommon geologic features such as hoodoos. BLM has, in short, fully met all of the wilderness requirements for a wilderness area. All of these, coupled with the excellent manageability of the area due to its compact topographic boundaries, indicate that BLM should recommend approval of the proposal on its own merits. One particularly unique aspect of Casmal Back is its position as an integral part of the longest intact roadless drainage on the entire Uncompahgre Plateau. The 7 or 8 miles of Rodhouse Creek within the HWA, when combined with the 15 miles of undeveloped canyon on the adjacent uplands National Forest, make this drainage the only continuous, roadless drainage that comprises the full range of ecosystems present on the Uncompahgre Plateau, from the alpine spruce forests of the divide to the special ecological value of the uplands above the lower canyon. How does BLM consider the value of a unit such as Casmal Back which is unique in its contribution to protecting an entire ecosystem? Surely, ecosystem protection is one of the greatest priorities of the National Wilderness Preservation System. BLM Back is surely in providing such a distinctive opportunity on a site where the unique character of the area is unaltered by any other unit of wilderness existing in the region. Has BLM taken the non-wilderness designation of the Rodhouse HWA area to mean that Casmal Back needs not be designated as wilderness? Has BLM taken the non-wilderness designation of the Rodhouse HWA area to mean that Casmal Back needs not be designated as wilderness?

The Sierra Club strongly endorses the BLM's preferred alternative 61 recommending all of Sunnison stepping over the issue of finding additional water sources for 52 wilderness designation. The potential to significantly enhance BLM's previous 66 recommendation of the Sunnison River through the HWA for Wild and Scenic National Monument would be wasted if BLM's management 64 proposal we are that the river as Wild and Scenic and the HWA as wilderness.

Sierra Club Comments  
November 3, 1987 

Page 4

STORM KING PEAK SKI ARE AL SITE  

The RMP/DEIS completely ignores the impact of the proposed storm King PEAK SKI ARE 69 AL site on the wilderness. Despite the apparent desire of the RMP/DEIS 60 for access, the proposed ski area has been identified as a non-wilderness site. 61 The proposal is based on a land clearing project that would result in a 62 development area, and is therefore not considered a wilderness site. 63 The proposed ski area is located on a ridge in the Storm King Mountains, 64 and would involve clearing a large area of forested land. 65 The impact of this 66 development would be significant, as it would result in the loss of a valuable 67 wildlife habitat. 68 The RMP/DEIS does not consider the long-term effects of this 69 development, and therefore does not take into account the potential 70 impacts of the proposed ski area on the surrounding wilderness. 71

Sierra Club Comments  
November 3, 1987 

Page 4

We would also submit that if BLM insists on accommodating this phantom ski area under the assumption that such development might not be needed (24-34), that seems a more realistic way to proceed.

On one final note, the RMP/DEIS has a significant oversight in failing to include in the Preferred Alternative a wilderness component of "Wildlife Habitat and Recreation Management" (4-32) any mention of the impacts to ski and eule deer from development of the proposed Storm King Peak ski area.

DESTRUCTION

We commend BLM for incorporating the excellent work that has already been done in developing a comprehensive management plan for the Storm King Management Area into the proposed RMP (3-34). However, what is the 34-41 BLM's apparent rationale for not including this management plan in the proposed RMP? Why is it not appropriate to include these low mineral potential, still exists the possibility for future snow development to occur that would have an adverse
The Sierra Club supports BLM's recognition of the growing demand for
riparian habitat and recreational opportunities. It is located on a
county road that provides access to the Mc. Donough wilderness, and
it provides for public camping areas in a valley that is almost
entirely otherwise controlled by private interests. We do not use any
riparian areas under which this tract should be paid out of public
ownership.

Two other tracts include the former Baldy Peak MWA (1.44M.
acres), section 3 and a tract along West Dallas Creek (1.44M.
acres, sections 9 and 10). Each of these should only be disposed of if passed on to the
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 and one of the most scenic and popular
locations in the Mc. Donough Mountains.

The Sierra Club supports BLM's recognition of the importance of
riparian zones through its development of the "D-V" management
prescription in the preferred alternative.

We appreciate the opportunity to comment on the proposed NPS and
DEIS, and look forward to your consideration of these comments.

Sincerely,

Mark Pearson
Chair, Rocky Mountain Chapter, Sierra Club
P.O. Box 380
Grand Junction, CO 81502

Mr. Vecchia
December 1, 1987

The final NPS must be changed to omit the proposed North Delta ORV use area,
development of which will destroy many such plants.

The impact of ORV use on Passiac shelves is undeniable; such use must be
prohibited, not merely restricted, in additional areas. Closure of only A of
the Resource Area to ORV use (unspecified) is insufficient. Additional resources
should be provided not only plant resources, but would reduce the adverse impacts that
the proposal levels of ORV use actually will have on air quality (page 4-
68), soils (4-18), water resources (4-50), riparian zones (4-50), T and E
species (4-51), wildlife habitats (negative impacts of open ORV use noted
listed, p. 4-52 and 4-53), livestock grazing (4-54), cultural resources
(4-57), and visual resources (4-58).

The limited but highly significant riparian vegetation of the Resource Area
active land could not be accomplished in the NPS. NPS. The listed plants should
be more closely identified this important habitat, and spell out management tools that
will be employed to restore and maintain it. The very small acreage
involved (inconsistently described as 1.036 acres (Table 2-1), page 3-8,
6.320 acres (page 4-54), 11.455 acres (6.320 x 1.8, plus 4-113) and the
importance of this component of the ecosystem warrant total exclusion of
grazing, seasonal limitations, partial NPS reductions, or forage
utilization limits on grazing are not sufficient for restoration or
continued existence of quality riparian areas.

We support designation of the Escalante Canyon AEC, the Fairview EMA, and
the Needle Rock AEC/RWA, but management plans for these areas are not
specified to sufficient detail. Management Unit D-12, the Escalante Canyon
AEC, should be altered to encompass additional lands along Escalante
Creek. This area requires restrictions on livestock grazing to prevent damage to
the federally listed and other unique botanical resources. Other
management provisions should be listed in specific detail for each
site.

In addition to our support of recommendation of the Casimino Corse WDA, we
also ask that Adobe Ballena and Game Ranch be recommended as suitable
for wilderness designation. We find absolutely no justification in the draft NPS for exclusion of the latter two areas. The NPS 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 4-58); why, then,
are these "existing wilderness values" not to be recommended for
wilderness protection? Please reconsider, and secure both Adobe Ballena
and Game Ranch as recommended for wilderness status.

We also ask that the statement of intent to acquire resources to protect
threatened and endangered species in land use activity plans (page 2-7) be
amplified to clarify that intent also includes BLU-sensitive and state-
endangered plant species and plant associations.
Finally, we strenuously oppose disposal of any public lands on which federally listed or candidate plant species occur (page 4-12). The final EIS 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 otherwise mineable public properties...

Thank you for the opportunity to review and comment on the draft RMP. We would be glad to cooperate in any possible way to perpetuate the unique biological values of the Gunnison Creek area, which we consider a very special part of Colorado.

Sincerely yours,

Susan S. Martin
Conservation Committee Chair

The Federal Land Policy and Management Act (FLPMA) requires BLM to "give priority to the designation of Areas of Critical Environmental Concern." FLPMA defines ACEC 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 ACEC in the Uncompahgre Resource Management Plan. While the Conservation Alternative and Preferred Alternative recommend designation of ACEC, the Plan fails to provide any analysis of other potential ACEC candidate areas. This failure leaves NCPA 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 same weeks 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 summary, BLM stated, "A 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.

We encourage the BLM to revise its criteria for identification of disposal lands to rule out high recreation value or use area. Similarly, lands with wilderness values, historic values, cultural resources or values wildlife resources or values should not be identified for disposal.

We strongly support BLM's recommendation to recommend all 21,099 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 document provides no compelling reasons why this area should not be recommended for wilderness designation. Resource conflicts appear to be minor, especially since BLM states in the plan that it intends to prohibit off road vehicle use in this 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 Caneel Bank WSA for wilderness designation. Caneel Bank is one of a limited number of undisturbed areas still existing on the Uncompahgre 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 Caneel Bank.

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.

In order to adequately protect public land resources and meet its stewardship responsibility, BLM should limit vehicles to existing roads. Except in limited "urban" and "rural" areas, areas open to off-road vehicle travel are clearly sacrificial areas. Vegetation, soils, wildlife habitat, and scenic values are 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
Rocky Mountain Regional Representative
National Parks and Conservation Association
PO Box 1063, Salt Lake City, Utah 84110
801-532-4796
Putting People and Rivers Together

Date: 12/15/77

Robert H. Vecchia
MO Team Leader - NRM
2205 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (do not) agree with the BLM's proposed action, the All Wilderness Alternative, for the Uncompahgre Basin Wilderness Study Area.

The Cimarron Back and Adobe Trails 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.

Sincerely,

[Signature]

Robert H. Vecchia
MO Team Leader - NRM
2205 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 least detrimental to livestock grazing, is the 'Division of Current Management.'

Under this policy, through Allotment Management Plans, one objectives is 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 set on a site-specific basis.

[Signature]

Box 168 • Ouray, Colorado 81427 • (303) 254-6940

Putting People and Rivers Together

Box 168 • Ouray, Colorado 81427 • (303) 254-6940
COLORADO WESTMORELAND INC.

P.O. Box 1299, Paonia, Colorado 81428  ▬  303-527-4136

November 7, 1987

Mr. Robert G. Vecchia

Manager, Land Management
Westmoreland Resources Area
2500 South Downing Avenue
Denver, Colorado 80210

Mr. Vecchia,

I am pleased to forward the following comments on the coal lease related to our 80 acres in Eagle County, Colorado.

COLORADO WESTMORELAND INC.

Richard C. Wolf

Environmental Specialist

The draft environment impact statement was developed in conformance with the requirements of the National Environmental Policy Act of 1969 (NEPA) and the Department of the Interior's General Notice of NEPA. The draft document was prepared to meet the requirements of the NEPA regulations and to provide the public with an opportunity to comment on the proposed project. The draft document was submitted to the US Bureau of Land Management for review and comment. The draft document is intended to provide the public with an opportunity to comment on the proposed project. The draft document is a preliminary document and is not intended to be a final document.

The following are some of our comments on the draft environment impact statement (DEIS):

1. The draft DEIS is not clear on the potential impacts of the proposed project. The DEIS should be revised to provide a more detailed analysis of the potential impacts of the proposed project.

2. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local community, including the potential impacts on local infrastructure, housing, and transportation.

3. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local environment, including the potential impacts on local water quality, air quality, and soil quality.

4. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local economy, including the potential impacts on local businesses and the local job market.

5. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local culture, including the potential impacts on local traditions and cultural practices.

6. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local health, including the potential impacts on local public health and the potential impacts on local mental health.

7. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local safety, including the potential impacts on local public safety and the potential impacts on local transportation safety.

8. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local education, including the potential impacts on local schools and the potential impacts on local students.

9. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local government, including the potential impacts on local government agencies and the potential impacts on local government officials.

10. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local tourism, including the potential impacts on local tourism businesses and the potential impacts on local tourists.

11. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local recreation, including the potential impacts on local recreational areas and the potential impacts on local recreational activities.

12. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local wildlife, including the potential impacts on local wildlife populations and the potential impacts on local wildlife habitats.

13. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local energy, including the potential impacts on local energy resources and the potential impacts on local energy consumption.

14. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local water, including the potential impacts on local water resources and the potential impacts on local water quality.

15. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local climate, including the potential impacts on local climate change and the potential impacts on local weather patterns.

16. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local society, including the potential impacts on local social institutions and the potential impacts on local social norms.

17. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local economy, including the potential impacts on local economic growth and the potential impacts on local economic development.

18. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local culture, including the potential impacts on local cultural practices and the potential impacts on local cultural traditions.

19. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local society, including the potential impacts on local social institutions and the potential impacts on local social norms.

20. The draft DEIS should include a more detailed analysis of the potential impacts of the proposed project on the local environment, including the potential impacts on local water quality, air quality, and soil quality.

I look forward to hearing your comments on these issues.

Sincerely,

Richard C. Wolf

Environmental Specialist
In order for the ranchers in the area to be efficient, livestock need to move at least a day's travel through this area. If cattle are not efficient, they will be sold for meat other than ranging. This will not then be available to the wildlife, and the increased use of this area for permanent hauling will cause further deterioration of the environment. In this case, wildlife is in very close proximity to the irrigated ranches not only for food, but for the quality of life that is necessary to sustain wildlife.

The management of each allotment should be considered on an individual basis. For example, the current Harvest Alternative does not have the same qualities of problem areas that exist above 7000 feet in some of the areas that occur below 5000 feet elevation in other areas.

If conflicts are forced on a specific time period and the fifty, many of these will be forced out of their liveliveness operations. While this is not exactly what many of the world's environmentalists are putting for, if the livestock operators are forced out of the range area, there will be liberation of the range area for wildlife because livestock is an important and reliable prey for the ecosystems. Contrary to popular opinion, 80% of the wildlife in the deeper valleys, outside of the fallow areas, is dependent upon private lands. Our public lands have a vital supply of water, fish, and potential wildlife habitat and populations.

The increased flexibility of water quality, as recently signed the DRAFT MANAGEMENT PLAN FOR THE GUNNISON RIVER WATER BOWLS WITH emphasis on cooperation and understanding between the affected parties and for the areas of concern are air quality, grazing, wildlife, habitat, or mining etc. Thank you for the opportunity to reply to the DRAFT EIS/FEIS.

Sincerely,

[Signature]

Mr. Vecchia

Mr. Vecchia -2- November 4, 1987

The WSC also unequivocally describes the benefits and alternatives to Colorado-Ute's project. A reservoir constructed on the Gunnison River would provide Colorado-Ute benefits in addition to the geographic area. Colorado-Ute's project may be replaced by constructing coal-fired generation, as suggested on page 4-31 of the WTS. The concept of 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 potential designation of a Black Canyon National Park and Scenic Recreation Area that the loss of this area would result in the Gunnison River water right owners by Colorado-Ute and the city of Delta, and Colorado-Ute's associated power, should be mitigated. The proposed Uncompahgre 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 that the Gunnison Gorge designation would have on areas that are currently stressing or would stress wildlife in the area. Gates or barriers can be used to restrict access, will be compensated for the water right development potential that would be lost as a result of wilderness designation.

Management Unit D-7

Colorado-Ute disagrees with the proposed management of major utilities in management unit D-7. A large geographic area (105,964 acres) is proposed to be closed to utility development to reduce conflicts between utilities and potential surface effects of coal mine subsidence. Colorado-Ute feels this is unnecessary since the existing mines in the area are open and piling operations have not caused serious problems. If a transmission line were needed in this management unit, any potential subsidence problems could be addressed in the BLM permitting process. 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 line 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 now 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 vs restrictions on lands not identified as corridor or corridor trial. If utility facilities would be assumed to have a negligible impact on local and regional utility development. The need for and predictibility 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. 4-59). In 1980 Western Regional Corridor Study) for utility facilities would be assumed to have a negligible impact on local and regional utility development. The need for and predictibility 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. 4-59). In 1980 Western Regional Corridor Study) for utility facilities would be assumed to have a negligible impact on local and regional utility development. The need for and predictibility 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. 4-59). In 1980 Western Regional Corridor Study) for utility facilities would be assumed to have a negligible impact on local and regional utility development. The need for and predictibility of utility development is much more dynamic than has been portrayed.

Thank you for this opportunity to comment on the Draft Uncompahgre Basin Resource Management Plan. Please contact me if you have questions concerning these comments.

Very truly yours,

Gary A. Walker, Manager

Environmental Services

November 4, 1987

Mr. Vecchia

November 4, 1987
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 ten days and was not able to get through due to your phone number having been changed. On October 24, 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. Unites 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 5, "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,

[Signature]

LFMcj
Dear Gene,
I wish to go on record as opposing wilderness status for all or even any study by the BLM. I understand the BLM has been studying the Rhinerion Range for wilderness status. I am not happy about that.
I fail to understand why we do not preserve so much as we can of the remaining wild parts of our public lands. These have been developed in one way or another too much. Now is a time we should make a decision. So do I wish it to be an enlightened decision and wise.
I wish you would not try to build a wilderness area on a mountain top or on remote parts of the country. This would be a mistake in my opinion.

Sincerely,

[Signature]

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Should take a position of preserving all it can for the sake of future generations.

We all need more of the natural world in our lives.

The future is uncertain.

We should do all we can to preserve what we have.

[Signature]

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We care about wilderness.

[Signature]

---

As a native son born in-trust we have a stake in the future.

[Signature]

---

We must act now.

[Signature]

---

Again, let us not forget.

[Signature]

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[Signature]
Dear Mr. Vecchia:

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 Badlands 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 minerals or other extractable resources. Camel Back and Adobe Badlands 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 Badlands for wilderness protection, in order to preserve these valuable regions.

Sincerely,

[Signature]

[Address]

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

54959 Hickory Road
Castle, Colorado 81425

September 18, 1987

To: Robert E. Vecchia
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.


We have reviewed the June, 1987 Declaratory Resource Management Plan draft 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 RMP 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:

Sec. 14 NW 1/4 NW 1/4

Sec. 16 SW 1/4 SW 1/4

Sec. 18 SE 1/4

TOTALS - 160 Acres

Lands selected by the Brown family:

Sec. 18 NW 1/4

Sec. 16 SW 1/4

Sec. 14 SE 1/4

TOTALS - 200 Acres

Lands offered by Victor and Rex Reed:

Sec. 20 SW 1/4

Sec. 19 SW 1/4

Sec. 18 SE 1/4

TOTALS - 160 Acres

Kurt Johnson
747 12th St.
Boulder, CO 80302
The advantages of this proposed land exchange are as follows:

1. "The management unit would be designed to improve vegetation conditions and increase availability for livestock grazing." (Chapter 3, Page 37, U.S.D.)

2. "It is anticipated that existing federal lands that would improve livestock management and increase usable range land would be acquired through exchange only." (Chapter 2, Page 24, U.S.D.)

3. "Identification of public lands that are suitable for disposal and public lands that would 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, U.S.D.)

4. "The BLM actively acquired large tracts of federal land in the western U.S. to be used for recreation and timber production. In addition, the BLM would acquire a significant amount of land in the area for public use." (Chapter 6, Page 68, U.S.D.)

5. "Rural areas will contain land in blocks for more efficient management." (Chapter 6, Page 68, U.S.D.)

6. "Private inholdings would be acquired." (Chapter 6, Page 68, U.S.D.)

7. "The BLM would acquire one-fourth of the acreage as a buffer area between the new BLM lands and private lands." (Chapter 6, Page 68, U.S.D.)

8. "Abandoned rights held on private lands by Brown and Read would be conveyed." (Chapter 6, Page 68, U.S.D.)

Conclusion: For the above reasons we believe the proposed land exchange would be in the public interest.

Respectfully submitted,

[Signature]

[Name]

The card was created for use by World Wildlife Fund members and others who want to keep wildlife. The money raised in this cause helps WWF carry on its mission to protect the world's wildlife and wilderness.
Dear Mr. Vecchia:

I am writing to ask BLM to be sure to include wilderness protection for the Camel Back area as much 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 Uncompahgre 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.

Sincerely yours,

Nina Johnson
747 12th
Boulder, CO 80302

---

Gene Vecchia
Bureau of Land Management
2505 S. Townsend Ave.
Denver, CO 80222

[Signature]

Paul E. Laopala
485 Mesa Verde
Cortez, CO 81321

Dear Mr. Vecchia:

[Handwritten note]

[Signature]

Claire C. Poole, Psy.D.
Licensed Clinical Psychologist

The PAPER

9/18/81

Gene Vecchia
Bureau of Land Management
2505 S. Townsend Ave.
Denver, CO 80222

Dear Mr. Vecchia:

I am delighted to hear that the Gunnison Gorge was also recommended for wilderness protection under the Wild and Scenic Rivers Act. Let me urge you to reconsider your recommendation for the Camel, Back and Uncompahgre areas. With areas like Gunnison Gorge one of the most underdeveloped and underpopulated areas in the state, it seems entirely unjustified to deny it wilderness protection just because it is not as scenic as some other areas.

Sincerely,

Claire C. Poole, Psy.D.
Sept. 16, 1987

Mr. Vecchia,

I am writing this in reference to the BLM’s Draft Uncompahgre Basin Resource Management Plan recently proposed. I applaud the BLM’s recommendation of some 21,000 acres for the Uncompahgre Basin Resource Management Plan. This is a reasonable balance and is consistent with the Uncompahgre BLM’s own acreage objectives for the basin. I urge you to continue to work with the BLM to develop a plan that is acceptable to all parties involved.

The proposal to limit ORV use to existing roads and/or areas which would be closed under the BLM’s Preferred Alternative there would be only 261.589 acres open to ORV use, 29,821 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.

I feel it is extremely important to prepare roads and/or areas which would be available for ORV use and only to ORV use. This would allow the BLM to develop a plan that meets the needs of all users.

Sincerely,
John Spade

---

Dear Mr. Vecchia,

Dear Mr. Vecchia,

I was invited to this year’s Annual BLM Resource Conference in Montrose, Colorado. I am sure these folks will have additional thoughts and comments on this issue. I appreciate the chance to comment on this Draft plan.

An Interested Citizen,

Larry Abbott

---

Mr. Robert E. Vecchia

BLM Team Leader

Uncompahgre Basin Resource Management Area

2505 South Townsend Avenue

Montrose, Colorado 81403

Dear Mr. Vecchia:

I have reviewed the BLM’s Draft Uncompahgre Basin Resource Management Plan/Environmental Impact Statement (ERMP/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 acres of land available for ORV use. The Draft ERMP/EIS says there are currently some 444,521 acres available for ORV use and only 21,038 acres closed to that use. In BLM’s Preferred Alternative there would be only 361,583 acres open to ORV use, 27,021 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 ORVs for review by the general public land’s users. I am sure these folks will have additional thoughts and comments on this issue.

I appreciate the chance to comment on this Draft plan.

An Interested Citizen,

Larry Abbott
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 offers 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. There are no timber or mineral conflicts, and planned cutbacks in grazing will protect the riparian of the perennial Roundeau 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.

Thus 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 wildlife, the wildlife 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 your efforts.

Sincerely yours,

[Signature]

[Address]

Subject: Uncompahgre 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.

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Thank you once again for your efforts.

Sincerely yours,

[Signature]

[Address]
Mr. Gene Vecchia
RUP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

September 27, 1987

Mr. Gene Vecchia
RUP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. 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-Gore 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.

I would like to encourage the BLM people to recommend the Camel Back (Roubideau Canyon) and also the Adobe Badlands for wilderness designation. With so few unpolluted areas such as these remaining and with essentially no conflicts with wilderness designation, it makes sense to protect these unique untouched 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 to 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 bugle all night long then you gain an appreciation for these animals that can never be lost. Since the ski area developers can't be entrusted 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 land under its control. 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, elk 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

Sr.

Mr. Gene Vecchia
RUP Team Leader
Bureau of Land Management
2505 S. Townsend Ave.
Montrose, CO 81401

Dear Mr. Vecchia:

This letter is in regard to Uncompahgre, Camel Back, Adobe Badlands 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 please 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 Badlands have not been 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 OYW use are to be cut back or prohibited, but the 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 Badlands is a habitat of an endangered species. Both these areas have important wilderness characteristics, including a scene containing colorful sandstone formations in Camel Back, and views of the San Juan Mountain Range and Uncompahgre River valley in Adobe Badlands.

We need more people standing up to protect these wild places.
The third action by BM to which I object is a five-year "grace period" extended to developers of a ski area at Storm King. According to BM itself, this area is a critical elk calving ground. In addition, development here would also have an adverse effect on mule deer foraging. 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 a new home that developers value 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 use is allowed to proceed. There must be a better way to assess "compatibility". Thank you for your time and consideration.

Sincerely,

Chris Seitz
444 South Hilldale
Salina, Kansas 67401

September 21, 1987

Gene Vecchia
BM Field Leader
Focus of Land Management
2505 S. Townsend Ave.
Montrose, CO 81403

Dear Mr. Vecchia:

I am writing concerning three different areas you studied for Wilderness areas and a Ski area proposal.

First of all, I would like to thank you for recommending the Gunnison Gorge wilderness area for protection. The importance of this decision cannot be overstated. This area contains 125 miles of the Gunnison River which has been up for recreation as a Wild River under the Wild & Scenic Act. The BM 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 no timber or mineral conflicts over this 10,400 acres of land. It also contains about 1.7 miles of potential Boulevard Creek where it cuts through a 900 foot deep canyon of beautiful sandstone formations of the Uncompahgre Plateau. More important several endangered species of plants and birds live in the area which would greatly benefit from a wilderness designation. I understand why the BM decided NO on this proposal. Please explain why they have made this decision. Our state is experiencing many problems with protection of our natural areas and animals; we have a great opportunity to forever secure the wilderness we know and keep the unique attractions that people from all over come to see.

The third area in the Adobe Badlands which contains 10,425 acres of the Gunnison County Badlands. They have toured the area and gone and found on real mineral potential, and obviously there is no timber for cutting. We have an area that provides sweeping vistas in the San Juan Mountains and the Uncompahgre Valley. It also contains the endangered Unita Basin Kocher's Cactus which is itself to a local treasure. Again, this is an area which there is not at all of conflict over a wilderness designation. I am very confused by the BM decision not to recommend this area, and I would greatly appreciate an explanation.

The last issue is about the Scissor King ski area proposal. This area is 3,000 acres of BM land on the north end of Cameron Ridge. You the BM have stated that this ski area would eliminate the Elk CALVING area and have an impact on the Elk's feeding grounds. Their solution to the problem is to grant a 5 year grace period to the developers to go ahead and start with the ski area and then let them know if they will approve the ski area after they have spent 5 years developing the 3,000 acres of land. I am 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, and more needs to be done. The BM needs to take another look at their decision, and the rule of the BM in land management decisions. The Elk and Deer populations cannot come forth and speak for themselves in matters, they are subject to the whims of men. I feel that the Elk & Deer should have their lasting places protected, its not like they have many places all over the state.

Thank you for your very much for your time with these not important matters.

Sincerely,

Joe Huskey

9-24-87

Dear Mr. Vecchia,

We are writing to inform you of our findings on the wilderness recommendations of three areas in the Montrose BM district. We frequently see wilderness areas of the state for backpacking trips. We have talked to all the public lands areas of the state. We are very concerned about the future of wilderness in our state.

We are happy to hear that the BM is recommending to protect the Gunnison Gorge area. This area with its proximity to the Black Canyon of the Gunnison National Monument and 12 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 going on is not an issue in this area to protect the virgin area. Why not protect the entire 10,402 acres with a wilderness designation? We would like to see this area of the Uncompahgre Plateau saved before it is too late. Please explain your stand on this.

We also ask you to recommend the Adobe Badlands for wilderness as it has amazing 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 mountain and riparian wilderness areas.

We thank you for your time in considering our views on this matter.

Sincerely,

Mary Wilson
Judy Wilson
201 S. Wilmot
Castle Rock, CO 80104
Dear Larry Capps,

I am writing to you about the Storm King Trail Area near Steamboat Springs, Colorado. I am aware that the development of a trail system in this area is a sensitive topic and requires careful consideration. If the recommendation to establish an interconnected trail system is developed, there may be some unintended consequences.

Second, please recommend the Storm King Trail Area for Wilderness designation. Please note that the current recommendation to establish an interconnected trail system might be considered a recreation area and will have been afforded the necessary protection so that future generations may enjoy its splendor.

Another discrepancy in the report I would like to address is the exclusion of the Aspen-Bedford from the wilderness designation. Again, this decision is unprecedented. Those familiar with the area know there are certain resource conflicts with wilderness designations. That such an incredibly diverse area be excluded from the designation is itself a disgrace. I ask that the Storm King Trail Area be given wilderness designation, to do otherwise would be a travesty.

To my consternation though, I understand that your draft for the Uncompahgre Basin Plan that you have failed to include the Storm King Trail 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 use of ATV's 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 roads only, with stiff fines for any offenders. I would support the restriction of these areas also, with the same penalties against offenders. I know enforcement would be difficult, at least, but in some areas 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.

Yours truly,

cc, Congressman Dan Campbell

Julie M. Emerson

P.O. Box 44

Laramie, Wyoming

Dear Mrs. Vecchia,

As a citizen of western Colorado and an avid outdoorsmen, I would like to offer my thanks and congratulations to you and the BLM for the wilderness designation recommendation for the Gunnison Gorge Wilderness Study Area. If the recommendation is accepted as is, certain restrictions and controls, part of the west will be saved from further exploitation and will have been afforded the necessary protection so that future generations may enjoy its splendor.

To my consternation though, I understand that in your draft for the Uncompahgre Basin Plan that you have failed to include the Storm King Trail 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 evidence I, too, have overruled that the use of ATV's 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 roads only, with stiff fines for any offenders. I would support the restriction of these areas also, with the same penalties against offenders. I know enforcement would be difficult, at least, but in some areas 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.

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Yours truly,
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 economic potential. It is difficult not to conclude that 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, hearty outdoor types, often referred to as 'litterati.' It seems to be that this is a misconception.

It is true that, since roadbuilding is not permitted, those who can only experience the outdoors 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 those 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,

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 (11:15-24) 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 set 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 traces possible.

I would like to commend the BLM on its decision in the Adobe Badlands and the Camel Back study areas.

Sincerely,

Chuck Worley
Cedaredge, CO
Robert E. Vecchia  
Bureau of Land Management  
Uncompahgre Basin Resource Area  

Dear Mr. Vecchia,

In the 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 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.

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 Uinta 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.

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 Cimmaron Ridge are critical to the survival of elk that use the lands as calving grounds. Any development would also have an adverse impact on moose and deer feeding areas. For these reasons, the grace period

Sincerely,

William J. Tschida  
Kathleen A. Tschida  
John P. Tschida  
Natalie A. Tschida  
Julie R. Tschida

Robert E. Vecchia  
RTP Team Leader  
Bureau of Land Management  
2505 S. Townsend Ave.  
Montrose, CO 81401

Gene Vecchia  
RTP Team Leader  
Bureau of Land Management  
2505 S. Townsend Ave.  
Montrose, CO 81401

Dear Mr. Vecchia,

We would like to thank the BLM for recommending all 21,038 acres of the Gunnison gorge wilderness study area for wilderness protection. We support continued protection of the Gunnison Gorge.

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.

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 with resource, not give one a five-year headstart over the other.

Sincerely,

Ellen B. Braten  
Eenie D. Braten

Gene Vecchia  
RTP Team Leader  
Bureau of Land Management  
2505 S. Townsend Ave.  
Montrose, CO 81401

We would appreciate your sharing our concerns with the above issues when preparing your final draft of the Uncompahgre Basin RMP.

Sincerely Yours,

Harry Weihrauch  
Harry Weihrauch  
816 University  
Boulder, CO 80302

We would 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. 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 with resource, not give one a five-year headstart over the other.

Sincerely,

Ellen B. Braten  
Eenie D. Braten

Gene Vecchia  
RTP Team Leader  
Bureau of Land Management  
2505 S. Townsend Ave.  
Montrose, CO 81401
Dear Sir,

Thank you for your recommendation for wilderness for the Gunnison Gorge. I urge you to consider also to recommend Adobe Badlands 

I would also like to urge you protect Storm King Mountain for its elk habitat.

Thank you, 

Sincerely,

[Signature]

\[136\]

1775 F Third Ave
Durango CO 81301
September 30, 1987

Gene Vecchia
RTP Team Leader
Bureau of Land Management
700 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 flora, 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

\[68\]

[Signature]
Dear Mr. Vecchia:

I wanted to comment on the draft Uncompahgre Basin Resource Management Plan.

First, I went to endorse the recommendation of the Gunnison Gorge for wilderness protection. This would make a fine addition to the Wild and Scenic Rivers. The expansion of the area adjacent to the already protected Black Canyon is right in line with the latest thinking of the need to protect large areas of similar ecology. All ecoregions are not as inherently stable, and every effort to increase their size helps.

Next, I am disappointed that the Camel Back and Adobe Badlands were not included in the wilderness recommendation.

Camel Back, according to your own report, has no mineral conflicts. The area is one of the few potential wilderness areas in the Uncompaghre 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.

I don't understand the lack of inclusion for Adobe Badlands. Clearly again, there are no mineral or timber conflicts. This desert with its rimrocks should be protected by wilderness recommendation.

Finally, I don't understand the Bureau's intentions with the potential Starke ski area site. With the downturn in ski business, along with increased competition from existing areas, I really don't think that another destination ski area has much of 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 travel would set a poor example for other developers. The Bureau's 5-year wait-and-see plan will give the developers a free leg up on the expense of selling the other resources, primarily ski.

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 Cunningham, P.E.
Grand Junction, Colo.
Oct. 7, 1987

Dear Mr. Vecchia,

It appears that you have earned some recognition. Congratulations!

Regarding the wilderness recommendations, the BLM is 'right on' with Grandy Grove. Thank you, and all the others involved. I believe that Camel Rock should also be recommended for wilderness. We should be more generous toward wilderness than we are toward those who so consistently and consistently compromise and destroy wilderness reserves.

In addition, Steep King Mountain should be protected for use and alike. More than enough of our mountains are dedicated to the ski industry, a situation that can never be reversed.

Sincerely,
Henry Leckood

--End--

Come. The wild people have managed these lands for years and do it well. They have respect for it. Please see that they keep it.

Mrs. Robert Gray
Horse Creek Rd.
Glenwood, Colo. 81601

Robert E. Vecchia
NRM Team Leader – BLM
2500 South Townsend Ave.
Minneapolis, Colo. 81401

Dear Mr. Vecchia,

The best alternative offered to support the multiple-use objective with the forest detriment 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 hundreds of cattle graze on and pass through with no ill effect only tramped to feed 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 cars, boats, plastic and general trash left on land for years to

Date:

Robert E. Vecchia
NRM Team Leader – BLM
2500 South Townsend Ave.
Minneapolis, Colo. 81401

Dear Mr. Vecchia,

The following are my comments concerning the Incomparable Basin Resource Management Plan and Environmental Impact Statement:

The best alternative offered to support the multiple-use objective, with the forest detriment to livestock grazing is the 'Continuation of Current Management.'

Under this policy, through 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 sustainable basis.

Sincerely,

[Signature]

[Signature]
Mr. Vecchia

Dear Mr. Vecchia,

I would like to congratulate you on your wilderness recommendation for Gunnison Gorge. It is to be hoped that this protection will soon be law. However, for the BLM to recommend the wilderness recommendation for the Camel Back Wilderness Study Area, there are no known resources of importance here, by the BLM's own admission, and this wilderness designation would protect this important riparian community on the Uncompahgre Plateau. I hope the BLM will also recommend the Gunnison Wilderness, with its rare white-cedar forest, for wilderness designation.

Sincerely,

Bruce Berger
Box 402
Aspen, CO 81611

Mark N. Williams

October 12, 1987

Gene Vecchia
RMF Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia,

Your Bureau's plans for future recommendation of land use and wilderness designation 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 much less one at the north end of Cimmaron 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 Cimmaron Ridge for the preservation of our wilderness areas that need so much protection.

Sincerely,

Mark N. Williams

October 14, 1987

Robert B. Vecchia
RMF 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 detrimental to livestock grazing, is the "Continuation of Current Management." Under this policy, through tactical 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 multiple recreation interests can be set on a site-specific basis.

Sincerely,

Chief W. Peters

Date:

10/12/87

Mark N. Williams

October 12, 1987

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RMF Team Leader
Bureau of Land Management
2505 S. Townsend Avenue
Montrose, CO 81401

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October 14, 1987

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2505 South Townsend Avenue
Montrose, Colorado 81401

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Montrose, CO 81401

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Please rewrite your recommendations for Camel Back, Adobe Badlands and Cimmaron Ridge for the preservation of our wilderness areas that need so much protection.

Sincerely,

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October 14, 1987

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RMF Team Leader - BLM
2505 South Townsend Avenue
Montrose, Colorado 81401

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Sincerely,

Chief W. Peters

Date:

10/12/87

Mark N. Williams
The following are my comments on 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.

Sincerely,

[Signature]

Date: 10/12/97

Robert E. Vecchio
BGM Team Leader - BLM
2905 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vecchio,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement.

1. (Do) (Do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Cinnamon Sedge Wilderness Study Area.

The Cinnamon Sedge and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use objectives can be mitigated through the Allotment Management Plans.
I am writing to you again about the proposed Camelback and Adobe Hills wilderness study areas.

I am a native. My grandparents were cattle men on a ranch near Wyoming. In those days they didn't have income and property taxes. Today cattle men 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 Uncompahgre 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 his hands on and grazed to the hilt. To Aidel's, 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 suburbs- The Meadows.'

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 properly) reduced the herd population of the allotments."

"Today sagebrush, stands of pinion-pinyon 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.

I live on Log Hill and personally know how hard it is to restore 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, submitted statements for the record supporting nearly five to one the Colorado Open Space Council citizen recommendations for three wilderness areas totaling about 170,000 acres.'

Certain special interest groups especially the Chamber of Commerce whispered in the ears of the Forest Service Administration who whispered into the Forest Service's receiver 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 multi-use-oriented special interest groups who want public land for their own private use and profit.

Sincerely,
W. Rodney Niximen
78445 County Rd.
Montrose, Colorado 81401
Gene Vecchia, RMP Team Leader
Bureau of Land Management
2505 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 area's fishing and hiking.

I also want to ask you to recommend both Dobe Badlands and Camel Back (Roubideau Canyon) for wilderness designation. By BLM's own admission, these are absolutely no resource conflicts with wilderness designation in the areas. Both areas have low potential for minerals and there is obviously no timber. Your past proposals in these areas have not been supported, I hope you will reconsider them and recommend 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 of these areas should be

Sincerely,
Mike Campbell

eliminated now rather than allowing them to proceed with the 5 year grace period in which the developers may proceed with the development. I feel the elimination of old mining areas and the recreation areas as a result of the development actions should definitely be avoided.

Thank you for your time and consideration.

Sincerely,
Mike Campbell

October 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 last vestige of wilderness.

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 Komison 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 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 those areas as wilderness.

Thank you for your consideration and action on these thoughts.

Sincerely,

Mike Campbell
6333 Kendall Street
McKee, Co. 80803
Dear Hr. Yeechia:

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 limitations to livestock grazing, is the continuation of current management. Under this policy, through Allotment Management Plans, the objective is 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 lived here since 1968 and I find the current management is taking care of my range in best condition.

Signed:

[Signature]

Andrew McCorkle
3545 Berkeley Ave
Boulder, CO 80303
October 13, 1987

Gene Vecchia, RMP Team Leader
Senior Land Management
2905 South Townsend Ave
Monroe, CO 80131

Please keep permission to develop a ski area on the north end of Cameron Ridge. Your own plan admits that such a development would eliminate critical elk calving habitat. Your idea for a five-year "grace period" is a cop-out. You must decide now whether plans for Storm King ski area should proceed or not. We have so many ski areas in Colorado already. Why destroy another on public land?

Thank you for recommending Cameron Gulch for wilderness. I have enjoyed hiking there in the past.

But I do not understand why Cameron Back and Adobe Backlands were not recommended for wilderness. Both areas possess unique wilderness characteristics and no significant conflicting potential uses. Please include those comments in the public hearing record.

[Signature]
Gene Vecchia
1966 Clover Court
Grand Junction, CO 81504
October 19, 1987
Montrose, CO 81401
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 cross-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 Redcliff 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 for 20 years. The Court 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 4x4s - 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.

Sincerely,

Jack E. Williams

Date: October 16, 1987

Robert E. Vecchia
RMF Team Leader - BLM
2505 South Townsend Ave
Montrose, CO 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 **Appropriate Current Management**. Under this policy, through Allotment Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitat, control erosion and salinity, utilize mineral and forest products, and protect our diverse recreation interests can be met on a site-specific basis.
Dear Mr. Vecchia,

I would like to begin by expressing my agreement with the Bureau of Land Management's recommendation to designate 24,000 acres of the Canebrake Range Wilderness Study Area for wilderness protection.

In addition, I would like to extend my support for wilderness protection for the Canebrake area and the Adalee Badlands. By my own admission, they are absolutely no resource conflicts within the Canebrake area. Canebrake is an area of only a few potential wilderness areas, but it is an area of immense natural beauty and wilderness designation would greatly benefit the area as well as provide for the protection of natural, irreplaceable plant species. This is an opportunity to add another precious area to the beautiful wilderness of the United States.

I am sure that you will agree with me. I hope that your agreement will be expressed in your next letter or in the next letter that you will send to me.

Sincerely,

Diane Kelley
2851 Scituate Rd
Evergreen, CO
60439
Dear Mr. Vecchio,  

I am writing you in support of the wilderness designation of the Gunnison, Caneel, and Avalanche Basin areas. I spent a month on a botanical survey in June and July, collecting species from the Gunnison area, and after extensive study, I can attest to the beauty and uniqueness of the area. I believe the Gunnison and Avalanche areas are critical in maintaining the biodiversity of the region.  

Sincerely,  

[Signature]

Dear Gene Vecchio,  

I am writing to you in support of the proposed wilderness areas in the Medicine Bow National Forest. I believe the proposed wilderness areas will help protect the area from further development and ensure the preservation of natural resources. I am especially concerned about the proposed wilderness areas in the Medicine Bow National Forest.  

Sincerely,  

[Signature]
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 they are less than 10% of all California wilderness lands now protected from further incursion, it would be unwise to recommend further development which would allow development of these vital wildlife and wildland refuges.

Please recommend Adobe Badlands, Camel Back, and all of Guinnion Gorge for wilderness designation.

Thank you,

Sincerely,

[Signature]

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Gene Vecchia,

I am very concerned about some recent BLM recommendations, although I was not able to locate the BLM proposals. Although I am concerned that the Adobe Badlands were not recommended for wilderness protection, I am concerned that Camel Back and Adobe Badlands were not recommended for wilderness designation. Camel Back is also one of the two places left on the Uncompahgre Plateau, which is a major landform in western Colorado facing any designated wilderness. Furthermore, several endangered species exist on Camel Back and would benefit from wilderness designation. Camel Back is also one of the places left on the plateau which is a potential wilderness. The Adobe Badlands should also be designated as wilderness since the contracts with wilderness designation are nonexistent.

Another issue I am concerned about is the Storm King Ski Area Site on the north end of Guinnion Ridge. This land is central for all other mountain and mud deer hunting. Allowing the ski area developers 5 years to proceed with the ski area seems like very irresponsible management. Please support the Ell on Storm King Mountain instead of the Ski Area developers.

Thank you,

Suzanne falsehood
To Whom It May Concern,

These are my written comments on the Uncompahgre Basin Resource Management Plan, Environmental Impact Statement, and Camel Back Wilderness Study Area. I am in favor of the Current Management Alternative for the Uncompahgre Basin. I am in favor of 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 Uncompahgre 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 day-fee or a yearly users-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 prospectors 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 pickup 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 recreationalists.

Thank you.

Sincerely,

[Signature]

DELTA VETERINARY CLINIC

874-7598

DR. TOM DOCH

1365 Bluff St.

DURANGO, CO 81301

1-303-874-5190

Date: Oct. 3, 1987

Robert E. Vecchia

205 South Townsend Avenue

Montrose, CO 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

1. The best Alternative offered to support the multiple-use objective, with the lowest detrimental impacts was the "Continuation of Current Management Plan." Under this policy, through Allotted Management Plans, the objectives to enhance livestock grazing and wildlife and riparian habitats, control erosion and salinity, utilize minimal and forest products, and protect our diverse recreation interests can be met on a site-specific basis.

2. While I am in favor of the Current Management Alternative for the Uncompahgre Basin, I am in favor of 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."

3. I am also advocating restriction of Off-Road Vehicles (ORVs) to be used only on designated roads in the entire Uncompahgre 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.

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Thank you.

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[Signature]

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205 South Townsend Avenue

Montrose, CO 81401

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2. While I am in favor of the Current Management Alternative for the Uncompahgre Basin, I am in favor of 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."

3. I am also advocating restriction of Off-Road Vehicles (ORVs) to be used only on designated roads in the entire Uncompahgre 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.

4. 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 day-fee or a yearly users-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 prospectors 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 pickup 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 recreationalists.

Thank you.

Sincerely,

[Signature]
Dear Sir,

What makes Colorado a gorgeous and wonderful state is what is the natural beauty in Colorado. What is this state most precious is not the land itself, but the natural beauty that is protected by the millions of public land seekers who think the maintenance of our natural land are indeed your number one priority.

In particular, I feel that you should support the Seeds of Liberty Band is, in the Uncompahgre Basin, an area designated for its wilderness. I don't think this is asking too much. Why enforce millions of people to enjoy our public land when they can enjoy the same land and protect the quality of life for all and give other the benefits of this great land and enjoy their lives for the better?

Thank you,

Yours sincerely,

[Signature]

J. Davis Poff
905 Youngfield
Phillyburg, MN

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Dear George,

I am writing in response to the wilderness recommendation for the Uncompahgre Basin Resource Management Plan.

I understand the importance of recommending to the United States Congress for the Uncompahgre Basin Resource Management Plan.

I would like to thank you for your support and recommendation for the Uncompahgre Basin Resource Management Plan. There are no reservations or conflicts in the area, which is important for the many endangered species of plants that exist which benefit from wilderness designation.

I would also like to recommend the Seeds of Liberty Band is, in the Uncompahgre Basin, an area designated for its wilderness.

I am very familiar with the Seeds of Liberty Band is, in the Uncompahgre Basin, an area designated for its wilderness.

Thank you,

Sincerely,

[Signature]

[Name]

---

Dear Ben,

I would like to tell you how glad I am to hear that you have been named for the Uncompahgre Basin Resource Management Plan.

I am very familiar with the area and I am very pleased with the decision of recommending the Seeds of Liberty Band is, in the Uncompahgre Basin, an area designated for its wilderness.

I don't understand why Canal Bank has not been designated a wilderness area. This area does not contain any timber or mineral resources or anything like that. Why the problem? The BLM has already stated that they want to cut back on grazing, but let the land stand alone, stop it from happening, designate me a wilderness area.

As far as I can tell, why the problem? Can you explain it to me, Ben? There is no timber available. This land also contains a couple of endangered species of Cattails.

Thank you,

Sincerely,

[Signature]
Dear Sirs:  
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 the 27,065 acres of the Gunnison-Crested Butte Wilderness Area for wilderness protection.

I would like to ask you to reconsider in the BLM that they give Camas/Beck a wilderness designation. BLM has admitted that there are no resource conditions within Designation the 10,402 acres the wilderness area.

In addition, 10,402 acres exist within the Adobe Badlands in need of a wilderness designation: within these badlands exist an endangered species of fauna, possibly evidence of a further need for the designation demand in present existence.

Thank you for your time.

Sincerely,
Jessica McCloud

Penelope Cusick
EOH
Northwest, Colorado

Dear Mr. Vecchia,

Thank you very much for your interest in recommending Gunnison Gorge for wilderness protection! Many of my friends have visited and loved it. As yet, I have had a chance to do neither—so I'm glad to have you help the cause.

Please, please, give the same recommendation for Camas/Beck, and the Adobe Badlands. There seems to be no conflict with either the Adobe Badlands, however, it is my understanding that the current management plan for Camas/Beck does not recognize no resource conflicts.

I intend to increase my efforts to protect riparian habitat of the Gorge, and to protect the Adobe Badlands as well. The Adobe Badlands are important to the Gunnison-Bedford Regional Management Plan.

Yours sincerely,

Penelope Cusick

Dear Mr. Vecchia,

I am writing concerning the recent Uncompahgre Basin Resource Management Plan. I understand the KMP 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-Bedford Regional Management Plan, that the Gorge be designated as a wilderness area. I am concerned that the Gorge be destroyed for the sake of a few dollars. If this happens, I fear that the quality of living will be negatively affected. Thank you for your help.

Penelope Cusick

Dear Mr. Vecchia,

Thank you very much for your interest in recommending Gunnison Gorge for wilderness protection! Many of my friends have visited and loved it. As yet, I have had a chance to do neither—so I'm glad to have you help the cause.

Please, please, give the same recommendation for Camas/Beck, and the Adobe Badlands. There seems to be no conflict with either the Adobe Badlands, however, it is my understanding that the current management plan for Camas/Beck does not recognize no resource conflicts.

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Penelope Cusick

Gene Vecchia
9/25/87  
BLM  
912 South Broadway  
Boulder, Colorado  
90150  

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Please, please, give the same recommendation for Camas/Beck, and the Adobe Badlands. There seems to be no conflict with either the Adobe Badlands, however, it is my understanding that the current management plan for Camas/Beck does not recognize no resource conflicts.

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Penelope Cusick

Gene Vecchia
305 S. Townsend Ave.  
Hesperus, CO 81330  

Thank you very much for your interest in recommending Gunnison Gorge for wilderness protection! Many of my friends have visited and loved it. As yet, I have had a chance to do neither—so I'm glad to have you help the cause.

Please, please, give the same recommendation for Camas/Beck, and the Adobe Badlands. There seems to be no conflict with either the Adobe Badlands, however, it is my understanding that the current management plan for Camas/Beck does not recognize no resource conflicts.

Yours sincerely,

Penelope Cusick
Dear Gene Vecchia:

I was surprised and saddened to hear of the wilderness study areas that have not been designated as wilderness areas. Since these areas are important habitats for wildlife species, I would like to voice my approval for the recommendation given by the BLM for wilderness protection in the Gunnison Gorge. The Camel Back and Adobe Badlands are wilderness study areas which I feel have much to recommend them. Although 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. Without full protection, the wilderness qualities will be destroyed. I believe that people can enjoy the beauty and peace of these areas without the fear of losing it.

Thank you for considering the recommendation. I hope you and the BLM staff will continue to maintain the wilderness areas.

Sincerely,

[Signature]

Deputy DA
665 E Wingate St.
Denver, CO 80222

Mr. Vecchia,

Thank you for recommending the Adobe Badlands and the Camel Back as wilderness study areas. I believe that these areas are important habitats for wildlife species and should be protected.

Sincerely,

[Signature]

Scott McMillan
Public Information Officer
BLM
Gunnison Ranger District

Dear Gene Vecchia,

I would like to thank you for recommending the Adobe Badlands and the Camel Back as wilderness study areas. I believe that these areas are important habitats for wildlife species and should be protected.

Sincerely,

[Signature]

Scott McMillan
Public Information Officer
BLM
Gunnison Ranger District
Mr. Gene Vecchia  
RMP Team Leader  
2505 South Townsend Avenue  
Montrose, Colorado 81403

Dear Mr. Vecchia,

I was very pleased to see that the BLM has recommended the Gunnison Gorge WSA as wilderness in the Uncompahgre Basin RMP. The area is quite beautiful, and the Gunnison River running through it makes it a very unique area.

Unfortunately, you neglected to recommend the excellence of the area. As wilderness in the neighboring Basin RMP. The area is quite beautiful, and the Gunnison River running through it makes it a very unique area.

I was also happy to see the Adobe Badlands as recommended in the Basin RMP. It is home to the endangered White-tailed Antelope, 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 reason to designate as a 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 in developed and Colorado is a haven to escape back in the wilderness.

Sincerely,
Laurie Thayer  
2212 Mapleton Rd.  
Boulder, CO, 80302

Date:  
10/24/87

Robert E. Vecchia  
RMP Team Leader - BLR  
2505 South Townsend Ave  
Montrose, Colorado 81403

Dear Mr. Vecchia,

I am writing to thank you for recommending the Gunnison Gorge WSA as wilderness in the Uncompahgre Basin RMP. I was very pleased to see that the BLM has recommended the area for wilderness designation.

I am familiar with both areas and I remember reading an archaeological site in the Adobe Badlands area that dated to 3000 B.C. That area is unique and feels like the Garden of the Gods. I hope you understand the importance of protecting these unique areas.

Please consider your decision.

Sincerely,
Sarah Molander
Dear Mr. Vecchia,

This letter strongly endorses your recent letter as it concerns the matter of the proposed conservation alternative for the Cold Spring Creek area. Based on my observations and discussions with numerous residents of the area, I wholeheartedly support your position and urge the Bureau of Land Management to consider the conservation alternative as the most viable option for the protection of the area.

The proposed grazing plan, as well as the proposed treatment plan, do not adequately address the ecological needs of the area. The conservation alternative, on the other hand, provides a balanced approach that respects the natural environment and promotes sustainable land use.

I appreciate your continued efforts to protect the area's natural beauty and ecological integrity. Your support and advocacy are crucial in ensuring that the needs of this unique and precious resource are met.

Sincerely,

[Signature]
Dear Mr. Reiche,

On Monday, the Gunnison Valley Management Group will be meeting to discuss the future course of our operation. The meeting is tentatively set for 6:00 PM at the local community hall. We would like to extend an invitation to you and any other interested parties to attend.

The agenda will include updates on recent conservation efforts, the proposed development of new wildlife habitat areas, and a review of the current status of the local wildlife population. We believe that this meeting will be of great interest to you and your organization.

Please consider attending and sharing your expertise. Your presence would be valuable in helping us to develop a comprehensive strategy for the future of our operation.

Please confirm your attendance by contacting our office at [phone number]. We look forward to hearing from you.

Sincerely,

[Signature]

Gunnison Valley Management Group
Robert R. Vechcia
BMP Team Leader - BLM
2505 South Townsend Avenue
Monrovia, Colorado 81401

Dear Mr. Vechcia,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I (do) (dis)agree with the BLM’s Proposed Action, the All Wilderness Alternative, for the Uncompahgre Basin Wilderness Study Area.

The Cavelo 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 Plan.

Sincerely,

[Signature]

Robert E. Vechcia
BMP Team Leader – BLM
2505 South Townsend Avenue
Monrovia, Colorado 81401

Dear Mr. Vechcia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statements:

The best alternative offered to support the multiple-use objective, with the fewest detrimental to livestock erosion, 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, deliver minimal and future productivity, and protect and diversify recreation interests can be set on a site-specific basis.

[Signature]

Robert E. Vechcia
BMP Team Leader – BLM
2505 South Townsend Avenue
Monrovia, Colorado 81401

Dear Mr. Vechcia,

I’m writing to express my appreciation for the BLM’s decision to recommence Uncompahgre Gorge for wilderness protection. The great striking and beautiful scenery of this area should rightly be preserved as wilderness area. While this written by the BLM warrants my appreciation, I would like to express my regrets at your exclusion of recommendations for Cavelo Back and Adobe Badlands.

I was one of the few remaining potential wilderness areas on the Uncompahgre Plateau, deserves your recommendation for wilderness designation. The endangered species of plants which occur in the area would benefit from wilderness designation, as would the big game population. As there are no timber or mineral leases to interfere with the designation, please reconsider your recommendation.

[Signature]

Robert Wilson
Bureau of Land Management
2505 S. Townsend Ave.
Monrovia, CA 91011

Dear Mr. Vechcia,

I would favor the unused closed and limited use designation for ORV use which would give the most protection for endangered, threatened, candidate, and sensitive plant species and animal species and for the unique plant associations found there. Careful and adequate monitoring must be maintained to assure that these species are indeed protected.

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 irreplaceable and once destroyed are lost to scientific study forever.

Thank you again for this opportunity to voice comments.

Sincerely,

[Signature]

Robert Wilson
Bureau of Land Management
2505 S. Townsend Ave.
Monrovia, CA 91011

Dear Mr. Vechcia,

One other issue in the Uncompahgre Basin BMP is the Storm King Ski Area site. Your plan says the ski area would eliminate the elk calving habitat and impact mule deer foraging 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 enjoying resources that must be preserved.

I realize that you must consider many conflicting interests in making your recommendation but please reconsider recommending Cavelo Back and Adobe Badlands as wilderness areas and stopping the destruction of an elk calving habitat.

Sincerely yours,

[Signature]

Robert Wilson
Bureau of Land Management
2505 S. Townsend Ave.
Monrovia, CA 91011
Dear Mr. Vecchia,

In a representation of the Bureau I address my comments to you.

I am very appreciative of the Bureau's wilderness protection recommendation of the Caneel Back country. In fact, the area has been a beautiful country. Making this recommendation, it is an important sign of common interest. Thank you for your help in this work.

The Caneel Back country as well as the Adobe Badlands also need your wilderness support. The information contained in the draft Uncompahgre Basin BMP leads me to believe that these areas have no competition from timber/uranium interests. The question then, is why doesn't the BMP recommend wilderness designation for Caneel Back and Adobe Badlands? The Uncompahgre Plateau will continue to be ruined unless you support at least one spot, the Caneel Back, for wilderness protection.

Please take my comments into serious consideration and think our future together on the Western slope depends on us working together.

Yours truly,
Michael D. Fiske

Date: 11-2-57

Robert E. Vecchia

Bureau of Land Management

Dear Mr. Vecchia,

I believe that the Caneel Back area is suitable for wilderness designation and encourage you to reconsider the decision.

Thank you for the opportunity to comment.

Sincerely,

Michael D. Fiske

Date: 11-2-57

Robert E. Vecchia

Bureau of Land Management

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 forest 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 wildlife, utilize mineral and forest products, and protect our diverse recreation interests can be set on a site-specific basis.

Yours truly,

[Signature]

Date: 11-2-57

Robert E. Vecchia

Bureau of Land Management

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Yours truly,

[Signature]
Robert E. Vecchia  
RIP 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:

[Signature]

Melin K. Band
430-1550 Rd.,  
Delta, Colo.
Robert E. Vechta
RO Team Leader - RIA
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vechta,

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. The alternative best exemplifies the multiple-use management.

The Ceman 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:

Date:

Robert E. Vechta
RO Team Leader - RIA
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vechta,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

[Text of comments]

Signed:

Date:

Robert E. Vechta
RO Team Leader - RIA
2505 South Townsend Avenue
Montrose, Colorado 81401

Dear Mr. Vechta,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement:

[Text of comments]

Signed:

Date:
The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I do (do not) agree with the BLM's Proposed action, the No Wilderness Alternative, for the Uncompahgre Basin Wilderness Study Area.

The Caneal Back and Paddle 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 met through the Allotment Management Plans.

Please do not split the Caneal Back into the No Wilderness Alternative. We feel the area would best be in the best interest of the surrounding area. We do not think it would serve the area for anything more than current use.

Signed:

[Signature]

Robert E. Vecchio
BLM Team Leader - NW
2505 South Townsend Avenue
Monrovia, California 91011

Dear Mr. Vecchio,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I do (do not) agree with the BLM's Proposed action, the No Wilderness Alternative, for the Uncompahgre Basin Wilderness Study Area.

Yield areas Desimation—Based on the arguments I have heard and read, I do not find sufficient reason for a change in status of any of the three Proposed areas.

Please enter my support of the Continuation of Current Management. Concerning the sagebrush's Resource Management, we feel the land should definitely be left to multiple use.

Thank you.

Signed:

[Signature]

Margene Osmond - 225 Poppy Way, Longmont, CO 80501

Robert E. Vecchio
BLM Team Leader - NW
2505 South Townsend Avenue
Monrovia, California 91011

Dear Mr. Vecchio,

The following are my comments on the Uncompahgre Basin Wilderness Technical Supplement:

I do (do not) agree with the BLM's Proposed action, the No Wilderness Alternative, for the Uncompahgre Basin Wilderness Study Area.

Wilderness Designation—Based on the arguments I have heard and read, I do not find sufficient reason for a change in status of any of the proposed areas.

As long as you own the land and operate in the vicinity of the BLM lands, the idea of establishing public access roads is a real concern. Our experience has shown that an access is created by especially the hunting and wood cutting public as is seen on any of the lands they cross. The BLM should consider a minimum of controls to the individual landowners. As a concept, I oppose access roads unless appropriate controls; in the advent of a decision to create such access, I would hope that they will be selected so as to create a minimum of hardship to landowners.

Thank you for the opportunity to comment on your proposals.

Sincerely,

[Signature]

Harry B. Vaughan
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 21,036 acres of the Gunnison Gorge Wilderness Area for protection. This land is prime wilderness and is tied in with both the River Canyon and Gunnison River which are so important for preservation.

On the Cemel Back area of the Uncompahgre 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 Uncompahgre 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 as 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

---

Dear Mr. Vechta,

The following are my comments on the Uncompahgre basin wilderness remnant supplement:

I do agree with the BLM’s Proposed Action, the All Wilderness Alternative, for the Uncompahgre Gorge Wilderness Study Area.

The Cemel Back and Adobe Badlands Wilderness Study Areas will benefit most from the No Wilderness Alternative. This alternative best exemplifies the multiple-use management.

The specific objectives can be met through the Allotment Management Plan.

Sincerely,

Laura & Ray Wynfield

---

Mr. Robert G. Vechta,

Bureau of Land Management

2505 South Townsend Avenue

Montrose, Colorado 81401

November 1, 1987

Dear Mr. Vechta,

The personnel in the Monacello office of the BLM have spent considerable time and effort on the Draft EIS for the Uncompahgre Basin Resource Area and I want to commend them for the quality of the report. It is my belief that only a comparatively small number of the citizens of the State of Colorado, most 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 worthwhile endeavor.

Thank the study team for making the right decision on the Cemel Back WMA and the Adobe Badlands WMA, we already have too many of these areas already, and we can spare a hundred acres too little to have real wilderness areas. As far as the Cemel Back is concerned, it is clearly too well advertised to be of any value as a 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 EIS/FEIS, the riparian zones are to be "limited to 35 percent utilization of any forage species and eliminated from March 1 through May 31", for livestock grazing. Why not use the lower elevation stream areas in the spring when livestock use would intensify the willow along the stream banks? Any stream in a desert area is critical from livestock use, the riparian zone will deteriorate. If livestock are excluded from any area, the big game will move out of that same area. The two agencies need to meet each other.

As far as putting a percentage of use on as so-called "key species", I challenge this also. There is no such thing as a "key species", that is just a cliche used by some to make an impression on the laymen. So plant species is more of a key than in any other species. As far as percentage of utilization that 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 one knows what 100 percent vegetation by weight was, or is, in any given area before any grazing occurs.

In the more than 30 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 Uncompahgre Basin Resource Area. If by pseudo management, as BLM does in the 1090/400 Act, we are going to see an equal improvement, then the reduction of livestock use has been to no avail. Why not change and get out of the "production rate" and try something such as the Holistic Resource Management. This is being proven to be advantageous in other areas.
Concerning the endangered species and livestock use, the endangered species have survived more than a century of livestock use and are still here. Maybe these species need livestock or large ungulates in order to propagate, but due to people pressures there will never again be populations of big game animals large enough to take the place of livestock.

While I am not well acquainted with the whole Uncompahgre Basin Resource Area, I am very familiar with the Shiprock Basin area and to a lesser degree with the Hot Springs Canyon. I visited the lower Hot Springs Canyon recently and was impressed with the layered conditions that have taken place in the area over the past eight years. The vegetation cover in both areas has shown great improvement in recent years which proves that the present management is working there. I see no reason to change a plan that is proven to be beneficial. I see no reason for restriction for protection of livestock use in either area.

There are more than 135 permitted livestock owners in the Uncompahgre Basin Resource Area. These users are spending many thousands of dollars of their own money, hoping to improve their public land. Their money is spent and shows their grazing fees, and this shows that these people are the real conservationists. They are doing something to make their area a better place.

I believe that everyone wants the same thing, to improve the present area, and if we all work together there is no telling what can be accomplished. Why have the recreationists pay the public land and why not have the ICW pay a grazing fee?

In closing, let us remind everyone that in this area where the greatest percent of the land area is public land, the numbers depend upon the continued use of these public lands, but in an even greater extent, the wildlife are dependent upon the livestock use and the feed and privacy offered by the private lands.

Sincerely,

Jack Money

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Gene Vecchia
PMP Team Leader
SUNRISE, CECO 2786

DEAR MR. Vecchia,

I WOULD LIKE TO COMMENT ON THE CRAFT OF THE UNCOMPAGHRE BASIN RESOURCE MANAGEMENT PLAN.

I SUPPORT WILDERNESS DESIGNATION FOR THE THREE AREAS COVERED IN THE PLAN. I COMMEND THE PMP FOR RECOMMENDING WILDERNESS FOR 21,000 ACRES OF THE CUMANNIC GROVE WILDLANDS. ALSO FROM THIS AREA CONTAINS A MILE OF THE CUMANNIC RIVER WHICH HAS BEEN RECOMMENDED FOR DESIGNATION AS A WILD RIVER. I WOULD LIKE TO ALSO WELCOME CARL OAK (ROBERTO CAVAZOS) AND ROBBY BALDWIN IN THE CUMANNIC RESOURCE AS COUNCIL FOR WILDERNESS DESIGNATION.

THE DAMAGE BACK LEFT CONTAINS TAILS OF A可愛形cliffe OF THE CUMANNIC GROVE WILDLANDS. AS IT CUT TO THE CUMANNIC GROVE WILDLANDS. THE AREA IS ONE OF THE FEW REMAINING PLACES ALONG THE UNCOMPAGHRE PLATEAU. THE REMAINING PLACES OF PLANTS EXIST IN THE AREA WHICH WILL BENEFIT FROM WILDERNESS DESIGNATION, AS WOULD BIG GAME HERDS.

THE ROCK BALDWIN CONSISTS OF 12,000 ACRES OF MANCO COLOMBIAN WILDLANDS. THE AREA OFFERS SPECTACULAR VIEWS OF THE SAND CROSS MOUNTAIN AND THE UNCOMPAGHRE RIVER VALLEY AND IS MADE TO THE WILDERNESS DESIGNATION. THIS AREA HAS A LOW COMPLEXITY, AND LENSIS...
Robert E. Vecchia
PP Team Leader - BLM
2903 South Towne Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statements:

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.

A few additional comments and concerns are:

- We support the Bureau's position to continue your fact-finding process underway for the forest and development only since you and those involved must analyze all the facts and impacts on a valid decision be made. The Uncompahgre Valley could certainly benefit from the diversity of income generated by this. - But our concerns are the same as others, i.e., is the area in question one, or historically a grazing Allotment?, and will the job of this elk habitat adversely affect the surrounding area, both on public and private lands?

- We also have concerns about off road vehicle use. We support only the Current Management Alternative but there are areas within which need to be under more strict restrictions from this activity. Especially during winter months we prefer, and make mileage more dependent each year.

Throughout the draft are references to introducing desert sheep to the Gant Basin area. As object to this proposal, because:

1. The only reliable water for this area is in the Roubideau and Criswell creeks. Both are designated riparian zone habitats, and it has been suggested that limiting usage in these areas will improve them. Introducing more animal units to directly conflict with the historical use of cattle grazing and the crucial desert winter range is defeating our range management objectives. The revenues derived from the grazing permits for cattle and livestock are hardly on a site-specific basis.

2. As we love it. The Cami Black terrain has defied change for at least over a hundred years of civilization'. And it still demands the same respect and offers the same subjects for appreciation without.

3. We need more water development on the top and benches of Winter Mesa to better manage our entire grazing allotment. There would also be great, long-term benefits from chaining or silviculture and revegetation in the valleys and areas between Winter and 70 Mesa. The road across the top of Winter Mesa is essential for cattle grazing, recreation, and peak hunting. The land is needed for corrals, recreation, and livestock grazing. It is heavily used for the same purpose, and to some extent, for wildlife and habitat.

With these facts in mind, therefore, our preference is the No Wilderness Alternative for the Gant Basin.

Thank you for your consideration of these comments.

Sincerely,

Richard A. Vecchia

[Signature]

Robert E. Vecchia
PP Team Leader - BLM
2903 South Towne Avenue
Montrose, Colorado 81401

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3. We need more water development on the top and benches of Winter Mesa to better manage our entire grazing allotment. There would also be great, long-term benefits from chaining or silviculture and revegetation in the valleys and areas between Winter and 70 Mesa. The road across the top of Winter Mesa is essential for cattle grazing, recreation, and peak hunting. The land is needed for corrals, recreation, and livestock grazing. It is heavily used for the same purpose, and to some extent, for wildlife and habitat.

With these facts in mind, therefore, our preference is the No Wilderness Alternative for the Gant Basin.

Thank you for your consideration of these comments.

Sincerely,

Richard A. Vecchia

[Signature]

Robert E. Vecchia
PP Team Leader - BLM
2903 South Towne Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

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With these facts in mind, therefore, our preference is the No Wilderness Alternative for the Gant Basin.

Thank you for your consideration of these comments.

Sincerely,

Richard A. Vecchia

[Signature]

Robert E. Vecchia
PP Team Leader - BLM
2903 South Towne Avenue
Montrose, Colorado 81401

Dear Mr. Vecchia,

The following are my comments concerning the Uncompahgre Basin Resource Management Plan and Environmental Impact Statements:

The best alternative offered to support the multiple-use objective, with the fewest detriments to livestock grazing, is the 'Continuation of Current Management.'

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With these facts in mind, therefore, our preference is the No Wilderness Alternative for the Gant Basin.

Thank you for your consideration of these comments.

Sincerely,

Richard A. Vecchia

[Signature]
The following are my comments on the Compromise Basin Wilderness Technical Supplement:

I do (do not) agree with the BLM's Proposed Action, the All Wilderness Alternative, for the Gunnison Gorge Wilderness Study Area.

Site-specific objectives can be mitigated through the Allotment Management Plan.

We feel that the land is for everyone's use and that stocks can get along together and a wilderness area grows with out any interference and one could not have the intensive equipment if one didn't want it. It would be like some people's take one of our great traditions for wilderness and please but we do not think that all people should have walk on like we have to see all this beauty.

Sincerely,
John L. Reuten

Mr. Robert Vecchia, BLM [counterpart]
Bureau of Land Management
Thermopolis District Office
555 South Tenth Avenue
Montrose, Colorado 81401

The Defended Alternative of the BLM is inadequate in its attention to the natural resources of the Resource Area. Although I support the Escalante Canyon ACEC and Fairview ACEC, these areas need formal management provisions spelled out in the BLM. Escalante Canyon ACEC should be larger. An intensive concern should be allowed to livestock raising, and should prohibit mining. Management intent with respect to utility corridors, roads, mineral exploration, grazing, and surface occupancy should be specifically listed for each BMA. The special vegetation associations considered sensitive by the Colorado Natural Areas Program should be listed for the entire Resource Area, and if appropriate, additional special management areas should be proposed in the final BLM.

I oppose the proposed North Delta OHV use area as incompatible with management practices. I support the proposal for the Gunnison Gorge OHV for use area. Although this area has not been used, it is adequate for OHV use as part of the Resource Area. Areas of national importance potential on the Gunnison Wilderness Area. I ask that OHV be restricted to existing roads throughout the area. The nonaeraohs-located OHVs provide a specialized habitat for numerous rare plants and plant associations. In short, a plan for the OHV use area would be a serious threat to preserving the natural resources here.

Thank you for considering the Gunnison Gorge OHV for Wilderness protection. I am a wilderness area that, under wilderness designation, will be a valuable supplement to Black Canyon of the Gunnison National Monument.

Yours sincerely,

Robert E. Martin, Ph.D.

Robert E. Vecchia [counterpart]
Bureau of Land Management
555 South Tenth Avenue
Montrose, Colorado 81401

For many years the Multiple Use Act has worked for the preservation of this area. The forest in the area has livestock to help feed the hungry world. At no time have these uses interfered with recreational uses of the lands. This area does not lend itself to livestock. This area has been designated as wilderness. The area is managed as it should be and is accessible to the general public.

I would like to use the area for its multiple uses. Under proper management, these lands will provide us with food and fibre for all time and 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 non called riparian zones would defeat the purpose of a riparian habitat. Many riparian species of vegetation are of low palatability to livestock. Livestock in this area is important and water turbidity will occur in the absence of livestock use.

Many irrigation ditches once used for livestock have been filled by the roads and sandy washes. These streams usually dry up during the summer and when flooding occurs there is no way to control the sandy, rocky dry washes. Some sections are definitely too dry for vegetation and definitely do not lend itself to livestock suitability.

Reduction of OHVs would defeat the purpose of a riparian zone when properly managed. Vegetation and the canyon area has improved. Where once the same riparian habitat was first introduced, then the whole area of riparian habitat properly managed should improve available forage.

Riparian sheep should not be introduced into the area. Lack of adequate winter forage would precipitate this. Prior land in the area would necessarily 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 those natural resources should be utilized thru a practical and beneficial program, not looked up for the exclusive use of killers, back parkers and the affluent few with time on their hands.

The young, too, grow old. They also will be denied access to endless areas in their declining years when they are no longer able to walk or back pack long distances.

The use to which Público the management of all public lands will provide forage for wildlife and livestock, minerals for energy development and protection of watersheds, the most valuable resource of all.

The west has a valid existing right to keep these public lands open for all to use and enjoy. Creating wilderness areas does not guarantee these lands for the enjoyment of future generations. Proper management does.

Josephine M. Gore
164
Delta, Colorado

Gene Vecchia
165
Bureau of Land Management
3 November 1987

Gene Vecchia, RMP Team Leader
Bureau of Land Management
2900 E. Townsend Avenue
Montrose, CO 81401

Dear Mr. Vecchia:

I offer the following comments regarding the Uncompahgre Basin Resource Management Plan and Environmental Impact Statement and Wilderness Guidelines Proposal:

1. The document is generally well-written throughout and without the usual obscurities.

2. BLM's recommendation of wilderness for the Gunnison Gorge is laudable. The gorge is geologically spectacular and offers year-round opportunities for primitive and unconfined recreation.

3. There are no resource conflicts with respect to Camell Back, yet BLM has failed to recommend any of the WSA for wilderness designation. What was this recommendation based?

4. Adobe Basin WSA, as described by BLM on p. 3-11, "Includes the most outstanding Indian rock art 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 compares at .002/acre, and the potential for cultural resources is evaluated as moderate. The cultural resource density within the Camell Back WSA compares at .000/acre, and the potential for cultural resources is evaluated as "low to moderate." Can you explain the justifications for these evaluations and this discrepancy?

6. While a site density of .000/acre may be "low" in some contexts (e.g., southwestern Colorado, it is not "low" in western-central Colorado. For instance, I don't know which 3 percent of the Camell Back WSA has been inventoried, but I am dubious about site-frequency predictions made from such small sample sizes. This area contains three potential rock art sites and is topographically similar to the Dominguez Escalante areas, both of which have proven to be unexpectedly archaeologically sensitive.

7. It is stated on p. 4-67 that "High-value cultural sites on these areas could be protected by special designations" now.

Gene Vecchia
Bureau of Land Management

8. Having almost 50 percent of the resource area open to ORV use is preposterous! Such non-management of these vehicles encourages ecological degradation, soil erosion, and the destruction of archaeological sites.

9. The Durango-Silverton Ski Area is NOT NEEDED—the present group of ski areas can barely make a go of it, so WHY develop another? However, the ski DO NEED their carving grounds, and the dear their snowing areas. No development activity should be allowed during the 5-year grace period proposed by BLM.

Thank you for considering my comments.

Sincerely,

Dana L. Langdon

7 Chardonnay Court
Grand Junction, CO 81503

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 Camell 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 Uncompahgre 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 Hotlands for Wilderness designation. Obviously there are no trees there for the timber industry and the four dry oil and gas well prove the low potential for mineral development. There are no significant conflicts for wilderness designation.

Please manage Storm King Mountain for ski. 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 developments would totally eliminate the elk feeding grounds as well as impact wildlife feeding 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 report, 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 undamaged 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 Berweiler
613 Harbor
Deaver, WY 82219
2832 Unaweep Avenue
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2605 S. Townsend Avenue
Montrose, CO 81401

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.

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?

2. The Storm King Ski Area is unnecessary; Colorado has enough ski areas, most of which are constantly complaining about their financial struggles.

Thank you.

Sincerely,

Bella Connor

2832 Unaweep Avenue
Grand Junction, CO 81503
3 November 1987

Gene Vecchia
RMP Team Leader
Bureau of Land Management
2605 S. Townsend Avenue
Montrose, CO 81401

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.

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. Please explain why the BLM considers the potential for cultural resources in the Camel Back WSA "low to moderate."

3. How would high-value cultural sites be protected by special designations?

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.

Thank you for considering my comments.

Sincerely,

Carl E. Connor
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.

Likewise, 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 perennial stream, Camel Back can provide a remote recreational experience for the backcountry hiker, and wilderness designation would provide protection for fragile ecosystems 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,

Lewis McCool
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

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM’s RESPONSE TO THE COMMENT</th>
</tr>
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<tbody>
<tr>
<td>AIR QUALITY</td>
<td></td>
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<tr>
<td>58</td>
<td>31</td>
<td>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.</td>
</tr>
<tr>
<td>COAL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>16, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>32</td>
<td>16</td>
<td>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.</td>
</tr>
</tbody>
</table>
**RESPONSES TO COMMENTS**

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>33</td>
<td>8, 16, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>34</td>
<td>L-2</td>
<td>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.)</td>
</tr>
<tr>
<td>42</td>
<td>16, 22, H-3, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>45</td>
<td>16, L-21</td>
<td>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 reclaimability, the impacts will be analyzed when a potential coal lease tract is delineated.</td>
</tr>
<tr>
<td>46</td>
<td>16, L-21, M-12</td>
<td>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.</td>
</tr>
<tr>
<td>72</td>
<td>L-21</td>
<td>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.</td>
</tr>
</tbody>
</table>

**OIL AND GAS**

<p>| | |</p>
<table>
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<th></th>
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<tbody>
<tr>
<td>8</td>
<td>17, 32</td>
</tr>
</tbody>
</table>

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.

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<tbody>
<tr>
<td>35</td>
<td>3</td>
</tr>
</tbody>
</table>

The text on page 2-3 of the Draft RMP/EIS has been changed. See the Changes to the Draft RMP/EIS section of this document.

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<tbody>
<tr>
<td>38</td>
<td>2, 9</td>
</tr>
</tbody>
</table>

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.
<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM'S RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>44</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>47</td>
<td>16, 24, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>36</td>
<td>9</td>
<td>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.</td>
</tr>
<tr>
<td>39</td>
<td>2</td>
<td>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.</td>
</tr>
<tr>
<td>41</td>
<td>22</td>
<td>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.</td>
</tr>
<tr>
<td>43</td>
<td>18</td>
<td>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.</td>
</tr>
<tr>
<td>73</td>
<td>8</td>
<td>When reviewing site-specific actions, the BLM will comply with state water quality standards as noted in the introduction to each alternative prescription.</td>
</tr>
<tr>
<td>74</td>
<td>8</td>
<td>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.</td>
</tr>
</tbody>
</table>
### RESPONSES TO COMMENTS

#### Table 3 (continued)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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<th>BLM's RESPONSE TO THE COMMENT</th>
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</thead>
<tbody>
<tr>
<td>75</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>76</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>77</td>
<td>8</td>
<td>“Local surface waters” refers to the water resources within the drainage where the impact is occurring.</td>
</tr>
<tr>
<td>78</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>79</td>
<td>8</td>
<td>Aquatic habitat activity plans would be designed to meet or exceed the water quality standards for each particular area.</td>
</tr>
<tr>
<td>80</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>81</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>82</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>83</td>
<td>9</td>
<td>Watershed protection for the Gunnison River through the Gunnison Gorge is identical in both the Conservation and Preferred alternatives.</td>
</tr>
</tbody>
</table>

### RIPARIAN/AQUATIC SYSTEMS

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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<th>BLM's RESPONSE TO THE COMMENT</th>
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</thead>
<tbody>
<tr>
<td>7</td>
<td>9, H-7</td>
<td>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.</td>
</tr>
<tr>
<td>23</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>RESPONSE NUMBER</td>
<td>COMMENTER OR LETTER NUMBER</td>
<td>BLM's RESPONSE TO THE COMMENT</td>
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<td>------------------------------</td>
</tr>
<tr>
<td>24</td>
<td>8, 9, 23, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>40</td>
<td>20</td>
<td>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.</td>
</tr>
<tr>
<td>97</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>113</td>
<td>30</td>
<td>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.</td>
</tr>
<tr>
<td>114</td>
<td>30</td>
<td>The BLM recognizes that differences exist within and between riparian areas. Specific management objectivities and guidelines would be developed in Allotment Management Plans or other activity plans.</td>
</tr>
<tr>
<td>116</td>
<td>23, 163, 169</td>
<td>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.</td>
</tr>
<tr>
<td>117</td>
<td>161</td>
<td>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.</td>
</tr>
<tr>
<td>118</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>119</td>
<td>9, 16, 23, 163, 169, L-21</td>
<td>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.</td>
</tr>
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</table>
RESPONSES TO COMMENTS

Table 3 (continued)

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>121</td>
<td>11, 12, 30, 148, 152, 156, 161, 164, M-1, M-3, M-5, M-6, M-14, M-15</td>
<td>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.</td>
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THREATENED AND ENDANGERED SPECIES

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<tbody>
<tr>
<td>11</td>
<td>7</td>
<td>Table 2-6 and Table 2-8 have been changed (see the Changes to the Draft RMP/EIS section in this document).</td>
</tr>
<tr>
<td>27</td>
<td>8, 9, 16, 23, 163, 169</td>
<td>The text has been changed; see the prescription for Management Unit 8 in this document.</td>
</tr>
<tr>
<td>99</td>
<td>7</td>
<td>The U.S. Fish and Wildlife Service would be consulted prior to any surface disturbance or the development of any activity plan which may affect listed species or their habitat.</td>
</tr>
<tr>
<td>100</td>
<td>9, 23, 169</td>
<td>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.</td>
</tr>
<tr>
<td>103</td>
<td>9, 23, 163</td>
<td>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. Astragalus wetherillii 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.</td>
</tr>
<tr>
<td>104</td>
<td>9, 16, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>105</td>
<td>M-3</td>
<td>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.</td>
</tr>
<tr>
<td>106</td>
<td>30</td>
<td>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.</td>
</tr>
<tr>
<td>135</td>
<td>23</td>
<td>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.</td>
</tr>
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### Table 3 (continued)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM’s RESPONSE TO THE COMMENT</th>
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</thead>
<tbody>
<tr>
<td><strong>WILDLIFE HABITAT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>L-21</td>
<td>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.</td>
</tr>
<tr>
<td>96</td>
<td>34</td>
<td>The badlands areas are not suitable habitat for bighorn sheep.</td>
</tr>
<tr>
<td>98</td>
<td>156, 161</td>
<td>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.</td>
</tr>
<tr>
<td>107</td>
<td>M-12</td>
<td>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.</td>
</tr>
<tr>
<td>109</td>
<td>9</td>
<td>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.</td>
</tr>
<tr>
<td>110</td>
<td>172</td>
<td>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.</td>
</tr>
<tr>
<td>111</td>
<td>21, 161, 164, M-15</td>
<td>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.</td>
</tr>
<tr>
<td><strong>LIVESTOCK GRAZING</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>30</td>
<td>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.</td>
</tr>
<tr>
<td>70</td>
<td>20, 34, H-6</td>
<td>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</td>
</tr>
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</table>
Table 3 (continued)

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<tr>
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</thead>
<tbody>
<tr>
<td>127</td>
<td>H-2</td>
<td>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.</td>
</tr>
<tr>
<td>128</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>129</td>
<td>129</td>
<td>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.</td>
</tr>
<tr>
<td>131</td>
<td>21</td>
<td>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.</td>
</tr>
<tr>
<td>132</td>
<td>30</td>
<td>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.</td>
</tr>
<tr>
<td>133</td>
<td>30, 156</td>
<td>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.</td>
</tr>
<tr>
<td>134</td>
<td>156, M-6</td>
<td>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.</td>
</tr>
</tbody>
</table>

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)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>59</td>
<td>24</td>
<td>the Gunnison Gorge. All other recreation use is estimated from staff observations and from recreation users' comments.</td>
</tr>
<tr>
<td>65</td>
<td>112, 156, M-2, M-3</td>
<td>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.</td>
</tr>
<tr>
<td>69</td>
<td>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</td>
<td>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.</td>
</tr>
<tr>
<td>120</td>
<td>22</td>
<td>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.</td>
</tr>
</tbody>
</table>

### OFF-ROAD VEHICLES

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>50, H-2</td>
<td>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.</td>
</tr>
<tr>
<td>55</td>
<td>64</td>
<td>The regulations governing ORV use on public lands are contained in 43 CFR 8340.</td>
</tr>
<tr>
<td>67</td>
<td>9, 11, 16, 23, 24, 30, 34, 50, 64, 112, 135, 161, 163, 165, 169, 172, H-2, L-21, M-2, M-13</td>
<td>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.</td>
</tr>
</tbody>
</table>
## RESPONSES TO COMMENTS

Table 3 (continued)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>88</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>137</td>
<td>19, H-7</td>
<td>In the Proposed Plan, the area within the boundary of the Camel Back WSA is recommended for closure to ORV use.</td>
</tr>
</tbody>
</table>

### 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 nonsuitable for wilderness under the Proposed Plan.
<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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</thead>
<tbody>
<tr>
<td>21</td>
<td>L-12</td>
<td>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.</td>
</tr>
<tr>
<td>49</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>51</td>
<td>22</td>
<td>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.</td>
</tr>
<tr>
<td>52</td>
<td>22</td>
<td>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.</td>
</tr>
<tr>
<td>54</td>
<td>10</td>
<td>The text has been changed (see the Changes to the Draft RMP/EIS section in this document).</td>
</tr>
<tr>
<td>56</td>
<td>18</td>
<td>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.</td>
</tr>
<tr>
<td>57</td>
<td>6</td>
<td>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.</td>
</tr>
<tr>
<td>60</td>
<td>22, L-17</td>
<td>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).</td>
</tr>
<tr>
<td>61</td>
<td>31, H-1</td>
<td>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.</td>
</tr>
</tbody>
</table>
### Table 3 (continued)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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</thead>
<tbody>
<tr>
<td>62</td>
<td>46, 47, 73</td>
<td>Wilderness designation and wild and scenic river designation are two separate issues. Both require Congressional action under separate and distinct Acts.</td>
</tr>
<tr>
<td>63</td>
<td>16, 24, L-21</td>
<td>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.</td>
</tr>
<tr>
<td>64</td>
<td>78, 147, M-10</td>
<td>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.</td>
</tr>
<tr>
<td>66</td>
<td>21, 22, 26, 28, 87, 89, 101, 125, 139, 142, 143, 145, 150, 152, H-9</td>
<td>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.</td>
</tr>
<tr>
<td>68</td>
<td>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</td>
<td>All of the WSA's 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. 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. 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.</td>
</tr>
<tr>
<td>71</td>
<td>1, 3, 8, 10, 22, 31, 49, 165, 168</td>
<td>These concerns will be addressed during preparation of the final wilderness EIS.</td>
</tr>
</tbody>
</table>
Table 3 (continued)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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</tr>
</thead>
<tbody>
<tr>
<td>130</td>
<td>19</td>
<td>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.</td>
</tr>
<tr>
<td>136</td>
<td>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</td>
<td>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. 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. 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. 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.</td>
</tr>
</tbody>
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**SPECIAL MANAGEMENT AREAS**

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
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<th>BLM's RESPONSE TO THE COMMENT</th>
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</thead>
<tbody>
<tr>
<td>19</td>
<td>L-21</td>
<td>The BLM feels there is adequate space within Management Unit 14 for a nature trail and other interpretive purposes.</td>
</tr>
<tr>
<td>28</td>
<td>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</td>
<td>The text has been changed; see the management prescriptions (in this document) for Management Units 12, 13, and 15.</td>
</tr>
</tbody>
</table>
RESPONSES TO COMMENTS

Table 3 (continued)

<table>
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<tr>
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<tbody>
<tr>
<td>37</td>
<td>9</td>
<td>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.</td>
</tr>
<tr>
<td>101</td>
<td>8, 24</td>
<td>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.</td>
</tr>
<tr>
<td>102</td>
<td>8, 11, 24</td>
<td>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.</td>
</tr>
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</table>

LAND TENURE ADJUSTMENTS AND LAND USE MANAGEMENT

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
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</thead>
<tbody>
<tr>
<td>16</td>
<td>4</td>
<td>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.</td>
</tr>
<tr>
<td>17</td>
<td>4</td>
<td>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).</td>
</tr>
<tr>
<td>85</td>
<td>7, 9, 16, 22, 24, 40, 135, 172, H-2, L-21, M-12</td>
<td>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.</td>
</tr>
<tr>
<td>87</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>89</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>90</td>
<td>1</td>
<td>The text has been changed to include all public entry laws. See the Changes to the Draft RMP/EIS section of this document.</td>
</tr>
<tr>
<td>91</td>
<td>1</td>
<td>Current laws and regulations do not permit the transfer of BLM powersite reserves to the Bureau of Reclamation. Under the Proposed Plan, the powersite...</td>
</tr>
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Table 3 (continued)

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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>classifications in the Dominguez area would be lifted to allow a full range of multiple-use management.</td>
</tr>
<tr>
<td>92</td>
<td>1</td>
<td>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.</td>
</tr>
<tr>
<td>93</td>
<td>1</td>
<td>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.</td>
</tr>
</tbody>
</table>

**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)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>48</td>
<td>H-2</td>
<td>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.</td>
</tr>
<tr>
<td>84</td>
<td>22</td>
<td>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.</td>
</tr>
</tbody>
</table>

### 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)

<table>
<thead>
<tr>
<th>RESPONSE NUMBER</th>
<th>COMMENTER OR LETTER NUMBER</th>
<th>BLM's RESPONSE TO THE COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>H-13</td>
<td>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.</td>
</tr>
<tr>
<td>15</td>
<td>5</td>
<td>The boundary of Management Unit D-15 is the Cimarron River; the unit is not adjacent to High Mesa.</td>
</tr>
<tr>
<td>22</td>
<td>16, L-21, M-12</td>
<td>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.</td>
</tr>
<tr>
<td>25</td>
<td>8</td>
<td>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.</td>
</tr>
<tr>
<td>86</td>
<td>27, 28, 79, 82, 84, 86, 88, 93, 100, 111, 124, 134, 140, 141, 144, 146, 148, 151, 154, 159, 161,</td>
<td>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.</td>
</tr>
<tr>
<td>108</td>
<td>5</td>
<td>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.</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>LOCATION OF CHANGE</th>
<th>CHANGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 1-1; Topics Not Addressed in this Plan</td>
<td>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.)</td>
</tr>
<tr>
<td>Page 2-3; Oil, Gas and Geothermal Resources, second paragraph</td>
<td>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.</td>
</tr>
<tr>
<td>Page 2-10; Table 2-6</td>
<td>Add the following entry: (Common Name) Wetherill milkvetch; (Scientific Name) <em>Astragalus wetherillii</em>; (Status) BLM Sensitive; (Habitat) Clay hills in association with pinyon-juniper and sagebrush; (Estimated Population) Unknown; (Estimated Acres of Habitat) Unknown.</td>
</tr>
<tr>
<td>Page 2-10; Table 2-6</td>
<td>Change the habitat description for Spineless hedgehog cactus to read: Rocky soils. Change the habitat description for Uinta Basin hookless cactus to read: Gravely 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.</td>
</tr>
<tr>
<td>Page 2-12; Table 2-8</td>
<td>Change the status for the river otter to read: State endangered and federal candidate.</td>
</tr>
<tr>
<td>Page 2-19; Table 2-16</td>
<td>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.</td>
</tr>
<tr>
<td>Page 2-20; Gunnison Gorge WSA</td>
<td>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.</td>
</tr>
<tr>
<td>Page 2-21; Withdrawals; first paragraph</td>
<td>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.</td>
</tr>
<tr>
<td>LOCATION OF CHANGE</td>
<td>CHANGE</td>
</tr>
<tr>
<td>--------------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Page 2-21; Withdrawals; second paragraph</td>
<td>Change the second and third sentences to read: These withdrawals segregate the affected lands from all public entry laws, including the general mining laws.</td>
</tr>
<tr>
<td>Page 2-21; Withdrawals; third paragraph</td>
<td>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.</td>
</tr>
<tr>
<td>Page 2-22; Table 2-17</td>
<td>Change the title of column four from Purpose to Primary Purpose.</td>
</tr>
<tr>
<td>Page 3-18; Management Unit C-1; Locatable Minerals</td>
<td>Remove the word pre-FLPMA.</td>
</tr>
<tr>
<td>Page 3-25; Management Unit C-15: Special Land Uses</td>
<td>Delete this entire paragraph.</td>
</tr>
</tbody>
</table>
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 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


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 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 native or naturalized fish and wildlife species (excluding federal or state listed endangered, threatened, or candidate species) could be authorized following environmental analysis and consultation with the USFWS, the Colorado Division of Wildlife (DOW), and other affected parties.

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 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.

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

<table>
<thead>
<tr>
<th>MANAGEMENT UNIT</th>
<th>ACRES OF PUBLIC SURFACE</th>
<th>PERCENTAGE (^1) OF THE PLANNING AREA</th>
<th>IMPORTANT RESOURCES, VALUES, OR LAND USES</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>186,810</td>
<td>39%</td>
<td>Livestock grazing, wildlife habitat, recreation, woodlands</td>
</tr>
<tr>
<td>2</td>
<td>67,320</td>
<td>14%</td>
<td>Wildlife habitat, coal, woodlands</td>
</tr>
<tr>
<td>3</td>
<td>47,607</td>
<td>10%</td>
<td>Woodlands, wildlife habitat, livestock grazing</td>
</tr>
<tr>
<td>4</td>
<td>40,792</td>
<td>8%</td>
<td>Recreation, soils, woodlands</td>
</tr>
<tr>
<td>5</td>
<td>24,177</td>
<td>5%</td>
<td>Soils, recreation, oil and gas</td>
</tr>
<tr>
<td>6</td>
<td>21,038</td>
<td>4%</td>
<td>Wilderness, recreation, T&amp;E species</td>
</tr>
<tr>
<td>7</td>
<td>17,232</td>
<td>4%</td>
<td>Coal, wildlife habitat</td>
</tr>
<tr>
<td>8</td>
<td>8,942</td>
<td>2%</td>
<td>Recreation, soils</td>
</tr>
<tr>
<td>9</td>
<td>6,320</td>
<td>1%</td>
<td>Riparian/aquatic habitat, livestock grazing</td>
</tr>
<tr>
<td>10</td>
<td>3,292</td>
<td>Less than 1%</td>
<td>Wildlife habitat, coal, recreation, commercial timber</td>
</tr>
<tr>
<td>11</td>
<td>1,990</td>
<td>Less than 1%</td>
<td>Wildlife habitat, recreation</td>
</tr>
<tr>
<td>12</td>
<td>1,895</td>
<td>Less than 1%</td>
<td>Recreation, T&amp;E species</td>
</tr>
<tr>
<td>13</td>
<td>377</td>
<td>Less than 1%</td>
<td>T&amp;E species, soils</td>
</tr>
<tr>
<td>14</td>
<td>80</td>
<td>Less than 1%</td>
<td>Recreation, scientific values</td>
</tr>
<tr>
<td>15</td>
<td>6,783</td>
<td>1%</td>
<td>T&amp;E species, scenic values, soils</td>
</tr>
<tr>
<td>16</td>
<td>48,422</td>
<td>10%</td>
<td>General land uses</td>
</tr>
</tbody>
</table>

\(^1\) Percentages are rounded to whole numbers.
PROPOSED PLAN

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 threatened species 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 totaling 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 powersite 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 Dominguez 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
PROPOSED PLAN

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 in 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). Variance 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 (PLO 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 (RAMP), 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

<table>
<thead>
<tr>
<th>RANGE SITE</th>
<th>LOCATION</th>
<th>PERCENT BASAL GROUND COVER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stony saltdesert</td>
<td>North of Delta</td>
<td>10</td>
</tr>
<tr>
<td>Clayey saltdesert</td>
<td>South of Hotchkiss</td>
<td>10</td>
</tr>
<tr>
<td>Salt flats</td>
<td>South of Hotchkiss</td>
<td>7</td>
</tr>
<tr>
<td>Clayey saltdesert</td>
<td>Bone Mesa</td>
<td>10</td>
</tr>
</tbody>
</table>

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 bighorn sheep and continent 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 of deer and elk winter range would be managed with the cooperation of the Colorado DOW. Supplemental releases of bighorn sheep would be permissible as identified in the 1986 reintroduction plan or its future amendments.

**Livestock Grazing.** Livestock grazing and facility maintenance would be managed on a 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 tri 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 very 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 IPCC 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 tree 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 are 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 use 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 manage-
ment, 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 manage-
ment of the area would be acquired through exchange only.

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 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, 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.

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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 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 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.
PROPOSED PLAN

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 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 as a 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
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.
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>
<thead>
<tr>
<th>RESOURCE/RESOURCE USE</th>
<th>GENERAL GUIDANCE</th>
<th>Continuation of Current Management Alternative</th>
<th>Production Alternative</th>
<th>Conservation Alternative</th>
<th>Proposed Plan</th>
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<tbody>
<tr>
<td>COAL</td>
<td>Allow coal develop-ment on all areas not excluded from leasing. Consider coal leasing on a demand basis; apply unsuitability criteria and resource screening.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>OIL, GAS, AND GEOOTHERMAL RESOURCES</td>
<td>Allow development of oil, gas, and geothermal resources on all areas not excluded from leasing.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
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<td>RESOURCE/RESOURCE USE</td>
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<tr>
<td>LOCATABLE MINERALS</td>
<td>Allow development of locatable minerals on all areas not closed to mineral entry and location.</td>
<td>Allow mineral entry and location on 615,892 acres. Current withdrawals totaling 59,250 acres are closed to entry and location.</td>
<td>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).</td>
<td>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).</td>
<td>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).</td>
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<tr>
<td>MINERAL MATERIALS</td>
<td>Allow disposal of mineral materials on all areas not excluded or withdrawn.</td>
<td>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.</td>
<td>Allow disposal of mineral materials on 396,246 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.</td>
<td>Allow disposal of mineral materials on 444,532 acres with federal mineral estate. Disposal on 65,174 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.</td>
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<td>SOILS AND WATER RESOURCES</td>
<td>Establish water quality studies throughout the planning area.</td>
<td>Continue intensive management and development of the Elephant Skin Wash watershed (2,370 acres) to control salinity.</td>
<td>No public lands would be intensively managed for salinity and/or erosion control.</td>
<td>Public lands totaling 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.</td>
<td>Public lands totaling 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.</td>
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<tr>
<td>Continuation of Current Management Alternative</td>
<td>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.</td>
<td>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.</td>
<td>Projects would be developed to control salinity on 29,978 acres and erosion on 21,703 acres if compatible with recreation, T&amp;E species, and cultural resource management.</td>
<td>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.</td>
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<td>Production Alternative</td>
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<td>RIPARIAN ZONES</td>
<td>Continue to inventory and monitor riparian areas.</td>
<td>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.</td>
<td>Maintain riparian zones in the planning area in their present condition so long as it does not interfere with other resource uses and needs.</td>
<td>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.</td>
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<td>Threatened and Endangered Species</td>
<td>Continue to inventory and monitor T&amp;E plant and animal habitats. Continue T&amp;E clearances and Section 7 consultations with the USFWS.</td>
<td>Require measures to protect T&amp;E species, individuals, and habitats in plans for all surface disturbing activities.</td>
<td>Require minimal measures to protect T&amp;E species, individuals, and habitats in plans for all surface disturbing activities.</td>
<td>Require additional measures beyond minimal requirements to protect T&amp;E species, individuals, and habitats in plans for all surface disturbing activities.</td>
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<tr>
<td>Maintain suitable habitat for bald eagles and river otters in the Gunnison Gorge area.</td>
<td>Require measures to protect T&amp;E species, individuals, and habitats in plans for all surface disturbing activities.</td>
<td>Maintain suitable habitat for bald eagles, peregrine falcons, and river otters in the Gunnison Gorge area.</td>
<td>Maintain suitable habitat for bald eagles and river otters in the Gunnison Gorge area.</td>
<td>Maintain suitable habitat for bald eagles, peregrine falcons, and river otters in the Gunnison Gorge area.</td>
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<tr>
<td>WILDLIFE HABITAT</td>
<td>Monitoring of both terrestrial and aquatic wildlife habitat would continue.</td>
<td>Maintain big game forage allocations at present levels; future increases/decreases would be divided evenly between big game and livestock.</td>
<td>Maintain big game forage allocations at present levels; no future additional forage would be allocated to big game.</td>
<td>Designate one ACEC and one RNA/ACEC, totaling 2,272 acres, for protection of T&amp;E plants and unique plant associations.</td>
<td>Designate one ACEC, one RNA/ACEC, and one ONA/ACEC, totaling 9,055 acres for protection of T&amp;E plants, unique plant associations, and identification of recreational hazards.</td>
</tr>
</tbody>
</table>

- Protect and mitigate wildlife habitat and improve browse condition on crucial deer and elk ranges.
- 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.
- 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.
- 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)

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<tr>
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<tr>
<td>LIVESTOCK GRAZING</td>
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<td>Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area.</td>
<td>Continue cooperative management effort with the DOW to benefit deer and elk in the Billy Creek area.</td>
<td>Manage habitat in the Gunnison Gorge and Camel Back areas for bighorn sheep.</td>
<td>Manage habitat and minimize disturbance in the Gunnison Gorge and Camel Back areas for bighorn sheep.</td>
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<td>Manage habitat in the Gunnison Gorge for 150 bighorn sheep.</td>
<td>Manage habitat in the Gunnison Gorge for 150 bighorn sheep. Allow reintroduction of bighorn sheep into the Camel Back area so long as livestock forage needs are not impacted.</td>
<td>Allocate forage, minimize disturbance, and manage habitat in the Gunnison Gorge and Camel Back areas for bighorn sheep.</td>
<td>Intensively manage and improve 1,990 acres along the Gunnison River for waterfowl habitat.</td>
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<td>Revise the Gunnison Forks HMP to restrict ORV and other recreation use, and to accommodate livestock grazing and oil and gas activities.</td>
<td>Revise the Gunnison Forks HMP to restrict ORV and other recreation use, and to accommodate livestock grazing and oil and gas activities.</td>
<td>Continue management of the Gunnison Forks HMP area for fisheries and wildlife habitat benefits.</td>
<td>Intensively manage 70 miles of streams for restoration and protection of aquatic habitats.</td>
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<td>Intensively manage and improve 1,990 acres along the Gunnison River for waterfowl habitat.</td>
<td>Intensively manage and improve 1,990 acres along the Gunnison River for waterfowl habitat.</td>
<td>Allow intensive management on 353,068 acres of &quot;I&quot; allotments; maintain current conditions on 65,497 acres of &quot;M&quot; allotments; manage 38,900 acres as &quot;C&quot; allotments. (includes suitable existing unallotted areas). Manage 5,817 acres as unallotted areas.</td>
<td>Allow intensive management on 336,562 acres of &quot;I&quot; allotments; maintain current conditions on 74,817 acres of &quot;M&quot; allotments; manage 39,033 acres as &quot;C&quot; 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.</td>
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<td>Develop AMPs for &quot;I&quot; category grazing allotments if no plan exists. Maintain existing AMPs on &quot;M&quot; &quot;C&quot; allotments. Continue monitoring on all allotments, with emphasis on &quot;I&quot; allotments.</td>
<td>Develop AMPs for &quot;I&quot; category grazing allotments if no plan exists. Maintain existing AMPs on &quot;M&quot; &quot;C&quot; allotments. Continue monitoring on all allotments, with emphasis on &quot;I&quot; allotments.</td>
<td>Allow intensive management on 353,068 acres of &quot;I&quot; allotments; maintain current conditions on 65,497 acres of &quot;M&quot; allotments; manage 38,900 acres as &quot;C&quot; allotments. Manage 5,817 acres as unallotted areas.</td>
<td>Allow intensive management on 350,796 acres of &quot;I&quot; allotments; maintain current conditions on 65,497 acres of &quot;M&quot; allotments; manage 38,433 acres as &quot;C&quot; allotments. Manage 38,351 acres as unallotted areas.</td>
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<td><strong>FORESTRY</strong></td>
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<td>Manage both commercial forest and suitable woodlands for sustained yield production with harvest restrictions determined</td>
<td>Commercial forest on 3,487 acres (257 MBF/year) and suitable woodlands on 6,536 acres (327 cords/year) would be managed for sustained yield production</td>
<td>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 production</td>
<td>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 production</td>
</tr>
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Continuation of Current Management Alternative

- Manage at present forage allocation levels; future forage increases would be divided evenly between livestock and big game.

Production Alternative

- Manage at present forage allocation levels; future forage increases would be allocated to livestock.

Conservation Alternative

- Manage for no additional forage allocations to livestock.

Proposed Plan

- 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 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.

Commercial forest on 3,487 acres (257 MBF/year) and suitable woodlands on 6,536 acres (327 cords/year) would be managed for sustained yield production.

- 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 production.

- 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 production.
<table>
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<td>Recreation</td>
<td>Manage the Gunnison Gorge SRMA in accordance with its RAMP. Continue to manage the Needle Rock ONA/ACEC and develop a management plan.</td>
<td>Continue management of the Gunnison Gorge recreation area (61,067 acres) for motorized and non-motorized recreation opportunities.</td>
<td>Manage the inner Gunnison Gorge (21,038 acres) for intensive recreation use.</td>
<td>Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities.</td>
<td>Manage the Gunnison Gorge recreation area (40,792 acres) for motorized and non-motorized recreation opportunities.</td>
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<td>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.</td>
<td>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).</td>
<td>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).</td>
<td>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.</td>
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<td>Manage the remainder of the planning area for extensive recreation use.</td>
<td>Manage the lower Gunnison River, below Escalante Bridge, as an SRMA and develop river access.</td>
<td>Manage the lower Gunnison River, below Escalante Bridge, as an SRMA for boating opportunities.</td>
<td>Manage the lower Gunnison River, below Escalante Bridge, for boating opportunities. Develop river access and provide maps and information.</td>
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<td>Manage the remainder of the planning area for extensive recreation use.</td>
<td>Restrict recreation use to primitive walk-in access in the Escalante Canyon RNA/ACEC.</td>
<td>Manage and develop the Escalante Canyon ACEC for recreation use that does not conflict with T&amp;E plants and unique plant associations. Manage the</td>
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### Table 7 (continued)

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<tr>
<th>RESOURCE/RESOURCE USE</th>
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<td>Continuation of Current Management Alternative</td>
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<td>Management Alternative</td>
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<td>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.</td>
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<tr>
<td>OFF-ROAD VEHICLES</td>
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<td>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.</td>
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<tr>
<td>CULTURAL RESOURCES</td>
<td>Continue to inventory and monitor cultural resource sites; require clearances for all surface disturbing activities.</td>
<td>Perform necessary-stabilization, restoration, and interpretation of sites in the Gunnison Gorge Recreation Area.</td>
</tr>
</tbody>
</table>
### Table 7 (continued)

<table>
<thead>
<tr>
<th>RESOURCE/RESOURCE USE</th>
<th>GENERAL GUIDANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>VISUAL RESOURCES</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Visual resource management would be:</td>
</tr>
<tr>
<td></td>
<td>Class I - 80 acres,</td>
</tr>
<tr>
<td></td>
<td>Class II - 64,800 acres,</td>
</tr>
<tr>
<td></td>
<td>Class III - 46,580 acres,</td>
</tr>
<tr>
<td></td>
<td>Class IV - 371,617 acres.</td>
</tr>
<tr>
<td></td>
<td>Visual resource management would be:</td>
</tr>
<tr>
<td></td>
<td>Class I - 43,807 acres,</td>
</tr>
<tr>
<td></td>
<td>Class II - 47,852 acres,</td>
</tr>
<tr>
<td></td>
<td>Class III - 37,355 acres,</td>
</tr>
<tr>
<td></td>
<td>Class IV - 354,063 acres.</td>
</tr>
</tbody>
</table>

| **WILDERNESS**        |                  |
|                       | Recommend all three WSAs (41,865 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. |

|                       | Recommend all three WSAs (41,865 acres) as non-suitable for wilderness designation. |
|                       | 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. |

|                       | 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 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). |
### Table 7 (continued)

<table>
<thead>
<tr>
<th>RESOURCE/RESOURCE USE</th>
<th>GENERAL GUIDANCE</th>
<th>Continuation of Current Management Alternative</th>
<th>Production Alternative</th>
<th>Conservation Alternative</th>
<th>Proposed Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MAJOR UTILITIES</strong></td>
<td></td>
<td>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.</td>
<td>Public lands on 449,597 acres would be open to development of major utilities; 33,480 acres would be excluded from utility development.</td>
<td>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.</td>
<td>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.</td>
</tr>
</tbody>
</table>

**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.

<table>
<thead>
<tr>
<th>LAND TENURE ADJUSTMENT</th>
<th>Continuation of Current Management Alternative</th>
<th>Production Alternative</th>
<th>Conservation Alternative</th>
<th>Proposed Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Consider 19 tracts of public land totalling 830.25 acres as suitable for disposal.</td>
<td>Consider 171 tracts of public land totalling 29,496 acres as suitable for disposal.</td>
<td>Consider no public lands as suitable for disposal.</td>
<td>Consider 143 tracts of public land totalling 11,026 acres as suitable for disposal.</td>
</tr>
<tr>
<td></td>
<td>Pursue acquisition of 2,200 acres of private land in the Gunnison Gorge Recreation Area.</td>
<td>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 Routtneau Creek confluence in proposed waterfowl areas.</td>
<td>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.</td>
<td>Pursue acquisition, primarily through exchange, of private lands which meet established criteria and enhance resource management within management units.</td>
</tr>
</tbody>
</table>

**ACCESS**

Acquire public road access into 14 areas and public trail access into one area.

<table>
<thead>
<tr>
<th>ACCESS</th>
<th>Continuation of Current Management Alternative</th>
<th>Production Alternative</th>
<th>Conservation Alternative</th>
<th>Proposed Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Acquire public road access into 13 areas.</td>
<td>Acquire public road access into 7 areas.</td>
<td>Acquire public road access into 15 areas and public trail access into one area.</td>
<td></td>
</tr>
</tbody>
</table>
### Table 7 (continued)

<table>
<thead>
<tr>
<th>RESOURCE/RESOURCE USE</th>
<th>GENERAL GUIDANCE</th>
<th>Continuation of Current Management Alternative</th>
<th>Production Alternative</th>
<th>Conservation Alternative</th>
<th>Proposed Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>FIRE MANAGEMENT</td>
<td>All public lands in the planning area (483,077 acres) would have full and immediate fire suppression, with safety and cost-effectiveness considerations.</td>
<td>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.</td>
<td>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.</td>
<td>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.</td>
<td></td>
</tr>
</tbody>
</table>
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 inconveniences 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, 4,296 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 9,872 acres with 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

<table>
<thead>
<tr>
<th>LEASE CATEGORY</th>
<th>ACRES</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO LEASING</td>
<td></td>
</tr>
<tr>
<td>Federal Surface</td>
<td>21,038</td>
</tr>
<tr>
<td>STANDARD LEASE TERMS</td>
<td></td>
</tr>
<tr>
<td>Federal Surface</td>
<td>276,828</td>
</tr>
<tr>
<td>Split-Estate</td>
<td>207,521</td>
</tr>
<tr>
<td>LEASING WITH STIPULATIONS</td>
<td></td>
</tr>
<tr>
<td>No Surface Occupancy (NSO)</td>
<td></td>
</tr>
<tr>
<td>Federal surface</td>
<td>9,315</td>
</tr>
<tr>
<td>Seasonal</td>
<td></td>
</tr>
<tr>
<td>Federal surface</td>
<td>176,076</td>
</tr>
<tr>
<td>Split-estate</td>
<td>16,136</td>
</tr>
</tbody>
</table>
## Table 9

**MANAGEMENT OF OIL AND GAS LEASES BY MANAGEMENT UNIT: PROPOSED PLAN**

<table>
<thead>
<tr>
<th>MANAGEMENT UNIT</th>
<th>ACRES WITH STANDARD LEASE TERMS</th>
<th>ACRES WITH SEASONAL STIPULATIONS</th>
<th>ACRES WITH NO SURFACE OCCUPANCY STIPULATIONS</th>
<th>ACRES CLOSED TO LEASING</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>118,238</td>
<td>20,897</td>
<td>68,572</td>
<td>623</td>
</tr>
<tr>
<td>2</td>
<td>30,313</td>
<td>13,645</td>
<td>37,007</td>
<td>8,850</td>
</tr>
<tr>
<td>3</td>
<td>19,055</td>
<td>67</td>
<td>28,552</td>
<td>25</td>
</tr>
<tr>
<td>4</td>
<td>32,715</td>
<td>970</td>
<td>8,077</td>
<td>280</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>13,865</td>
<td>28,515</td>
<td>3,367</td>
<td>630</td>
</tr>
<tr>
<td>8</td>
<td>8,942</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>6,320</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
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<td>11</td>
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<td>14</td>
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<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>47,380</td>
<td>143,427</td>
<td>1,042</td>
<td></td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td>276,828</td>
<td>207,521</td>
<td>146,617</td>
<td>10,408</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>RESOURCE REQUIRING PROTECTIVE</th>
<th>ACRES WITHDRAWN</th>
</tr>
</thead>
<tbody>
<tr>
<td>THREATENED AND ENDANGERED SPECIES</td>
<td></td>
</tr>
<tr>
<td>Escalante Canyon ACEC</td>
<td>1,895</td>
</tr>
<tr>
<td>Fairview RNA/ACEC</td>
<td>377</td>
</tr>
<tr>
<td>RECREATION</td>
<td></td>
</tr>
<tr>
<td>Needle Rock ONA/ACEC</td>
<td>80</td>
</tr>
<tr>
<td>WILDERNESS</td>
<td></td>
</tr>
<tr>
<td>Gunnison Gorge WSA</td>
<td>21,038</td>
</tr>
<tr>
<td>OTHER</td>
<td></td>
</tr>
<tr>
<td>Bureau of Reclamation withdrawals</td>
<td>9,360</td>
</tr>
<tr>
<td>TOTAL</td>
<td>32,750</td>
</tr>
</tbody>
</table>

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.
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:**

<table>
<thead>
<tr>
<th>RESOURCE REQUIRING PROTECTIVE CATEGORY</th>
<th>ACRES WITH SEASONAL RESTRICTIONS</th>
<th>ACRES CLOSED</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>12/1  3/1  3/15</td>
<td></td>
</tr>
<tr>
<td></td>
<td>to     to      to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>4/30   5/31     6/30</td>
<td></td>
</tr>
<tr>
<td><strong>Federal surface with no restrictions required</strong></td>
<td>381,358</td>
<td></td>
</tr>
<tr>
<td><strong>SALINITY AREAS</strong></td>
<td>—      —   24,177  —</td>
<td></td>
</tr>
<tr>
<td><strong>RIPARIAN/AQUATIC AREAS</strong></td>
<td>—      —   —        —</td>
<td>6,320</td>
</tr>
<tr>
<td><strong>T&amp;E SPECIES</strong></td>
<td>—      —   —        —</td>
<td>1,895</td>
</tr>
<tr>
<td>Escalante Canyon ACEC</td>
<td>—      —   —        —</td>
<td>377</td>
</tr>
<tr>
<td>Fairview RNA/ACEC</td>
<td>—      —   —        —</td>
<td></td>
</tr>
<tr>
<td><strong>WILDLIFE HABITAT</strong></td>
<td>—      —   37,007  —</td>
<td></td>
</tr>
<tr>
<td>Deer/elk winter range</td>
<td>—      —   —        —</td>
<td></td>
</tr>
<tr>
<td>Waterfowl area</td>
<td>—      —   —        —</td>
<td>1,990</td>
</tr>
<tr>
<td><strong>RECREATION</strong></td>
<td>—      —   —        —</td>
<td>80</td>
</tr>
<tr>
<td>Needle Rock ONA/ACEC</td>
<td>—      —   —        —</td>
<td>6,783</td>
</tr>
<tr>
<td>Adobe Badlands ONA/ACEC</td>
<td>—      —   —        —</td>
<td></td>
</tr>
<tr>
<td><strong>WILDERNESS</strong></td>
<td>—      —   —        —</td>
<td>21,038</td>
</tr>
<tr>
<td>Gunnison Gorge WSA</td>
<td>—      —   —        —</td>
<td></td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td>381,358 37,007 24,177 1,990</td>
<td>36,493</td>
</tr>
</tbody>
</table>

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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 could 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 444,322 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 materials 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 form 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.
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 chaining 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
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 Fire Management. Planned and natural prescribed burning on 169,930 acres would allow for increased sediment loads due to construction and maintenance activities. 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.
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 Development. 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. Eliminating vehicle use to designated roads and trails would eliminate rutting and soil compaction.

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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PROPOSED PLAN IMPACTS

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.

Big horn 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 Roubideau 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 reproduction may result in 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 dislocated 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,
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-critical 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.

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**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 "I" 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
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.

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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 fromLivestock Grazing 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 protect high quality 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...
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. Vandalism 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

<table>
<thead>
<tr>
<th>VRM CLASS</th>
<th>ACRES</th>
<th>PERCENTAGE OF PLANNING AREA</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>27,901</td>
<td>6</td>
</tr>
<tr>
<td>II</td>
<td>27,384</td>
<td>6</td>
</tr>
<tr>
<td>III</td>
<td>293,417</td>
<td>90</td>
</tr>
<tr>
<td>IV</td>
<td>134,375</td>
<td>28</td>
</tr>
<tr>
<td>TOTALS</td>
<td>483,077</td>
<td>100</td>
</tr>
</tbody>
</table>

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.

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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

MANAGEMENT OF PUBLIC LANDS FOR MAJOR UTILITY DEVELOPMENT:
PROPOSED PLAN

<table>
<thead>
<tr>
<th>MANAGEMENT CLASSIFICATION FOR DEVELOPMENT OF MAJOR UTILITIES</th>
<th>ACRES OF PUBLIC LAND</th>
<th>TOTALS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Identified as needed</td>
<td>Identified as not needed</td>
</tr>
<tr>
<td></td>
<td>for major utility development</td>
<td>for major utility development</td>
</tr>
<tr>
<td>Open</td>
<td>98,612</td>
<td>202,394</td>
</tr>
<tr>
<td>Sensitive</td>
<td>934</td>
<td>5,762</td>
</tr>
<tr>
<td>Seasonally closed</td>
<td>22,739</td>
<td>70,598</td>
</tr>
<tr>
<td>Closed</td>
<td>3,511</td>
<td>78,527</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td>125,796</td>
<td>357,281</td>
</tr>
</tbody>
</table>

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

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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ROBERT P. VLAHOS
Technical Coordinator, Uncompahgre Basin RMP Team

W. MAX WITKIND
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

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. Variances 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.
ACRONYMS

ACEC: Area of Critical Environmental Concern
AMP: Allotment Management Plan
APD: Application for Permit to Drill
AUM: Animal Unit Month
BLM: Bureau of Land Management
BOR: Bureau of Reclamation
CFR: Code of Federal Regulations
DOW: Colorado Division of Wildlife
EA: Environmental Assessment
EIS: Environmental Impact Statement
EO: Executive Order
EPA: Environmental Protection Agency
FERC: Federal Energy Regulatory Commission
FLPMA: Federal Land Policy and Management Act
FMP: Forest Management Plan
HMP: Habitat Management Plan
KGS: Known Geologic Structure
kv: kilovolt
MBF: Thousand Board Feet
MSA: Management Situation Analysis
NPS: National Park Service
ONA: Outstanding Natural Area
ORV: Off-Road Vehicle
PLO: Public Land Order
PSD: Prevention of Significant Deterioration
RAMP: Recreation Area Management Plan
R&PP: Recreation and Public Purposes Act
RMP: Resource Management Plan
RNA: Research Natural Area
ROD: Record of Decision
RPS: Rangeland Program Summary
RS: Revised Statutes
SRMA: Special Recreation Management Area
T&E: Threatened and Endangered
TPCC: Timber Production Capabilities Classification
UBRA: Uncompahgre Basin Resource Area
USDl: U.S. Department of the Interior
USFS: U.S. Forest Service
USFWS: U.S. Fish and Wildlife Service
USGS: U.S. Geological Survey
VRM: Visual Resource Management
WSA: Wilderness Study Area
WTS: Wilderness Technical Supplement