

May 8, 2015

Director (21 0)
Attn: Protest Director
P.O. Box 71383
Washington DC 20024-1383

Enclosed are the 2013 Draft RMP Route Designation Factsheet and the 2015 Proposed RMP Route Designation Factsheets. Some of the designations changed from the Draft to the Proposal. Some of the new 2015 Proposal designations are not defined. It would be a process error to present facts to the public in one fashion and then have a decision inconsistent with what was presented to the public.

Examples:

1. County Roads in draft were presented as 510 miles, in the PRMP, they have been reduced to 307.8 miles? The BLM has no authority over County Roads. What happened to the other 202.2 miles of County Roads? What happened to the Vested Interest County Roads the BLM said they would not close?
2. In the Proposal the BLM added a new designation – Open (in open areas), not only is there no definition in the report regarding this new term but DRMP says for routes in OHV areas “no designation is necessary”? This designation violates that rule. It’s an OHV area.
3. The draft and proposal route designations failed to define the impacts to motorized recreation in all phases of the RMP. The BLM continues to claim that they are only closing 852 miles of routes. However the impacts to motorized recreation are far greater. For those of us using a jeep, the route closures will be in excess of 2000 miles of currently open motorized routes to vehicles. Keep in mind Zone L has 545 miles of routes that have been deferred?
4. The PRMP has 334.7 miles of routes that are newly claimed “NO LEGAL ACCESS”. This definition was not in the Draft nor is it defined. All these routes are blue (admin) routes on the Proposed Travel Management Maps. The BLM is calling administrative routes something else in the PRMP? This is a process error and is deceiving to the public.
5. The BLM has removed the State/US Highways from the PRMP. Why not remove the County Roads as well? The County Roads should not be included in the “Total Open Motorized”. These routes are outside the jurisdiction of the BLM and should not be presented as if the BLM is allowing them to stay open to the public.
6. The BLM has no jurisdiction over routes built prior to Oct 21, 1976 if the route matches the definition of a public highway based on state law. This is a violation of Section 509 and 701 in FLPMA.

Respectfully,

Grand Junction, CO

Interest- legal rights, family heritage, economic impacts of GJ RMP on residents of Mesa County, CO

BLM's claim 2,375 Miles are "open",
 Note: Zone L (North Desert) could have hundreds of miles of additional closure, that zone is delayed.

Note: Must Remove County Roads, the BLM has no authority over them.

Note: Don't forget we now have 234 Miles of seasonal closure

Table 2. Route Designations in Miles by Alternative

Designation	Alt. A	Alt. B - Proposed	Alt. B - Proposed % of total	Alt. B - Proposed following mitigation	Alt. B - Proposed following mitigation % of total	Alt. C	Alt. D
Limited to under 50" only	13.1	37.2	0.9%	52.3	1.3%	50.9	84.3
Limited to under 50" only with winter seasonal limitation	0.0	7.3	0.2%	7.3	0.2%	66.1	39.5
Limited to Bicycle Only	1.0	1.3	0.0%	1.3	0.0%	1.3	1.3
County Maintained (county)	304.2	307.8	7.7%	307.8	7.7%	304.2	304.2
Limited to Foot and Bicycle Only	5.3	5.6	0.1%	8.0	0.2%	5.6	14.0
Limited to Foot Only	5.5	7.1	0.2%	7.1	0.2%	10.4	7.5
Limited to Foot and Horse Only	4.7	46.6	1.2%	50.7	1.3%	50.6	48.3
Limited to Foot, Horse, Bicycle and Motorcycle Only	50.6	88.4	2.2%	85.6	2.1%	46.3	136.6
Limited to Foot, Horse, Bicycle and Motorcycle with seasonal limitation	0.0	3.2	0.1%	3.2	0.1%	0.0	0.0
Limited to Foot, Horse and Bicycle Only	55.3	103.5	2.6%	114.7	2.9%	73.9	83.5
Limited to Foot, Horse and Bicycle Only with winter seasonal limitation	0.0	13.6	0.3%	13.6	0.3%	0.0	0.0
Open to all uses	164.3	862.3	21.6%	1,013.0	25.3%	682.5	1,825.4
Open with a seasonal limitation	3.2	233.7	5.8%	223.1	5.6%	85.5	182.9
Undesignated*	2,935.9	545.2	13.6%	545.2	13.6%	0.0	0.0
Open (in open areas)	305.1	290.2	7.3%	290.2	7.3%	0.0	258.2
Limited to Administrative and Permitted Uses Only	111.7	236.1	6.4%	378.7	9.5%	1,033.9	669.4
No Legal Access		334.7	8.4%	0.0	0.0%		
Closed	36.7	852.8	21.3%	894.8	22.4%	1,585.4	341.5
Total Open to Non-motorized Only	71.8	177.8	4.4%	195.4	4.9%	141.8	154.5
Total Open to Motorized	3,776.4	2,375.3	59.4%	2,527.7	63.2%	1,235.5	2,831.1
Total	3,996.6	3,996.6	100.0%	3,996.6	100.0%	3,996.6	3,996.6

*Because Alternative A represents the No Action alternative where only a limited number of routes have been designated, the miles in each category are representative of only the limited number of miles designated.

3469 - (total open before)
 - must remove County Rds
 - 1777
 1692 (closed to Public)
 4910

2375
 - 308 County
 - 290 open (in open area)
 1777 (open to public)