

**UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF HEARINGS AND APPEALS
INTERIOR BOARD OF LAND APPEALS**

)	IBLA No. 2015 – 250
)	2015 – 251
)	2015 – 263
Brandon Siegfried)	
)	Appeal of August 10, 2015, Decision of the
)	BLM Colorado State Director
)	Grand Junction Travel Management Plan

**BUREAU OF LAND MANAGEMENT’S MOTION TO CONSOLIDATE AND MOTION
FOR EXTENSION OF TIME TO FILE ANSWER**

The Bureau of Land Management (“BLM”), through undersigned counsel, hereby moves to consolidate the above-captioned appeals pursuant to 43 C.F.R. § 4.404, and pursuant to 43 C.F.R. § 4.405(f), requests a 30-day extension of time in which to file a consolidated answer to Appellant Brandon Siegfried’s three statements of reasons.

The cases on appeal present common issues of fact and law, such that consideration of the appeals together will promote efficiency of administrative review. In each of the three appeals, Siegfried challenges the decision of the BLM Colorado State Director, dated August 10, 2015, that approved a travel management plan (“TMP”) for the Grand Junction Field Office along with a resource management plan. In two of the appeals, IBLA 2015-250 and -251, Siegfried challenges specific route designations that were included in the TMP decision. In the third appeal, IBLA 2015-263, Siegfried challenges the same decision with respect to “nearly 400” routes. While the specific route designations at issue in the three appeals do not entirely overlap, all three appeals challenge a single BLM decision. Further, in each of the three appeals, Siegfried raises common legal issues with respect to the application of R.S. 2477 to routes

designated by BLM in its decision.¹ As the appeals involve the same appellant, a single decision and administrative record, and common legal issues, consolidation of the appeals will allow for more efficient administrative review.

BLM also requests a 30-day extension of time in which to file a consolidated answer to Siegfried's three statements of reasons. BLM received the notices of appeal and statements of reasons in IBLA 2015-250 and 2015-251 on September 14, 2015, and the notice of appeal and statement of reasons in IBLA 2015-263 on September 18, 2015. BLM's answers therefore ordinarily would be due by October 14 and 19, 2015, respectively. 43 C.F.R. § 4.414(a). In accordance with 43 C.F.R. § 4.405(f), BLM requests that it be granted a 30-day extension of time from the current due date in IBLA 2015-263, until November 18, 2015, in which to file a consolidated answer to Siegfried's three statements of reasons.

For the foregoing reasons, BLM requests that the Interior Board of Land Appeals consolidate the above-captioned appeals pursuant to 43 C.F.R. § 4.404, and, in accordance with 43 C.F.R. § 4.405(f), grant BLM a 30-day extension of time, until November 18, 2015, in which to file a consolidated answer to Siegfried's three statements of reasons. In the event that the Board declines to consolidate the three appeals, BLM requests that it be granted a 30-day extension of time in which to file its answer in each of the appeals.

¹ In addition to the R.S. 2477 arguments, Siegfried makes particular arguments regarding the route designations at issue in 2015-250 and -251. Although they pertain to specific routes, these issues can be addressed in a consolidated answer.

Respectfully submitted this 13th day of October, 2015.

A handwritten signature in black ink, appearing to read 'Danielle DiMauro', written over a horizontal line.

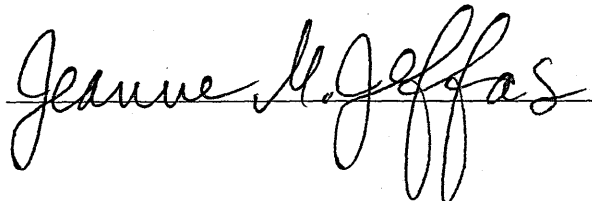
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CERTIFICATE OF SERVICE

I certify that on this 13th day of October, 2015, in accordance with 43 C.F.R. § 4.401(c), a true and correct copy of the foregoing Motion to Consolidate and Motion for Extension of Time in Which to File Answer was transmitted for delivery by U.S. Mail (return receipt requested) and facsimile, with a courtesy copy by electronic mail where indicated, to the following persons at the addresses below:

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