

Public Comments
Submitted at
Mesa County Open House
6 June 2013



MESA COUNTY PRESS RELEASE

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FOR IMMEDIATE RELEASE

Public Open House

Mesa County Seeks Public Comment on BLM's Draft Resource Management Plan

GRAND JUNCTION, CO June 3, 2013— The Mesa County Board of County Commissioners invites the public to an open house to provide input on the Bureau of Land Management's Grand Junction Field Office Draft Resource Management Plan.

Thursday, June 6th, from 5:00 - 6:30 p.m
Mesa County Fairgrounds - Jockey Room

"We're asking the public to share their comments on any part of the BLM's draft RMP to help us compile our final remarks. The vast majority of input we've heard so far relate to the proposed Travel Management Plan in the RMP," said Pete Baier, Public Works Director.

Mesa County is a cooperating agency with the BLM on the draft RMP. Comment sheets will be available at the open house and the public is asked to submit comments to the County by June 12. The deadline for providing comments to the BLM is June 24, 2013.

Interviews for official comment may be coordinated through Ryan Cook.

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"Mesa County—Creating a community of opportunities for all residents with a focus on the future."



OPPOSED

TO

VIR



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I was involved for 2 yrs on the North Fruita Desert task force. I got involved because I used to hike that area. Over the years I saw all the wildlife: prairie dogs, rabbits, eagles & coyotes disappear. The only things that moved in that area were on wheels. I saw the landscape terribly degraded. Now I live in DeBeque. I hike behind De Beque every week. A sign clearly states "stay on designated roads & trails" Motorcyclists & wheelers are continually increasing in numbers and every hill has an illegal trail. I have confronted a couple of people creating new trails coming off of cliffs. My friend & I were very responsibly shooting when we heard motorcycles approaching. We stopped shooting and they came right over the hill in front of us. The wildlife used to be abundant - Deer, elk, Coyotes etc. as for

Comment deadlines: The name "Deer Park"

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): N. J. Fulmer

E-Mail/Phone: njfulmer@live.com
970-216-8277

(over)

Very seldom are these animals seen anymore
The erosion created by the uncontrolled
trails is increasing every day.

There is enough impact on wildlife
and the environment due to the ever
increasing oil & gas exploration in
the De Beque area. The recreational
use needs to be limited to minimize
the impact on environment & wildlife.

More signs need to be posted on V⁴ Rd
Maybe a kiosk for visibility

I am in support of Bang's West being designated as a Land with Wilderness Characteristics. I disagree with the assessment that the area lacks outstanding solitude. I suspect that the assessment was made based solely on a hike to Mica Mine, which is a popular busy trail.

I have hiked Mica Mine trail numerous times and I have done trail work on Mica Mine trail. I have twice hiked in Ladder Canyon above Mica Mine. It is true, as pointed out in the July 2012 "Wilderness Characteristics Inventory Update", that Mica Mine is not a hike in which you can achieve any solitude. But once you get above Mica Mine, you can spend hours and hours without encountering anyone else. The trail is so infrequently used that in places it is easy to lose and my friends and I had to pause a couple of times, staring at the thick grove of vegetation (including in one section a great stand of gambel oak) and try to guess where in the canyon floor the trail might be. We were thrilled to come across numerous tracks of a mountain lion and just hoped they weren't too fresh.

I have hiked Rough Canyon numerous times and while encountering people at the waterfall (where people tend to have lunch), within the canyon it has always felt like it was just our group out hiking. We've lingered within the canyon exploring side canyons. We've discovered interesting exit points other than the traditional one of hiking back along the Tabegauche trail. Quoting from www.gjihikes.com about Rough Canyon "The Bangs Canyon area, with its interesting geology and rare biology, is a welcome playground for the naturalist hiker. It is a wild area close to a moderate population area where some of the less common varieties of nature can be easily observed. The picture below is of a rare Canyon Tree Frog that inhabits the desert southwest. I took this photo in the lower area of Rough Canyon." The hike has frequent water crossing (depending on the time of year), and large boulders to negotiate around and over. Those features discourage the bulk of visitors and make it a place of great solitude as well as a fun, challenging hike. You get a real sense of exploration by going beyond the easy start of Rough Canyon.

I have explored Clark's Bench between Mica Mine and Rough Canyon, up to the square of private property and loved the vast quantity of slick rock and the numerous vantage points with great views of the two canyons. You can stay on the cairned trail or explore the outer edges of this great tilted slab. The angle of the incline makes it a great quick work-out. It is rare to find a local who even knows there's a trail up that slope. This is again a hike I've taken several friends on and we've never seen anyone else in the area once we stepped up and away from the Mica Mine trail.

But there are lots of other fun parts of Bangs West to explore and enjoy in solitude. I've found a patch of wild asparagus that goes completely untouched beyond the end of its picking stage ... and no, I'm not going to say where it is.

I've parked at the Ribbon Trail TH and gone across the road to the undocumented but signed TH and explored the northern tip of "Bangs West". There are some great views down into a tributary canyon of Ladder Canyon. That area used to be open to motorized travel years ago, but now it is quiet and remnants of old roads are fast disappearing. There are great areas of exposed rock that give the area a unique feel and are fun to hike across.

I've scrambled up slopes of Rough Canyon down near the waterfall and realized there is yet more wonderful accessible solitude to lure me back for more visits.

SRMA/ERMA Comments

The upper section of Unaweep Canyon along Highway 141 should be an SRMA for rock climbing. If you look at www.mountainprojects.com you'll see that the climbing community is actively developing a wide spectrum of climbing

and bouldering locations in this area. While I am not a rock climber, I think it is important to help and encourage an activity that appeals to a largely young audience. I've worked with some members of the local climbing community – Western Colorado Climbers Coalition (<http://westernslopeclimbers.blogspot.com/>) on a National Public Lands cleanup day at the Rock Garden climbing area in DENCA. The group is interested in participating in more public lands events that could include not only cleanup days (and there is unfortunately always a need for that) but also trail building and trail maintenance for trails leading to their climbing and bouldering locations.

Bangs Canyon SRMA

Due to the proximity of houses surrounding the 3 zones, campfires should be prohibited in all three zones. Note that “campfires” are separate from camping and overnight use. “campfires” can be an evening or cold afternoon activity. Permitting campfires not only introduces the high probability of wildfire in our very dry climate, but also leads to unsightly litter (it is a rare campfire ring that does not contain broken beer bottles, soda/beer cans or remnants of burned garbage) and wood cutting and collecting in the immediate area of the campfire ring. These trails close to our city should have a higher standard of visual appeal as they reflect on our city's values and impact the impressions formed by tourists to the area. If campfires are to be permitted in any part of these zones then firepans should be required to cut back on the trash problems of traditional fire rings.

Closure Hours 11pm to 5am

The closure hours of 11pm to 5am is much too restrictive (2-132 and 2-133). It should be midnight to 4am.

Hiking by the full moon is a very popular activity in the Grand Valley. In June of this year the full moon doesn't rise until 9pm. It is predicted to be a “Super Full Moon”. Super full moons are an awesome sight to see and well worth a hike to get you to the right viewing position. What better place to hike than one close to the city and most familiar to the hikers. Some of the trails of Zone 1 and Zone 3 are perfect for hiking by the full moon. Cutting the hike short to comply with the 11pm closure takes away the fun of the activity.

Hiking the trails to get a good view point for watching fireworks set off in the valley is also something I enjoy. Sunset on July 4th is not until 8:45, so fireworks often don't start until after 9:30pm. After watching the fireworks it is fun to just relax and enjoy the view of the valley at night for a while. Having to hurry back to the trailhead to not stay beyond the 11pm closure is stressful and would spoil an otherwise fun evening. Watching the fireworks after the Memorial Day JUCO game can put the event well after 10pm.

The best viewing time for meteor showers is often in the hours directly before the start of dawn. To enjoy the view of the meteors you need to get away from the city lights. The trails off Little Park road make for great spots to enjoy a celestial phenomenon.

The overnight closures for Zones 1, 2 and 3 should be midnight to 4am. That has the effect of prohibiting camping without unduly restricting other non-camping activities. Note this should apply equally to Zone 2. Permitting camping in Zone 2 in essence permits middle of the night travel by motorized vehicles and motorcycles. This will result in extra stress to wildlife in the area, including the juniper titmouse (a bird of Conservation Concern) that is known to be in that area (www.gj.hikes.com Billings Canyon hike for photo). Middle of the night motorized travel will also disturb the local residents who live at: 12 710533 4322212 and 12 712243 4322452. Aggravating these neighbours of BLM land is not a good policy nor will it help with future negotiations to increase access.

Bangs Zone 1

Please consider this a public comment on the BLM's Grand Junction Field Office Draft Resource Management Plan.

Name: Janice Shepherd

Address: Grand Junction, CO, 81506

All points in this document are in UTM NAD 83. Some have been translated from Lat/Long and may only be approximate.

Hiking Trails

I believe there needs to be more miles of foot only trails. One of the FACT SHEET's about the RMP lists Alt B has having 7 miles of foot only trails. That is less than 2/10 % of the miles of routes in the GJFO. On narrow single track trails it can be fairly intimidating for a family with very young children or people walking their dogs to encounter horseback riders. I think that part of the appeal of the Mica Mine trail is that trail has no bicyclists and no horseback riders. I've been hiking out in the Devil's Canyon area and had two people on horseback come racing around a corner at a full gallop. At least I was alone and able to jump clear. If I'd had a couple of young children or a dog with me, the situation might have ended very badly. Another aspect of foot only trails is they can be laid out to include more challenging surfaces such as the boulder scrambling along Rough Canyon trail, or something like the bolted ladder that is on Fisher Towers trail. You just have to notice how often the Serpent's Trail TH parking area is full to realize there is a crying need for more hiking trails on public land around Grand Junction.

Closed roads can make great hiking/horse trails as walking or riding side-by-side allows for easier conversation than a single does. Consider converting some of the roads scheduled to be closed to hiking or hiking/horse trails. The bulk of P251 is an example of a road that Alt B lists as to be closed but would make a great Quiet use Trail (Bicycle, horse and foot).

While hikers like myself enjoy off-trail travel, the vast majority of hikers (and there are a lot of hikers in the area) prefer to enjoy of variety of trails. Areas such as trails accessed from Devil's Canyon TH in McInnis Canyon NCA are getting to the point where they are almost too heavily used. There is definitely a need for more hiking trails in the GJFO.

Bangs Canyon at LWC

I write in support of Bangs Canyon being designated as "Land with Wilderness Characteristics" as outlined in alternative C. I have visited the area numerous times, alone and with friends. The hikes always start at the TH on Hwy 141 by the East Creek crossing. I've never seen others recreating in the area except once I met 3 men at the TH off Hwy 141 who'd just finished a mountain bike ride.

I've twice had the thrill of seeing a large herd (15 to 20) of deer (Jan 30th 2013 and April 5th 2013) in the area. In the latter case one deer hung back and stared at us for a long time. I love having such fleeting encounters as it brings forth a sense of wonder and connection to nature.

People who I've brought into the area always remark on the great feeling of solitude and yet it is such an easy spot to access even in a low-clearance low-gas consuming vehicle (with the cost of gas rising more people in the area will be looking for adventures they can get to in such ordinary passenger cars). There are two hikes in the area featured on the popular www.gjhikes.com website. I've done both hikes and more. I enjoy the challenge of finding new ways in and out of Lower Bangs Canyon. It is a great place to go out exploring.

During one visit I made with a friend, we hiked up the road just under 4 miles then headed over to the rim. The view from the rim was stupendous with various side-branches from the main canyon beckoning us to come explore them. I love the feeling of looking out over such a vast space, where there is no obvious imprint from mankind. It is fun to think

that we will be the first to explore and discover the area, even though I know the reality is otherwise. We both stood at the rim and said "WOW!" We were lucky enough to find a spot where we could scramble down into the side canyon. We soon encountered evidence of elk, not only their scat but where they'd very recently rubbed off the branches from a young pine tree, the green boughs left lying at the base of the tree. A 2nd tree had been rubbed enough to strip off the bark. We both thought this was really cool and I kept wondering if the elk was still nearby and watching us go by. We also noticed that the trees on the canyon floor were ancient specimens. I get a sense of connection to the history of the area seeing such a grove of large old trees. I could be stepping back in to the pages of books like "Lonesome Dove". Even the cows we saw later in the day fit into that historical mental reenactment. I loved sharing this experience with my friend.

During almost every visit to this area I find new fascinating geological features (rocks with worm-like tunnels, slick-rock with embedded tube-stripes, green mud walls, mud walls with rainbow colours (reminiscent of parts of Death Valley Ntl Park), rocks with spotted fever, the old-woman-on-the-cliff-wall, arches, and a small natural bridge (images: IMG_3939, IMG_3941, IMG_4118, IMG_4688, IMG_9124).

I've also seen evidence of cultural resources in the area that I'll not list here but that also give me a sense of connection to the area's historic and prehistoric past. I'm the kind of person whose imagination is triggered when I find even an old coffee can "in the middle of nowhere". Who left this here? And when? Were they passing through or living and working here? Why did they use their own can-opener instead of the attached peel-back key? How far away did they have to go to buy the can? So that old coffee can is definitely an exciting thing for me to come across and to ponder about. I love exercising my imagination in this way. I believe that as adults, if we don't regularly exercise our imaginations that ability goes stale. To use a cliché, we stop thinking outside the box and that has bad ramifications and leads to lost opportunities.

While I am not a "birder" in that my ability to recognize and name birds is limited, I do very much enjoy seeing and hearing birds. On my walks in this area I've seen numerous birds of prey, sat and enjoyed the sounds of canyon wrens and marveled at the glue that hold up cliff swallows nests. (IMG_4122, IMG_6551) The birds, deer and elk clearly think this is a land with wilderness characteristics. I concur. So I advocate for this area to get that designation.

Keypoints:

- many visits with no encounters of other people except at the TH
- presence of large wildlife (deer, elk)
- diversity of birds
- fantastic vistas of untouched land, beckoning to be explored on foot
- the majority of the area has only natural sounds and sights
- interesting range of geological features
- historic and prehistoric cultural resources give connection to history of the area.
- proximity to home and ease of access of TH in an ordinary passenger car
- sharing all these great experiences and discoveries with friends

Currently there is limited motorized traffic on this segment of the Tabeguache trail as it is a dead-end with no access to Hwy 141. I would prefer to keep that situation as is, because I so enjoy hiking in this area without the sounds of traffic (unless I'm walking the rim looking down at Hwy 141 and that's fun too). There are so few places and so few acres in the GJFO where motorized traffic is not an encumbrance to enjoying a quiet natural outdoor experience.

I support the description of the CTTM on page K-18 "Limit all modes of travel (including foot and horse) to designated routes in the Lunch Loop Trail system (north of Andy's Loop and Little Park Road)." This makes sense due to the heavy use the area gets. Once south of Andy's Loop the area is much less frequented and there are some very interesting opportunities for cross-country travel for hikers. There are several loops that can be made starting on Ribbon Trail and circling back via different canyons. The description of the CTTM on page K-17 "Close to motorized travel and limit all other modes of travel to designated routes." should be changed to be the same description as the one on K-18.

Bangs Zone 2

Due to the problems of transients looking for long-term camping places close to town and large groups looking for "party" spots, camping and overnight use should be prohibited in this zone as it is in Zones 1 and 3.

A single annual monitoring of the area is not sufficient. For years I participated within the CMC in a program to do monthly monitoring of Flume Canyon Trail. Monthly monitoring is even more important for motorized routes. A single hiker stepping off a hiking trail usually leaves little visual evidence. It is visual evidence of "another" trail that leads to repeated use. A single motorized user creating their own motorized path will leave a very evident trail and motorized users after them may misunderstand the situation and think the trail is a designated route. The monitoring of Zone 2 should be monthly as permitted by conditions.

Bangs Zone 3

The boundaries of Zone 3 should include the section of land surrounding routes: P665, P1228, P1229 and P1230. Little Park Road makes a good natural boundary surrounding that part of Zone 1. I've seen a map that has that section as part of Zone 1, but if mountain bikes are introduced to that area and since the trails such as P1230, P1229 and P1228 connect to Mica Mine trail via P554 then what will keep mtn bikes from inadvertently ending up on Mica Mine Trail.

This zone should be significantly larger to allow for the creation of some long hiking trails. Many of us enjoy the hike from Pollack TH out to Rattlesnake Arches, not just because of the destination but the challenge of a 15 mile hike with interesting and varied terrain along the way. If we just wanted to visit the Arches we'd drive to the closer TH. This zone of the SRMA could also include one or more long distance hiking trails. This zone should incorporate all of the area referred to as "Bangs West" in the Wilderness Characteristics Inventory.

There is the line in the description for Zone 2: "Private property parcels within this unit should be sought for acquisition" A similar line is needed for Zone 3. Specifically it is important for the BLM to acquire the square of land that cuts P890 in two. The current landowner has recently installed no trespassing signs on this parcel, thus blocking access to the upper portion of P890.

The management focus of Zone 3 specifically mentions "primitive hiking" and the social contact description specifically refers to developed trails such as Mica Mine Trail vs other parts of the Zone. Primitive hiking to me is travelling off designated routes. That's the type of hiking that I really enjoy as it gives me a great feeling of discovery and exploration. Further there is no mention of mountain biking as an activity for the area other than along the Tabeguache Trail. The CTTM for Zone 3 currently reads: "Close to motorized vehicle use, (except for the Tabeguache Trail) and limit all other modes of travel to designated routes". Instead this should read "Close to motorized and mechanized use, (except for the Tabeguache Trail) and allow cross-country travel for all other modes."

Camping, but not campfires, should be permitted in upper Ladder Canyon, above Mica Mine and the waterfall. The area feels wonderfully remote. A lack of water most of the year will limit the extent of camping stays as people will have to haul water in with them. The difficulty of getting back there will mean the area is not an attraction to either transients or "party" people. Closing the rest of Zone 3 to camping is a good idea. Since Rough Canyon ACEC is almost completely enclosed by Zone 3, it seems that camping should also be prohibited in all of the Rough Canyon ACEC.

Prairie Canyon ACEC and other Burrowing Owl habitat

I'm writing in support of the creation of the Prairie Canyon ACEC. It is very distressing to consider the grave decline in the number of burrowing owls in the Grand Valley over the last 30 years. Establishing this ACEC is but a small step that is needed to help the burrowing owl reestablish the numbers to remain viable in this area. Timing limitations imposed during burrowing owl nesting season should include stopping stressful human activities such as target shooting. I support the closure of roads in areas known for prairie dog colonies because those areas are also areas of burrowing owl nests. Rehabilitation of closed roads in burrowing owl areas should be a priority in order to open more land for nesting and to reconnect land that has otherwise been dissected by excessive human impact. These are such amazing birds it is worth the effort and sacrifice to do what is necessary to increase their population numbers to 1980's levels.

Target Shooting

CPW is considering building a shooting range within the Grand Valley. If that is built that will provide target shooters with two great locations for target shooting, the CPW facility and the BLM's very nice shooting range facility at 27 ¼ Road. With two such great facilities available, large areas of BLM land within the GJFO do not need to remain open to target shooting. Target shooting does not have to be open everywhere within the GJFO. I support the restrictions listed on pages 2-135 and 2-136 under alternative C. Restrictions are necessary to protect other users and the resources of the GJFO. Any area where foot travel is limited to designated routes should also be closed to target shooting. The reason is because you can't set up your target without stepping off a designated route. This would add Palisade Rim ERMA to the list of areas prohibited to target shooting. Areas closed seasonally to foot travel would also therefore be closed to target shooting during that seasonal closure. LWCs should also be closed to target shooting as the noise from shooting is inconsistent with the goals of providing a wilderness experience for visitors and wildlife.

Wildlife emphasis areas should also be excluded from target shooting. Without wildlife getting protection from the stresses of human impacts such as target shooting, it is not clear that the future will have enough wildlife for hunters to have viable game to hunt. Viewing wildlife whether big game animals or small creatures like cute prairie dogs or burrowing owls is a major tourist draw for Western states. Such tourism is a major economic resource for the Grand Valley.

ACECs should also be excluded from target shooting.

Areas of Open motorized travel should be closed to target shooting to protect the motorized users. Unlike quiet users (foot, horseback and bicycle), motorized users may not hear the shooting over the noise of their engines. In an open motorized travel area they may come up and over a "backstop" being used for target shooting without any realization that they are putting their lives in danger. I support the RMPs position that open motorized travel areas should be closed to target shooting.

It is my experience that target shooting results in large trash areas. I have collected pounds and pounds of shell casings and other trash left behind by target shooters. It is time to limit their impact on public lands by limiting the areas where target shooting can take place.

While the rules indicate that target shooters must bring their own targets, unfortunately the shooting of signs such as Gas Pipeline markers is all too common. Along A45, for example, the pipeline markers are so full of holes that some of the signs are completely shredded. BLM signs have also been severely damaged and replacing them costs us taxpayers money that could be spent on more important priorities. Limiting target shooting to specific areas might help reduce these costly vandalism.

On page 4-214 it is indicated that North Fruita Desert SRMA has no significant cultural resources. On a recent hike in the area I found quite a few artifacts that were historical in nature and likely attributable to the mining industry. Mining has a great history in Colorado and preserving old mine sites is important especially where this is evidence of people living near the mines, such as there is in Hunter Canyon. Increased recreational use especially in the form of vehicle traffic increases the likelihood of vandalism and theft (for the value of the metal) of historic artifacts. I'm guessing that these cultural resources and likely others within the North Fruita Desert SRMA are not on file at the BLM because no survey has been done of the area where they are.

Barrel Springs: An ERMA should either aim to support hunting or OHV travel but not both. Given that wildlife are scared off by the sounds of OHV traffic, the Barrel Springs ERMA will immediately have a conflict of users if it tries to support both hunting and OHV use. When there is a conflict between the two groups, which group will get priority treatment by the BLM. Better for the BLM to indicate this ERMA is for hunting only. Any OHV use in the area should at least be suspended or kept to a few key routes during hunting season, to allow hunters a chance to track animals without a motorcycle or two roaring by and sending the game scattering, especially during bow season. I've met and talked to a number of bow hunters. In all cases they were on foot. They were staying well clear of wildlife disturbances such as OHV users. Setting up an ERMA that is supposed to support both hunting and OHV use just does not make sense. I support this ERMA being set up for hunting as the sole objective. This would allow some OHV use in the area but put the priority on hunting.

Route Comments

I don't think it is appropriate to mark all roads leading to gas/oil well sites as Administrative and Permittee only. Unless there is active drilling going on, these areas of existing disturbance make great parking and turn around spots. In places with busy county roads it is much better for visitors to use the existing pads for parking then to attempt parking on the shoulder of the county road or to create new parking or turn-around spots. V 2/10 road for example has numerous large trucks roaring down it, so parking along it is not a safe option. Many of the existing pads are large enough to easily accommodate parking of 2 vehicles with trailers without hindering any servicing needed to the pad equipment. Far better than people creating yet more disturbed areas when looking for parking. Further, by allowing ordinary citizens to be in proximity of well pads the BLM will gain the benefit of citizens acting as watchdogs for problems that might arise. That is, after all, the purpose of each site having a sign with an Emergency contact. A new route designation should be created to label these routes as open until such time as the well pad is to undergo restoration.

Quite a few roads exist for access to stock ponds and other grazing permittee needs. If they are to be limited to Admin/Permittee and closed to the general public then their use should be limited to grazing purposes. Allowing the permittee or an outfitter with a permit to use such roads for hunting access is not fair to the rest of the hunters. When a hunter is hiking into an area and is passed by an outfitter in a vehicle with a group of paying hunters, that is very frustrating to the hunter that is hiking. Either the road should be open to the general public for hunting or it should be closed to all hunters. Such uneven treatment can easily lead to non-permit hunters creating their own roads into hunting areas.

It is very confusing that the KMZ files for the routes don't distinguish between "Horse and Foot" trails and "Foot only" trails.

I support the position of closing Q761, it is such an eyesore. The erosion is terrible and it is definitely not a sustainable route.

Dust

With our dry climate dirt roads in around here are a major source of dust in our air. Everyone knows that you can see a vehicle a long way off coming down a road because of the dust bloom that is following it. The heavier of the particles fall back to Earth but the lighter ones are carried by winds up into the atmosphere. Dust in the atmosphere leads to two problems (1) it reduces air quality especially during the inversions we sometimes have (2) it lands on snow. These last two years we've seen the Grand Valley air quality hit poor quality levels we've not seen before. Some people have been advised even to stay indoors during those days. See this article that appeared in the Grand Junction Daily Sentinel <http://www.gjsentinel.com/news/articles/air-trap-inversions-can-spell-hell-for-many-in-val> about how our air quality was worse on some days than Denver's or Salt Lake City's, both with sizably larger populations than ours. Dust from roads is a known contributor to poor air quality (otherwise the EPA wouldn't list paving roads as a mitigation action). When dust lands on snow it affects us in 3 ways: 1) it leads to earlier spring run-off 2) it effects the quality of down-hill and cross-country skiing (both huge tourists draws to Colorado) 3) it is visually ugly.

Closing roads or limiting them to Admin/Permittee status will help reduce the amount of dust in our air. I support BLM's preferred Alternative B's approach at reducing the number of roads open to recreation, as I believe this will help reduce our dust problems. The RMP mentions closing some areas during high wind events. I support that as well. I also believe these and other areas should also be closed during periods of Inversion.

Reducing the speed of travel on roads is also known to reduce the amount of dust. "Fast moving vehicles stir up dust. Studies show that PM10, or dust, goes up with vehicle speed. Reducing speed from 40 miles per hour (mph) to 20 mph reduces dust emissions by 65%." - from: http://www.dec.state.ak.us/air/anpms/Dust/topten_dustctrl2.htm While it is true that only some BLM roads support higher speeds of travel, the BLM should work to limit speeds on all BLM roads to reduce emitted dust.

Other Comments about the text

There is no mention of paintballing. Paintballs are mostly designed to dissolve with water over time. In our dry climate we can have long stretches of time with no rain or not enough rainfall to eliminate the visual impact that paintballs tend to leave against rocks, walls and inside alcoves. Paintballing should be limited to a few places and all of those places should have VRI Class designation of IV and not be wildlife emphasis areas.

Much as we have seen the introduction of ATVs and UTVs change the dynamic of recreation and ranching in the west, I believe that the use of drones may be the next "big" thing. Recreational use of drones is increasing. Regulations are likely to change soon that relax limits on their use to within eye-sight of the user. Soon the BLM will be under pressure to allow both recreationists and cattle ranchers to use drones across large spaces of BLM land. Now is the time for the BLM to start considering the impact such drones will have on wildlife and what conflicts will arise from other visitors to BLM land. It is better to introduce rules now such as no drones within SRMAs, LWCs, wildlife emphasis areas and ACECs, then to wait and try to play catch-up when the use of drones gets popular locally. Recreational use of drones is already popular in Eastern US. According to the article below 500,000 recreational drones have already been sold. I certainly don't want some drone buzzing above me while I'm out enjoying our public land. But mainly I worry about the stresses to wildlife and the potential of the use of drones to scope out where big game animals are located for improved hunting results. I can imagine commercial hunting outfits sending out a drone ahead of an outfitted trip to improve the customers' chance at bagging a prize animal. The BLM needs to develop a strategy in cooperation with the State and Federal Wildlife agencies on the use of drones and what restrictions should be applied to prevent misuse.

<http://money.cnn.com/2013/01/09/technology/drones/index.html>

I702 and I627 connect fragmented sections of county road V 8/10 Road. It is very odd that the county road is not contiguous. It appears to be in the Mesa County Atlas document. Should I702 and I627 be listed as a county road?

V 8/10 Road is shown having an extra side branch that connects to I906. This side branch does not seem to be in the Mesa County Atlas. Should the side branch be listed as a BLM road?

Q854 is listed in alt B as Administrative/Permitted. This should be changed to closed. The route ends in a fence with a large No trespassing sign (see IMG_9201). This is a fence closing the way not a gate, so it appears that the landowner is not interested in using this access road. Even a sole recent motorized visitor turned around about 1/3 of the way up the road.

Q835 is listed in alt B as Administrative/Permitted. This should be changed to closed past 12 S 698872 4320885. There are significant erosion problems on this route in the area to the west of 12 S 698828 4320902 (for example see images IMG_9205 and IMG_9206). Significant work would need to be done to keep this route viable for motorized use. Better to save limited resources and close the north portion of this route. If access is needed for purposes such as retrieving cattle, it should be done on foot or horseback.

User created side roads off Q170 are being used for wood collecting, presumably without permits. There is extensive dead and downed wood in the area. So either this network of roads should be changed to Admin/Permittee only for a few years (with locks at the gates) or the BLM should consider opening it up to permitted wood collecting to reduce potential material that is tempting those who collect firewood without permits.

P145 is listed to be closed. I think it should be left open but left unsigned. It is a fun short alternative to Mica Mine and quieter. Just recently I saw 4 people hiking down the trail, so I'm not the only one who enjoys it. It is nice to have views of familiar places from different perspectives. Brings to your attention features you'd not noticed before because it focuses the mind on orienteering.

P339 appears to be a private road. The owner has installed a chain across it at 12 S 704286 4318321 – see image IMG_9136. So P339 should be changed in the inventory to a private road. It is being actively used by the owner. That applies to P176 too.

I walked on P184 and P185 recently and they have not been used by a vehicle in years. As the area is otherwise listed as being closed to mechanized and motorized vehicles it does not make sense to keep these as open. Since P339 where P184 (and P185) come from is a private road, the private owner can park on their private road and walk to the designated trail. They don't need a motorized road for such access. They should be changed to closed.

The two trailheads (12 S 704133 4318776 – IMG_9131; and 12 S 704353 4318832 – IMG_9152) across the highway from the Ribbon Trail need to lead to signed, defined hiking trails. I recently encountered a woman hiking in the area with her two dogs. She said she'd love that area to have some defined trails, she'd had to stick to walking near the fence line for fear of getting lost.

There appears to be a road leading from B76 at 12 S 680918 4369830 that is not in the inventory.

P217 in Ladder Canyon above Mica Mine is listed as Horse and Foot. The trail up the slope above the water falls at Mica Mine is steep, narrow and rough. I really doubt it is suitable for horses.

Routes O980 through O983 are listed in Alt B as being closed. But these routes are there to provide access to the communication towers. They should be listed as Admin/Permitted instead.

The route to one of the communication towers at 12 S 739943 4330243 is not in the inventory. It is visible in Google Earth.

In Zone I, I11 and I14 lead to a stock pond so keeping them open for Admin/Permittee makes sense. The same is true of I1034. The other Admin/Permittee routes in the area: I1030, I12, I11 beyond I14 and I905 appear to serve no purpose and should be closed. Also there is no need to have two access roads leading to I11,

The new Upper Palisade Rim trail is missing from the inventory. This route should be considered for seasonal closure as there is evidence of heavy elk winter usage within the upper loop. BLM wildlife experts and CPW should work out appropriate closure dates.

The majority of P890 is no longer accessible as the owner of the private land just after the notch has put up a No Trespassing sign. The BLM should work with the landowner to see if access can be reinstated. Did BLM previously have an agreement in place for a ROW through the property? Doesn't that hold even if the property changes hands? This should be investigated. If access is not viable then the upper portion of P890 should be considered closed and removed from the inventory.

P450 should stay open to motorized vehicles as it is a popular rock climbing / bouldering area with over 12 boulders being used in the area.

The parking area in Zone P just off Hwy 141 around the dinosaur bone outline boulder should be left open. It is at approx. 12 S 717571 4312004. There is no number on the map. People enjoy seeing the outline of the dinosaur bone. Children, especially young boys, get very excited about anything related to dinosaurs. If the parking is closed then people will end up parking on the shoulder of Hwy 141. It is much safer for a family with small children if they can park completely off Hwy 141 and not just on the shoulder. Just picture a 7 year old throwing open the car door and leaping from the back seat so he can get a closer look. Keeping just enough for parking and closing the rest would be fine with me.

The unnumbered route that connects O8, O1, and O1045 is listed as permitting motorcycles in Alt B. This is not consistent with the existing signs and what appears to be the established agreements between the BLM and various stakeholders. See images IMG_8678 and IMG_8689. I recently spoke with a representative of Palisade Water and he indicated that Palisade has opened their roads in the area to bicycles. He understood that that these roads are not what typical mountain bikers are looking for. O8 and O1045 are exactly the type of roads I'd be interested in riding my bicycle on. I'm looking for quiet, fairly well graded roads or two tracks without much in the way of rocks, twists and turns. I'm sure I'm not alone. I normally ride on pavement or paved tracks like the Riverfront trail. I'm looking to broaden my bicycling adventures but definitely can't handle anything with much in the way of rocks or sharp turns. I believe O8 and O1045 would be perfect. Now that I know they are open to bicycles I'm looking forward to exploring them. O1 and O1045 should be listed as bicycle, horse or foot. It would be great if the BLM could work with the private land owner of the land around Cabin Reservoir so that a complete loop could be open for this type of casual "non-mountain" bicycling.

P153 has a heavy metal gate closing off access. It should be marked as Admin/Permit, or closed or foot only.

P132 is closed off with a cable. It should be marked as closed or foot only.

with this 2nd trail head in that it does not lead to a designated set of trails. The number of trails spreading out from this trail head has grown significantly in the last few years. People want alternatives to the Ribbon Trail and follow social trails created by others, so that over time it is hard to tell which trail to follow that will not just lead to a dead end in 10 minutes.

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P217 in Ladder Canyon above Mica Mine is listed as Horse and Foot. The trail up the slope above the water falls at Mica Mine is steep, narrow and rough. I really doubt it is suitable for horse riders.

P251 to the first parking spot near 12 S 675233 4313515 and P249 should be kept open to allow people to enjoy the shade of the cottonwoods by East Creek. This is a great spot for families to hang out on a hot spring/summer day. Because it is well below the level of the highway young children can enjoy the area without concern for fast traffic going by. The area should be a no camping area however. The road also allows rock/boulder climbers to get across the creek to access a wide spectrum of climbing spots. As per my earlier comment the rest of P251 should be changed to a bicycle/horse/foot trail.

M407 is a great trail to hike in cooler weather. The steep climb is a great challenge and a good work-out. There are fun encounters with wild horses and the views are wonderful. The trail shown in the inventory does not quite follow the trail on the ground as it swings around Corcoran Point. For example the trail crosses 12 S 714385 4345664 and 12 S 714375 4345918.

The county roads in the area of F92 are not reported correctly in the inventory. There is one missing county road attached to F92 and it appears that two others are marked as black BLM roads instead of white county roads. I compared these to page 13 in the Mesa County Road atlas.

M68, M63, M64, M65 and M67 all parallel a county road. They are redundant and should be closed instead of marked as Admin/Permittee.



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

The inversion we had this year Jan & part of Feb - is or all for clean healthy air. Many sources contribute, but nothing will get done if there are no strong regulations to keep this Valley from becoming a violated air space. Open Burning described by the State is burning of any flammable material on any open premises - The CO Dept of Public Health & Environment has determined that open burning is detrimental to the public health, environment & general air quality in CO. Depending on the material burned, open fires can release toxic fumes & gases. People with allergies have difficulties breathing & COPD is a big problem. On top of toxic fumes, there is property damage from unregulated improper open burning in each of our five districts. Pollutants such as naphthalene, sulfur dioxide, nitrogen oxide & many chemicals used in fracking should be noted. The Denver Post stated 263 spills in Garfield County alone were reported to the COGCC between Jan 1, 08 & June 15, 2000 involving 66, 386 barrels of fluid - What emergency salaries are in

**Comment deadlines:
Mesa County - 12 June (mclrange@mesacounty.us)**

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

place that address malfunction > Clean air clean water is everyone's right - Stricter regulations are needed so we can remain healthy.

Name (optional): Peggy Rowlin E-Mail/Phone: 970-263-2441



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

Your vested routes need to consider wild life habitat, migration routes. You need to consider the "Big picture" and not just travel. At the open house there were no maps on wildlife. You need to consider the consequences of all these "vested routes". Some ^{routes} are small and some need to be eliminated. ^{Some of these roads} It has been shown in several scientific studies that ATV travel adversely affects wild life. If wild life population decline then hunting dollars will decline.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Eric Rechel

E-Mail/Phone: erarechel@hotmail.com



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

We can see from the maps that the county roads are often key to getting access to public lands. It is therefore crucial that the county step up to do proper and thorough grading and maintenance (non-winter ~~at~~ or least) of all county roads. It is the first step to ensuring that all Mesa County residents and visitors have access to ~~the~~ our public lands. Many residents + visitors drive ordinary passenger vehicles - no high clearance, no 4-wheel drive. That's why graded roads are so important.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Janice Shepherd E-Mail/Phone: _____
Grand Id, CO 81506



MESA COUNTY

GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

1) oil & gas management on BLM land: The BLM has promulgated Best Management Practices but to date has not implemented them. I urge the Board of County Commissioners to recommend that these practices be required.

2) Travel Management Plan. At this time there are redundant roads constructed by ATVs or other motorized users. As a result, vegetation has been eroded & more dust emitted. The BLM should close redundant routes & insure that some routes are left for quiet users only. Air pollution in the county is a serious problem, and motorized vehicles contribute to that problem.

Comment deadlines:
Mesa County - 12 June (mclrange@mesacounty.us)
BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Joan Woodward

vehicles contribute while not perfect act. C strikes a good balance in this regard
E-Mail/Phone: justjoan@briansman.net



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

Please see attached letter!

Comment deadlines:
Mesa County - 12 June (mclrange@mesacounty.us)
BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Carole Chouen

E-Mail/Phone: _____

Carole Chowen
P.O. Box 2741
Grand Junction, CO 81502-2741
970 256-1851
carole_chowen@yahoo.com

June 6, 2013

MESA COUNTY
Board of County Commissioners
Steve Acquafresca, John Justman, Rose Pugliese

Greetings,

Please as our elected representatives give fair consideration to all sides when hearing comments on the Bureau of Land Management Draft Management Resource Plan. At this point it seems you have given your full support to the off road motorized vehicle industry in their aim to take their machines anywhere and everywhere.

Before you make a commitment, please consider the families, the senior citizens and all those in between who want and need an opportunity to safely and quietly enjoy our natural treasures. Please leave some safe, quiet use lands with wilderness characteristics.

After reading the study information available, I strongly encourage you to support protection of the 12 areas designated with significant wilderness characteristics in Alternative C.

In years past, in another part of Colorado, I was able to hike extensively. Often going solo into wild areas, I felt restored by the sounds of nature, the sighting of wildlife the clean air and water. However, over those many years, the quality of the back county experience began to degrade with motorized vehicles pushing further into special places. Once roads invade a wild area, it is very hard to reclaim that land to what nature intended. Humans have forced our wildlife neighbors into smaller and smaller areas, we need to leave them some room to survive.

For those who enjoy a quiet excursion into our wild areas, this is becoming harder to achieve. Motorized recreation compromises watersheds, creates dust, degrades air quality, creates sound pollution and causes loss of safe habitat for wildlife.

It can also cause dangers to those on foot or horseback. Personally, I have been put in danger by irresponsible jeep, ATV and dirt bike riders on more than one occasion. Their idea of "sharing the road" is for anyone not on a machine to jump off the path and get out of their way. On one such occasion, falling into a culvert, I turned my ankle and the hike out was painful. Though they saw what they had done, those who forced me off the path did not stop to check on my safety.

In recent years, since moving to Grand Junction, my hiking was curtailed by knee and back injuries, and surgeries. Sadly, I've not yet been able to get out into the wonderful areas being considered in the BLM Draft Management Plan as I would like. Now a senior citizen, I realize my hiking will never be as extensive as in the past. However, I want to see the wonderful areas I might not be able to visit protected for generations to come.

The motorized community wants you to think they lack access and their "rights" are being denied. This is far from true. A large amount of land is now and will continue to be available for their travel under Alternative C.

Sincerely,



Carole Chowen

SPECIFIC ROUTES



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

PLEASE ADD THE FOLLOWING ROUTES TO THE LIST OF VESTED ROUTES AS THEY ARE VALUED MOTORCYCLE TRAILS:
K213, K241, K273, K248, K277, K202, K203, K196, K199, K150 AND K205. IN ZONE C, C21, C22 & C23.
IN ZONE I, I-111, I-450, I-440, I-433, I-282, I-283, I-284.

I VERY STRONGLY SUPPORT THE COUNTY'S EFFORT TO DEFEND THE ZONE L OPEN AREA. THIS AREA IS IDEAL FOR WHAT IT'S PREDOMINANTLY USED FOR - OHV'S. IT MAKES GREAT SENSE TO KEEP IT OPEN AS IT WOULD BE SO IMPRACTICAL TO TRY TO CLOSE OR RESTRICT IT AS TO BE IMPOSSIBLE. THERE IS NO PRACTICAL WAY TO DO IT. OF COURSE, IT IS A HUGE DRAW AND ECONOMIC BOON TO THE GRAND VALLEY,

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): JOHN POTTER

E-Mail/Phone: JMPOTTER1@AOL.COM



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
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BLM MAP Q GLADE PARK
TIMBER RIDGE NEEDS TO BE KEPT OPEN FOR MOTOR-
IZED TRAVEL.

NORTH OF THE KING CANYON ROAD NEEDS TO BE
KEPT OPEN FOR MOTORIZED TRAVEL

THERE ARE ESTABLISHED ROADS IN ALL OF GLADE
PARK. THESE NEED TO BE KEPT OPEN FOR MOTORIZED
TRAVEL FOR RECREATION & FIRE CONTROL.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Jim Joslyn

E-Mail/Phone: 216-2560 CELL
245-7467 HOME



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
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Zone **O** I like Alternative **A**
The Desert out there has to be
open but ~~not~~ developed to preserve
the quiet beauty of it.

For Zone **V** I'd go with Alternative B close redundant roads

For Zone **W** I'd go with Alternative **A**
The ~~water~~ facing out there is good

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Eric

E-Mail/Phone: 970-270-9696

Specific Trail Comments

By Jerry Smith

BLM GJFO RMP

Coon Hollow Road/Trail (North and West of De Beque, CO)

Area F -- F195; F196; F172; F655; F609; and others

1. Some history:

- a. The Coon Hollow Road/Trail is a very significant and *extremely rare* kind of experience for Jeep-size vehicles and other OHVs in the entire GJFO jurisdiction and/or in the entire western U.S.
- b. *In the GJFO management area, there are only three roads/trails that meet the following criteria:*
 - i. Primitive class 6 or 7 for difficulty and over 4-miles in length
 - ii. Scenic, yet not easily seen or offensive from the immediate area
 - iii. Challenge the driver's skills and the capabilities of their vehicle
- c. The Affected Environment has shown no, or very little detrimental effects from the long time existence of the Coon Hollow road/trail. If allowed, the adoption of this trail may

**SUPPORTIVE
NON-SPECIFIC**

actually enhance the area with some work to slow the rate of erosion in key areas.

- d. The Coon Hollow road/trail has been added to the requested road/trail inventory for Special Recreation Permits (SRP) for the Grand Mesa Jeep Club's annual "Rock Junction 2013" event. **(On this SRP, we were turned down)**
- e. The Coon Hollow road/trail has been documented on BLM maps for many years as a "Jeep Trail".
- f. The Grand Mesa Jeep Club may formally submit to the BLM for "Adopt-A-Trail" status of the Coon Hollow road/trail.
 - i. This would allow the Grand Mesa Jeep Club to maintain this road/trail through volunteerism
 - ii. This would keep maintenance costs to a minimum for the BLM.
- g. The Mayor of De Beque (Wayne Klahn) vehemently supports keeping the Coon Hollow road/trail open to **all** motorized use.
- h. The community of De Beque will benefit directly socially and economically from keeping the Coon Hollow road/trail open to all motorized use.
 - i. The Coon Hollow road/trail is relatively close to Interstate 70. Access from the interstate would be easy.

- ii. As the Coon Hollow road/trail gains in notoriety, more traffic can be anticipated, as it would have “quick access” from an Interstate Highway.

2. Expected Experiences

- a. At the top of the trail there is a saddle that one crosses. As you top the saddle, your heart will skip a beat or two as the view goes from one of relative close and confined to a panorama that expands before you showing a very wide view of western Colorado and into Utah. It is truly an experience that should be mandatory in everyone’s lifetime.
- b. The driving experience of the Coon Hollow Road/Trail going up is totally different than the coming down experience, making it two entirely unique experiences.
 - i. Going up you see primarily blue sky and the narrow road through the trees and brush off the sides of the ridge.
 - ii. Going up you are unfamiliar with the trail and the obstacles. Your main focus is on the trail. Occasionally, your gaze will wander and you will become mesmerized by the beauty surrounding you.
 - iii. Coming down, the view through your windshield opens to a panorama of grand vistas clear to and over the town of De Begue to the Battlement Mesa. Your familiarity with the trail and the angle of the view before you makes you want to stop often for “Kodak Moments”.

- iv. Your appreciation for what God has made grows with every turn and crest overcome.
- v. As a “Cherry-stemmed” road/trail into an area with “Wilderness Characteristics”, the Coon Hollow road/trail is extremely unique. **This experience is rarely found *anywhere*.**
 - 1. Anyone with a vehicle capable of accessing the upper Coon Hollow road/trail or who may ride with those that do, will have the opportunity to have a true “Wilderness Experience” without the need for all the personal physical exertion normally required.
 - 2. This access would allow people with disabilities, youth and/or the elderly not up to walking these distances and steep grades the pleasures of a true “Wilderness Experience” in a truly beautiful setting.
 - 3. The opportunity for “Quiet Users” to “get away from it all” will be much easier than they can experience in most designated Wilderness Areas. Their access to a “Wilderness Experience” of this magnitude without the exertion normally expected will draw many of them to accept the very occasional disturbance of a motorized vehicle and maybe become more tolerant of the disturbance.

vi. As a BLM identified “Cherry-stemmed” road/trail into an area with “Wilderness Characteristics”, the existence of the Coon Hollow road/trail should disallow the surrounding area as qualified for “Wilderness Characteristics”. Wilderness should have no significant signs of man and a road/trail is a significant sign of man’s presence.

3. We ask that the BLM give serious consideration to changing the 2013 RMP management of the entire length of the Coon Hollow road/trail as an Open, “Primitive” road/trail, with ALL Motorized vehicular use being the “Primary” recreational use under the designation of Special Recreation Management Area (SRMA).

The Pace Lake Road/Trail

By Jerry Smith

(On the northwest corner of Sinbad Valley)

Area W, W217; W103; W17; W18; W19; W209;

1. History:

- a. The Pace Lake Road/Trail is a very rare, difficult, and primitive road/trail. Depending on where you measure from, it's length can be nearly 10-miles one-way.**
- b. The history, geology, wildlife, and scenic vistas provided by the Sinbad Valley/ Sewemup Mesa area make this road/trail very special to the 4-wheeling community.**
- c. After several years of closure by Mother Nature Grand Mesa Jeep Club member Jerry Smith reopened this road/trail in the fall of 2008. Every year since then, he (and occasionally others) have reopened and performed the required maintenance to keep this primitive road/trail accessible and sustainable by those adventurous enough to try it.**
- d. Normally, every two years requires several hours of brush trimming to keep the Gambel Oak and**

Mountain Ash from encroaching into the road.

Every year there are new rocks and trees to remove from the road to keep it passible.

Often, one or more washes require work to keep them open and safely passable.

- e. Historically, the first trip into Pace Lake each spring requires removal of large rocks, fallen trees, and brush trimming from the roadway surface. Much of the fallen rock and brush trimmings end up as new barriers/ diversions for erosion done from spring run-off. The run-off through the “burned area” can be substantial depending on the snowpack and spring weather circumstances.
- f. The Pace Lake road/trail has had a special use permit for the Grand Mesa Jeep Club annual “Rock Junction” event which has already been applied for in 2013 as well.
- g. Much of the Pace Lake road/trail is a Mesa County “vested interest” county road.
- h. The Grand Mesa Jeep Club may consider applying for “Adopt-A-Road” status for the Pace Lake road/trail.

2. Expected Experience(s):

- a. The Pace Lake road/trail has many qualities that make it unique and highly desirable to the 4x4 public:

- i. The scenic vistas, both near and far, are spectacular.
- ii. The “Primitive” condition of the road/trail provides users a considerable challenge to both driver skills and vehicle capability.
- iii. The area geology is very interesting and unique.
 - 1. The salinity of Salt Creek
 - 2. The collapse of the salt dome on the valley floor
 - 3. Copper mining (the Copper Rivet mine)
 - 4. How the elevation changes the geology
- iv. Area history including:
 - 1. The McCarty Gang and cattle rustling
 - 2. Sewemup Mesa
 - 3. The Pace family ranch(es)
- v. Wildlife
 - 1. Chances of seeing elk, deer, or black bear are very good.

3. We ask that the BLM seriously consider the follow change to the 2013 RMP regarding the Pace Lake road/trail.

a. With the cooperation of the Manti La Sal National Forest, a long “Loop Route” could be established.

- i. By connecting the Pace Lake road/trail with an existing route at the southern boundary of the Sky Mesa Ranch (at the southeast corner of the National Forest) that eventually connects with the John Brown road, we would have an estimated 30-mile loop road.

We of the Jeeping community ask the BLM to consider changing the 2013 BLM RMP for managing the Pace Lake Road/Trail as an “Open” “*Primitive*” road/trail, allowing full-size 4-wheel drive, ATV, and Motorcycle uses to be the “*Primary*” recreational uses under the designation of SRMA.

The Calamity Mesa Loop Road/Trail

By Jerry Smith

Area V; 11.5 Rd; V921; V3122; V976; V528; V138; V432

1. Some history of the Calamity Mesa and trails/roads used by the public:

- a. The Calamity Mesa Loop Road/Trail basically begins and ends at the 4' x 8' yellow Uranium Warning sign along the 11.5 Mesa County road near the Arrowhead Camp and airstrip. From there it follows the 11.5 County road to a mid-level bench of lower Calamity Mesa overlooking the Blue Creek Ranch property. From there it goes north around a lower elevation of the west side of Calamity Mesa to the north side and then climbs back up to the warning sign to the east.
- b. This roughly 20-mile loop is an "unequaled gem of wealth" to the 4x4 community. Primitive Roads/Trails of this length and level of difficulty (Class 6+ or 7) are extremely unique and difficult to find in the entire U.S.

- c. In November of 2008, members of the Grand Mesa Jeep Club first traveled the Calamity Mesa Loop Road/Trail with extreme difficulty. The route had been closed to all motorized travel for several years (possibly up to 15-years) by numerous events of Mother Nature.
- d. In the spring of 2009, members of the Grand Mesa Jeep Club and Western Slope 4-wheelers of Montrose worked for two days to make the Calamity Mesa Loop Road/Trail open to use as a very "primitive" class 7 or 7+ road/trail.
- e. Every year since, the Grand Mesa Jeep Club has reopened the trail after the spring run-off.
- f. Normally, every two years requires several hours of brush trimming to keep the Gambel Oak and Mountain Ash from encroaching into the road. Every year there are new rocks and trees to remove from the road to keep it passible. Often, one or more washes require work to keep them open and safely passable.

- g.** The Grand Mesa Jeep Club, for their annual “Rock Junction” event has retained special event permits for the Calamity Mesa Loop Road/Trail and it is presently under consideration for the same again this year (2013).
- h.** The Grand Mesa Jeep Club is also currently considering the Calamity Mesa Loop Road/Trail for “Adopt-a-Trail” status.

2. Experience(s) to be expected:

- a.** *Many scenic vistas along this road/trail can literally be overwhelming.*

 - i.** The Blue Creek gorge and its confluence with the Delores River by itself is spectacular. Adding the view of Sewemup Mesa WSA as a backdrop enhances this view and the very tops of the La Sal Mountains are visible just beyond.

- ii. Looking up Salt Creek canyon from the elevated Calamity Mesa Loop road/trail is another awe-inspiring vista.
- b. The history of Calamity Mesa is primarily of the Uranium/Vanadium age. The Calamity Camp rebuilding is a clear look back on some of that history.
- c. The Calamity Mesa Loop is a very primitive road/trail... so primitive, we have named 12-obstacles. These obstacles are very close to “extreme” in difficulty and require great driver skills and a vehicle with better than stock capability. Everyone who has been over this road has come away with a sore face from smiling all day.
- d. There are numerous spur roads to old mine sites along the loop that are full of historical and cultural values.

e. Many of the spur roads also provide further opportunities for challenging driving as the roadways are full of obstacles.

1. We of the “Jeeping community” would ask the BLM to consider changing the 2013 RMP to manage the Calamity Mesa Loop as an “Open” *“Primitive”* road/trail, allowing 4-wheel drive, ATV, and Motorcycle uses to be the *“Primary”* recreational uses under the designation of SRMA.

The Calamity Mesa Airstrip road/trail

By Jerry Smith

V328; V668; V792; V791; V979; V985; V982;
V989;

Some history of the Calamity Mesa Airstrip road/trail:

- a. In September of 2009, Grand Mesa Jeep Club member Jerry Smith first explored this road/trail. The majority of the road/trail runs on the top of Calamity Mesa and is suitable for most SUVs with some high ground clearance. The only signs of use were some ATV tracks. The lower end of the road/trail drops down a canyon to the 11.5 Rd. (Calamity Mesa Loop). In the canyon, the road/trail crosses a wash several times. In this area, Gambel Oak had completely overgrown the road surface completely closing the route. The oak brush was cut and removed from the road surface and placed to act as erosion control. Once the

11.5 Rd is reached, any stock vehicles would be advised to return the way they came from.

- b. The Calamity Mesa Airstrip road/trail was included in the 2012 and again in the 2013 “Rock Junction” event BLM Special Use Permit.

A newly designated SRMA of the Calamity Mesa Loop should also include the road/trail from the airstrip on the top of Calamity Mesa that travels down the mesa top and eventually connects to the Calamity Mesa Loop road/trail on the 11.5 Rd.

- c. This Calamity Mesa Airstrip road/trail has several breath taking vistas including overlooking Flat Top Mesa, Little Maverick Canyon, the top of Sewemup Mesa, the upper La Sal mountain range just to mention a few.
- d. Though the top of Calamity Mesa is not as difficult, once on the Calamity Mesa Loop, the driver must either return the way they came from or be able to negotiate many of the very

difficult “Named Obstacles” of the Calamity Mesa Loop.

e. Because of the ease of access, the top of Calamity Mesa and the road/trail down to the point of entering the canyon would be a highly recommended area for “Quiet Users”, mountain biking, equestrians, and other motorized uses. The serenity and the scenery together are simply awesome. Much of the hiking, horse riding, or mountain biking would be easy to moderate on the mesa top making for an excellent experience.

f. We would ask that the BLM give serious consideration to revise the 2013 RMP/ TMP to include the top of Calamity Mesa in the SRMA for the Calamity Mesa Loop.

i. We would also ask the BLM give serious consideration to revise the 2013 RMP/ TMP so that in the SRMA, the top of Calamity Mesa be managed

with the possibility of single track hiking and/or bicycle trail(s) be established to provide less chance for user conflicts between motorized and non-motorized user groups.

Coal Canyon

By Jerry Smith

M140, M 145, M 261, M101, M164, M152, M170, M157

1. *History: Coal Canyon and its overlooks have been used for many years by the grand Mesa Jeep club.*
2. The Grand Mesa Jeep Club had a special event permit from the BLM for their "Rock Junction" its event in 2012.
3. The Grand Mesa Jeep club has an annual club run to the Palisade rim of the Coal Canyon trail in the fall.
4. This trail has been a favorite of many due to the prime vistas of the grand Valley and the town of Palisade.
5. One piece of this trail seems to have been omitted from the maps. Segment M 148 does not is not visible on current maps.
6. Routes M156, M162, M157, and M177, are marked administrative on all our current alternatives. These end near an overlook of Grand Junction
7. **We ask that the BLM consider changing all of Coal Canyon to "open to all motorized vehicles" on the 2013 Travel Management Plan.**

Glade Park to Gateway

By Jerry Smith

Q338, Q479, Q478

1. History: this road or trail begins at the end of DS Road at the border of Colorado/Utah. The vast majority of the actual trail is in Utah but crosses the border several times on its way down toward Gateway.
2. The Grand Mesa Jeep Club had a special use permit for the 2012 Rock Junction event.
3. This road/trail has been used for many years by the Jeep club and public. There are many Vista points along the way looking down toward the La Sal mountain range, Steamboat Mesa, and other mesas in the distance.
4. This road/trail is neither difficult nor rough and an SUV with high ground clearance can negotiate the trail with little problem.
5. **We ask that the BLM give serious consideration to leaving this Road/trail "Open to all motorized vehicles" in the 2013 Travel Plan.**

GJFO 2013 RMP and TMP Comments

1. While we support converting certain areas from “Open Travel” to “Restricted to Designated Routes”, we see a flaw in the transition process that the BLM has historically overlooked.

This “Process Flaw” has to do with the “behind-the-scene” way used by the BLM to determine which roads/trails/routes to close or to leave open. As the owners of the land and users of the roads/trails/routes, the public is never really given a chance for direct input into that process.

During the Scoping process, we were told NOT to be specific. It seemed then, as it seems now, that the BLM does not truly want “specific” comments from the public regarding the determination of specific roads/trails/routes. Being precluded from the entire process increases public frustration. Regardless of the BLM statements to the contrary, we feel we are being dictated to and our input does, at no time, actually mean a thing to the BLM.

We, the public users of BLM GJFO managed lands, roads, trails, and routes, ask that the BLM GJFO show true leadership by setting an example of involving the public directly in the determination of which roads, trails, routes, and areas will be “Open to Motorized

Travel” and which modes of Motorized Travel will be allowed on each of these roads, trails, routes, and areas in the 2013 RMP/TMP.

As the Draft RMP/TMP has already been released, we realize that this request is coming somewhat late in the process, but we believe that this request is still valid when you consider that the BLM is being subjected to rally/protests in front of their offices.

One way that this public input could be accomplished would be to utilize entities like the Grand Valley Trails Alliance as a central organization for generating these “public” lists.

The Grand Valley Trails Alliance currently has what is known as “The De Beque Working Group”. “The De Beque Working Group” is made up of a diverse group of people with very diverse interests in how we use public lands.

We have “Quiet Users”, Equestrians, Bicyclists, ATV users, Motorcyclists, and 4-wheel drive enthusiasts represented. These entities have been on field trips and in many meetings and have found that we have more in common regarding our wishes for management of Public Lands than conflicts.

**In the CEQ – Regulations for Implementing NEPA,
Sec. 1506.6 Public involvement states:
Agencies shall:**

- (a) **Make diligent efforts to involve the public in preparing and implementing their NEPA procedures.**
- (d) **Solicit appropriate information from the public.**

<http://documents.clubexpress.com/documents.ashx?key=W%2f3Ja%2fYe8AN1sVHXzNqaPFt%2b%2bW73Rb9%2bs0MKvc926jVpqaqf8zfrD9yb13CvBVKQcmqT5hMHv1106c%2b7z0ZzUo6dCeSeIG%2bpyQ6oSuTXI13GA1bqezEmJ1bFNXoBw6v1>

Executive Summary – Economic Contribution of Off-Highway Vehicle Recreation in Colorado

Much of the analysis was based on a previous study completed by Hazen and Sawyer in 2001 titled Economic Contribution of Off-Highway Vehicle Use in Colorado.

Households that Participate in Motorized Recreation in Colorado

The number of households that participate in motorized recreation has steadily increased since 2000. The most significant increase has occurred for dirt bikes and all-terrain vehicles (ATVs). The Colorado Division of Parks and Outdoor Recreation (DPOR) requires annual registration of off-highway vehicles (OHVs) which it defines as two- wheel, three-wheel and four-wheel vehicles. These vehicles typically are not licensed, and are primarily used on trails, routes, and forest roads.

Registrations for OHVs have increased by 145 percent between the 2000-01 season¹ and the 2007-08 season. DPOR also requires annual registration of snowmobiles and reported an increase of eight percent between the 2000-01 and 2007-08 seasons for this vehicle type.

The number of registrations was used in part to estimate the number of resident and non-resident households that likely participated in motorized recreation in Colorado during the 2007-08 season. The analysis showed that over 180,000 resident households likely participated in some sort of motorized recreation in the 2007-08 season in Colorado and nearly 30,000 non-resident households traveled to Colorado to participate in motorized recreation.

Expenditures Made by OHV Enthusiasts

Motorized recreation enthusiasts contribute to the State's economy by purchasing vehicles, making expenditures while on recreational activity trips (day and overnight), spending money to operate and maintain vehicles, purchasing other accessories needed while riding (clothes, safety equipment), and making other expenditures for items that support their activities (food and fuel, etc.). The analysis showed that in the 2007-08 season, motorized recreation enthusiasts spent \$784 million related to this activity in Colorado.

Direct Labor, Income, and Tax Contributions

The economic contribution made by motorized recreation enthusiasts support businesses throughout the State. Tourism and recreation is a significant industry in Colorado in terms of the number of jobs created by businesses that support these activities and the income earned by those employed in these businesses. These businesses range from small "mom and pop" operations in rural areas to medium

and large firms located both within and outside the State.

The \$784 million in gross sales resulting from motorized recreation generated over 10,000 direct jobs and \$294 million in labor income during the 2007-08 season. Other components of gross sales are other property type income (e.g. rents on property) and indirect business taxes (e.g. excise taxes, property taxes, fees, licensing, sales taxes paid by businesses), which were \$76 million and \$91 million, respectively.

Additional Economic Activity

The direct expenditures made by motorized recreation enthusiasts have an additional effect by generating indirect and induced (downstream) economic activity (often known as multiplier effects). The downstream economic effects of motorized recreation that come from the initial expenditures made by motorized recreation enthusiasts, which are basically the spending of indirect businesses (those that support the direct businesses, e.g. laundry services for hotels) and households (employees that earn their living either in the direct or indirect businesses) resulted in \$243 million in downstream gross sales, 2,039 additional jobs, and \$76 million in additional labor income. Also, over \$54 million in other property type income and \$17 million in indirect business taxes were generated.

Total Economic Contribution

The total economic contribution of motorized recreation for

the 2007-08 season can be described as follows. Motorized recreation enthusiasts were estimated to have generated over \$706 million in total direct gross sales for motorized recreation throughout the year. This direct spending generated an additional \$243 million in downstream gross sales due

to additional economic activity, or \$949 million in total gross sales.

The economic contribution can be further described by evaluating the components of total gross sales. For instance, motorized recreation in Colorado is directly or indirectly responsible for over 12,000 jobs and \$370 million in labor income. Total gross sales also include \$129 million on Other Property Type Income and \$107 million in Indirect Business Taxes.

The economic contribution was broken down by OHVs (all-terrain vehicles [ATVs], Dual Sport/dirt bikes, four-wheel drive vehicles [4-WDs]) and Snowmobiles. According to gross sales, OHVs contribute 89 percent of economic contribution while snowmobiles contribute 11 percent.

ES.6 Total Economic Contribution of Motorized Recreation in Colorado during the 2007-08 Season (Direct, Indirect, and Induced)

Economic Contribution Category	OHVs	Snowmobiles	Total Economic Contribution

Total Gross Sales	\$846,253,128	\$103,293,768	\$949,546,896
Components of Gross Sales a			
Jobs	10,838	1210	12,048
Labor Income	\$329,386,161	\$41,193,157	\$370,579,318
Other Property Type Income	\$116,4631,479	\$13,141,096	\$129,572,575
Indirect Business Taxes	\$93,981,967	\$11,894,459	\$107,573,564

^a Note: Figures for labor income, other property type income, and indirect business taxes are components of gross sales and thus cannot be added together. Adding all dollar figures in this table would constitute double counting of economic contribution.

Economic numbers for the RMP/TMP

<http://www.outdoorfoundation.org/pdf/ResearchRecreationEconomyStateColorado.pdf>

<http://documents.clubexpress.com/documents.ashx?key=M2YgtVnK9KF7ZskbzPhD10W%2fbazIgebslFVhB3dWKIGIAubYSKHBarDsuQwTxf4C9niR2dY5bVc%3d>

Colorado Parks & Wildlife “State Trails Program”
Trail use is the number one recreational activity in

Colorado. Each year people use Colorado's trails over 40 million times. Roughly nine out of ten Coloradans (87%) report they use trails and about half (48%) say they generally use trails one or more times a month. State, federal, municipal, regional and cities provide extensive trail opportunities to the public. These groups work together to offer connecting trail opportunities, enabling people to bike, hike or walk around Colorado. Trails are also the top outdoor "gateway" activity across the United States.

In 2006, the Outdoor Industry Foundation reported that Colorado's outdoor recreation generated more than \$10 billion annually to the state economy. Trail recreation makes up a significant, yet largely unrecognized portion of that total.

Health care professionals increasingly acknowledge the significant benefits of regular outdoor activity. Eighty percent (80%) of Coloradans say they have convenient access to trails. Trail recreation, including hiking and biking, offers valuable opportunities for healthy life styles.

Colorado's OHV (Off-Highway Vehicle) Program funding comes principally from annual OHV registrations and use permits. In 2011, the Program issued 160,000 OHV registrations and use permits. This enabled the OHV Program to award over \$4 million in OHV grants for on-the-ground trail improvements, trail maintenance, rider education and compliance programs

We, the public and the users of the public lands, roads, trails, and routes, ask that the BLM GJFO show the nation, the State of Colorado, the entire BLM, the Department on the Interior, and the local residents who have the most to gain or lose, leadership in the management of our local BLM GJFO managed lands by setting an example of how the BLM can truly work with the public regarding the final determination of whether specific roads, trails, routes, or areas should be open to motorized travel and to which modes of travel that will be allowed on each road, trail, route, or area.

Roads and Trails ARE A Major Part of Our National Heritage and Culture

Roads and Trails on public lands are too often are not given the status that they deserve.

Many of these roads and trails were developed as a direct result of RS 2477 as a way of opening up the western U.S. to development and have existed without any significant detriment to the environment for in some cases, over 100-years.

Sec. 101 [42 USC § 4331] (b) of NEPA states:

- 1. fulfill the responsibilities of each generation as trustee of the environment for succeeding**

- generations;
2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
 3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
 4. preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
 5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

“Sustained Yield” should include “Sustained Recreational Use”

A Sustained Yield of Recreational Use would not include the closure of an existing, traditionally used resource, (Roads, trails, route systems, and areas).

From a “Recreational Use” stand point, roads, trails, routes, and areas “traditionally used” for recreation are a “Sustainable Use” of an existing

“Resource”. This carried forward would mean that roads, trails, routes, and areas provide a “Renewable and Sustainable Resource” if left unchanged or designated “Open” to the same traditional uses.

Recreation is a “Traditionally Used” “Renewable Resource”. But it is only renewable if the recreating users may obtain the same opportunities for the same level of recreation (the same level of access to the same points of travel to re-create the same experiences).

Most roads, trails, route systems, and areas under the BLM GJFO management have existed in excess of 50-years. Many are over 100-years old. The public has had access to and has traditionally used these roads, trails, route systems, and areas from their initial existence to the present without a significant negative cumulative effect to the environment.

Nowhere in the DRMP/DTMP does the GJFO identify a sudden need for the extreme number of road, trail, route system, and area closures with the exception of closing areas currently managed as “Open” to all uses.

We support the changes from the “Open” concept to that of “Limited” to “Designated Routes”. It is the “Designated Routes” left open to motorized uses where we differ.

Too much emphasis has been given to “closure” of existing roads, trails, routes, and areas with zero justification or need for these closures. The loss of trail mileage and acreage available from converting the areas currently managed as “Open” to “Limited” represent a majority of the losses.

The closures outside of the “Open” areas being converted are where the public in general has a problem with the 2013 GJFO RMP/TMP.

We the Public, find “Administrative” road/trail closures unwarranted, unnecessary, and unwanted. “Administrative” road/trail is not defined in the Glossary.

In Volume III- Appendix M – (2.4) Outcomes-Based Recreation Management

In Volume III- Appendix M – (2.4) Outcomes-Based Recreation Management

It states:

“priority is given to resource dependent recreation. Resource dependent recreation is that which can only be done where the natural resource or setting exists.”

OHV use of public lands cannot be achieved without Designated Roads, Trails, or Routes open for “Full-Size”, ATV/UTV, and/or Motorcycle uses. Outcomes-based Recreation Management for OHV users must include roads, trails, and routes and “Primitive” roads, trails, and routes to fulfill the “resource dependent recreation”.

GJFO RMP TMP 2013 Economic Comments

GJFO DRMP/TMP Volume II pg. 4-422 -- Impact on Recreation

1. Estimate of Recreational Use

a. In this paragraph it states: “Mechanized activity consists primarily of mountain biking while non-mechanized activities include hiking, running, bird watching, dog walking, should and shooting etc.” No mention of what mode of travel is used to access public lands for these uses. Common sense dictates the overwhelming number of these users arrive in some sort of motorized travel. Without roads and/or trails available, even these “quiet” users will be much more limited in their access to their chosen uses of public lands.

2. Further into this same paragraph, it states: “the proportion of mechanized and non-mechanized visitors from outside the region was calculated from the 2009 surveys. Due to the low response rate from off-highway vehicle (OHV) users, an alternative method was used to estimate the proportion of motorized visitors from outside the region. Motorized users were assigned the same proportion of out of region visitors as were non-motorized visitors.

a. We believe that this method of estimating the numbers of OHV users to be flawed in too many ways to count. Judging from the typical numbers of mountain bikers seen at the trailheads along Monument Road at the

Tabeguache Trailhead, along the Kokopelli trail, and in the desert north of Fruita alone would lead one to believe these numbers to be entirely understated.

- b. As for OHV uses, even quick surveys of Billings Canyon and 21 Road (Hunter Canyon) Jeep trails would lead one to believe that there is considerably more usage from “outside” users. These two trails have a national recognition that draws “outside” users nearly every day of the year.
 - c. If these estimates are as skewed as we believe, too many decisions regarding road and trail closures on the 2013 RMP/TMP have been made using poor data.
3. Near the end of this same paragraph it states: “finally, spending profiles were calculated for motorized and non-motorized users from the 2009 surveys and from similar surveys conducted on BLM land in Routt and Moffat counties (Loomis, et al.).
- a. The Grand Junction Field Office managed area is in so many ways completely different from Routt and Moffat counties, it is completely unbelievable that any comparison would, or could be made. The GJFO is known nationally as a very unique BLM field office. The GJFO must deal with much more diversity of user groups than any other field office. Therefore, comparisons to Routt and Moffat counties are ridiculous. Routt and Moffat counties have no cities with populations remotely

comparing to Grand Junction. For that reason alone, recreational uses and socio-economic numbers would be very different. The number of available hotel rooms and other amenities in Grand Junction compared to that of Routt and Moffat counties makes these comparisons irrelevant. With access to sporting good stores such as Cabela's, Sportsman Warehouse, and several other smaller sporting goods stores in Grand Junction, the GJFO area would draw considerably more outside OHV and other user groups just for the shopping opportunities alone. The proximity of BLM lands and the number of current trails available close to Grand Junction with all its amenities, make it a hub for "outside" recreationists of all user groups. Taking all of this into account, the gross amount of road and trail closures so close to Grand Junction will have a very detrimental affect to the local economy.

- b. The failure of the GJFO RMP/TMP to properly value recreational activity has altered the basic direction of the entire document as many decisions regarding routes are purely a balance of the economic benefit of the route against the competing interests that would benefit from closure.
- c. Alternative C in table 4 – 63 shows having the fewest visitors of the four alternatives. This alternative has the most closures of roads and trails and therefore

demonstrates that these overwhelming closures will have a significant impact on the local economy and employment. If our assumptions regarding the numbers used by the BLM in this draft RMP/TMP are correct, a much more significant negative impact would be demonstrated in Table 4 – 63 in all four alternatives.

- d. To quote the Colorado Office of Economic Development and International Trade; "In addition to our winter recreation offerings, the state offers numerous opportunities for hiking, backpacking, camping, visiting state and national parks, biking, rafting, boating, mountain climbing and hunting." "Outdoor overnight trips equate to 22 percent of the total overnight visitor spending, ranking Colorado 8th in the country for outdoor overnight trips. Colorado is an international hub of outdoor recreation, with a concentration of outdoor industry companies estimated to be about 12% of the national total. The Outdoor Industry Association found that the outdoor industry accounted for over 107,000 jobs and \$10 billion annual economic output in Colorado alone."

Source:

<http://www.advancecolorado.com/key-industries/tourism-outdoor-recreation>

- e. COHVCO has identified that OHV recreation provides over \$1 billion in annual economic contributions to

Colorado. Source: 2008 Colorado Off Highway Vehicle Coalition report entitled *Economic contributions of Off Highway Vehicle recreation in Colorado* prepared by the Louis Berger Group.

http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2009.pdf

At the above URL, the USFS in: Table 15. Spending data associated with National Forest land recreation, by Spending Segment, for FY2005 - FY2009.

	Non-Local Segments			Local Segments	
Day Use	Overnight on NF	Overnight off NF	Day Use	Overnight on NF	Overnight off NF
\$73.16	\$236.75	\$605.93	\$37.03	\$171.47	\$195.14

Considering that gasoline prices are nearly double 2009 prices, these numbers are low by today's standards. Comparatively, this makes most of the GJFO 2013 RMP/TMP economic data clearly useless.

A typical day in the Colorado BackCountry costs between \$40 and \$65 (minimum), if one doesn't travel far from home. This doesn't take into account any expenditures for food, drink, vehicle maintenance and upkeep, replacement of worn or broken parts, maps, new or replacement clothes, photo development, ice, and other associated costs.

No research we have seen on the internet even comes close to the low economic numbers in the 2013 GJFO RMP/TMP.

Table 5. National Forest Visitor Spending Profiles by Trip Type Segment and Spending Category, \$ per party per trip

<http://www.fs.fed.us/recreation/programs/nvum/NVUM4YrSpending.pdf>

At the above URL, the USFS in 2003 found that “Non-Local Segments” spent \$51.60/day not including an overnight; \$161.25 if staying overnight on the forest; and \$245.25 if staying overnight not on the forest.

For “Local Segments”, day users spent \$32.85/day; \$124.49 if spending the night on the forest; and \$116.14 if overnighiting not on the forest.

Considering that gasoline is over double the number used in 2003, it is quite obvious that numbers used in the GJFO RMP/TMP are seriously undervaluing recreation. **We believe that the GJFO has made an error of major proportions in their economic efforts in the GJFO RMP/TMP.**

1. NEPA Sec. 101 [42 USC B 4331] (b) (4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;

We submit that because of the age of many, if not most of the roads, trails, and routes that the 2013 GJFO RMP/TMP proposes to close to

motorized use, the GJFO is NOT “preserving important historic, cultural, and natural aspects of our national heritage.”


The public, for recreational and/or commercial needs, has consistently used these roads, trails, and routes since they came into existence. *Some of these roads, trails, and routes have existed over 100-years and have seen significant travel with little to no detriment to the surrounding environment.*

Even though the BLM is no longer held to recognize the RS2477 law, many of these roads, trails, and routes would likely be eligible for “Historical”, “Cultural”, and “National Heritage” protection if the RS2477 research of each of these roads, trails, and routes were pursued and proven.

As “highways” used to “open the American West”, many of these historic roads, trails, and routes absolutely deserve as much protection as any *pictograph or Indian Cultural sites whether or not RS2477 is applied to them or not.*

Many of these roads, trails, and routes have histories of family use for recreational uses such as annual hunting access, camping, OHV, and other pursuits. *In some cases, hours of undocumented maintenance have been done to these roads, trails, and routes so that these pursuits might continue. Many of these “family pursuits” have personal “heritage” and “cultural” meanings to members of the public.*

By continuing access to as many of these roads, trails, and routes by the recreating public as possible, the BLM will be “maintaining, wherever possible, an environment which supports diversity, and variety of individual choice.” Unnecessary closure of roads, trails, and routes is the complete opposite. If, as we believe, recreational experiences are “renewable resources”, closure of roads, trails, and routes is “depleting a resource” of historic, cultural, and national heritage values”.



Withdrawals 5k acres
gjfo_rmp@blm.gov
BLM _ GJFO RMP
2815 H Road
Grand Junction CO 81506

Dear Sirs and Madams:

We appreciate the opportunity to comment on the DRMP and take the responsibility of reviewing the DRMP for compliance with the National Environmental Policy Act, CEQ regulations, the Federal Land Policy and Management Act, and BLM regulations with the utmost seriousness.

We would like to point out a misinterpretation of the regulations we found in Appendix M, Evaluation Process. The DRMP cites the 43CFR8342 regulations.

In particular, we notice that the regulation says,

the minimization of conflicts among various uses of the public lands; and in accordance with the following criteria:
impairment of to prevent wilderness suitability.

Here the regulation is very vague; it should properly be assumed this only applies to Wilderness Areas and WSA's. However, it appears that BLM has expanded its meaning to include new areas outside WSA's at random throughout the planning area, and to place buffers around existing WSA's, and to expand existing WSA's.

For example, referring to the Travel Management maps:

In Zone V, BLM has imposed a no motorized zone at Juanita Arch with no rationale given. In the north sector of Zone V east of Highway 141 another large non-motorized area is created, again no rationale or analysis provided.

In Zone V in Alternative C BLM has created a large no motorized zone in Tenderfoot Mesa, again with no rationale given.

In Zone U, Alternative B, BLM creates a no motorized zone which approximately triples the size of the WSA, with no statutory authorization cited. There is no analysis or rationale provided.

In Zone J the WSA boundaries are expanded. No analysis or statutory authorization is cited for these expansions.

In Zone M, almost the entire zone is changed over to non-motorized. This is the scale of closure that requires Congressional approval¹, yet no analysis or statutory authorization is cited for this expansion.

In Zone P BLM has made a large part of the Bangs Canyon SRMA non-motorized, which is in conflict with the existing plan. BLM has stated in Chapter 1 that existing Decisions under current implementation would not be changed by this RMP.² The Bangs Canyon plan has been through IBLA and has undergone its own revisions as circumstances required. BLM has provided no analysis or rationale for making a major change to that Plan in the DRMP.

These areas are created throughout the planning area, we have cited only a few examples. Perhaps BLM wishes to make the areas less accessible, yet BLM has created so many of these and they are often so large, that a rationale or statutory authorization for the changes is necessary in the Travel Management analysis. BLM provides none, which causes the actions to appear arbitrary (without reason, unwarranted by the facts).

The second part of 43CFR8342' could possibly give a clue, from the 43CFR:

c) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

This may explain some of the closures; for example reviewers could guess that the Zone M closure is to create an exclusive horseback riding area³, yet others do not seem to fit any rationale. BLM may be proposing other, new activities that are not disclosed, which BLM perceives would conflict with motor access. Perhaps BLM expects to "create" or do what is called "manufacture" wilderness quality areas by cutting off human access. This is unlawful because no legal activity can be excluded without proper and thorough rationale, and, according to size, Congressional approval.

In sum, all the above actions must be considered withdrawals⁴ and the proper analysis and statutory authorization must accompany such withdrawals. BLM has not done this.

¹ FLPMA Section 204.

² Item 12 on DRMP page 1-14

³ Its size still requires Congressional approval (5,000 acres in aggregate)

⁴ FLPMA Section 204.

The resolution to this comment is obvious: either remove the restrictions or follow the proper legal steps to withdraw these lands, and disclose the real intended use as instructed in the FLPMA Section 204. There are many of these proposed withdrawals throughout the planning area, so this may require a supplementary analysis. In the case of the Bangs Canyon revision, please remove the withdrawal and continue to implement the existing Decision, known as the Bangs Canyon Plan, adhering to that Plan's Purpose and Need as stated in that Plan.

Thank you for your attention to this matter.

Defective NOI
gjfo_rmp@blm.gov
BLM _ GJFO RMP
2815 H Road
Grand Junction CO 81506

Dear Sirs and Madams:

We appreciate the opportunity to comment on the DRMP and take the responsibility of reviewing the DRMP for compliance with the National Environmental Policy Act, CEQ regulations, the Federal Land Policy and Management Act, and BLM regulations with the utmost seriousness.

We would like to report an error in the scoping process used to develop the Planning Issues and Alternatives.

ERROR: The Notice Of Intent (NOI) of October 14, 2008 presented no proposal for the public to respond to during the scoping period. At 40 CFR 1508.22 Notice of Intent we learn that;

“Notice of intent” means a notice that an environmental impact statement will be prepared and considered. The notice shall briefly:

(a) Describe the proposed action and possible alternatives. (emphasis added)

The Grand Junction BLM's NOI did not contain any proposed actions other than the intent to prepare an Environmental Impact Statement. The NOI simply provided a list of the activities and resources that it would cover (with no definitions or proposals included). It does not appear that this is what CEQ meant by instructing the agency to "describe the proposed action."

At 40CFR 1501.7:

"There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action." (emphasis added)

The clear implication here is that there must be a proposal for the public to consider and provide feedback on. The Grand Junction BLM NOI contained no such proposal. The responding public had no idea what the BLM was considering, or what might be changed, or how BLM proposed to address these activities and resources in the RMP revision.

Further, in the CEQ 40 Questions, in answering the question about early scoping CEQ reveals an important clue about the importance of providing a proposal of some kind so that the public can participate effectively. At CEQ 40 Questions, question # 13a:

"The regulations state that the scoping process is to be preceded by a Notice of Intent (NOI) to prepare an EIS. But that is only the minimum requirement. Scoping may be initiated earlier, as long as there is appropriate public notice and enough information available on the proposal so that the public and relevant agencies can participate effectively " (emphasis added).

In this answer to question 13a we learn the purpose of having a proposed action in the NOI. The idea is that the public can only participate effectively if it has information about what the BLM is proposing to do.

Further, in the two subsequent "Travel Management" scoping meetings, there were no proposals put forth. The public was asked to check the BLM route inventory for accuracy and completeness. A second meeting had to be scheduled because the first meeting occurred during a time when most of the areas of the planning area were not accessible, so the public was unable to check the BLM inventory. We commend the BLM for opening up the second meeting, yet there were still no proposals offered.

BLM sent out several newsletters, called the "Grand Junction RMP newsletter" and mailed to interested parties. The closest BLM ever came to describing any proposals was to say that it had developed four alternatives. A was No-action, B was balanced human and natural resources, C was to emphasize non-consumptive use, and D was for commodity production and public opportunities. There was nothing specific and there was no further explanation about any of them, nor were any maps provided.

In other words, the BLM proposals that we see now has come as a complete surprise to the public. In all action alternatives, major cutbacks in general public access are proposed, and major reductions to the single biggest attraction in the planning area (and possibly in the entire Grand Valley) are set forth. Had the public known anything about these proposals during scoping, the BLM would have received far more relevant responses during scoping.

We have a strong hint that BLM did not want public participation. On two separate occasions Mr. Brandon Siegfried submitted FOIA requests¹ to find out what the proposed Travel Plan action would be, and BLM refused to answer his questions. This is an incredible breach of trust and regulation, as the BLM proposals are supposed to be furnished to the public once the NEPA

¹ June 7, 2012 and August 22, 2012. Mr. Siegfried requested:

"A current detailed list of all motorized and non-motorized Roads/Trails/Routes that are to be closed or being considered for closure that are under the management and direction of the Grand Junction, CO field Office. This would include Mesa County, Garfield County, and any other counties managed or directed by the Grand Junction BLM Office."

process has started, and the CEQ intends for an early and open public review of the proposals.² Furthermore, CEQ strongly and repeatedly encourages full public participation during the process, not after the draft RMP is done, only to find out in adversarial comments that the public is opposed to the proposal. Bear in mind that BLM was working on this revised RMP for four years prior to his requests, during which time BLM would not reveal any information about what the proposals might look like.

To summarize, in this case the public could not participate effectively because there was no information available. The BLM never revealed its proposals to close down general public access and concentrate visitors in tiny areas, to which the BLM "marketing" would direct all visitors. The public had no opportunity to participate effectively.

Now, after four-plus years of work, the DRMP is complete, but with a major flaw in its foundation.

Resolution: This a serious defect in the very foundation of the DRMP. It would not be quite such a problem if BLM was proposing well-reasoned changes. However, BLM is proposing to close off more than 65% of general public access, with little to no justification or rationale. BLM is proposing to take a natural feature that attracts over 250,000 people per year and cutting it in half--essentially dismantling it. BLM is creating large swaths of "non-motorized zones" for no apparent reason. BLM is expanding WSA boundaries without any statutory authorization. All these changes are discussed in detail in separate comments. These stunning changes were never disclosed at any time during scoping or during the planning process. Every proposal in every discipline (land allocations and travel planning) is affected by this error. General public access is the defining issue in these proposals and many of the land allocations are clearly designed to facilitate the shutdown of general public access. It is likely that BLM will have to re-scope the RMP and start over. In its new effort, BLM must provide full public disclosure of, and appropriate rationale for its proposals, so that the public is able to participate effectively.

Thank you for your attention to this matter.

² 40CFR1506.6 (e) "Explain in its procedures where interested persons can get information or status reports on environmental impact statements and other elements of the NEPA process." (emphasis added) in other words, a FOIA should not have been needed; BLM is required to make the process as transparent as possible and these requirements are repeated frequently in various forms throughout the CEQ regulations. Actually denying to answer the question in the FOIA was an egregious violation of the letter and the intent of the CEQ regulations.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I am pleased to see that the county has listened to the input of the groups affected by the RMP.

My husband and I moved to G-1 a year ago from MA for the wonderful recreation opportunities. We have been very upset with the RMP that was proposed.

We belong to the Grand Mesa Jeep Club and have enjoyed exploring the beautiful areas that are surrounding the Grand Valley. I am pleased to see that the county is stepping up to save the areas we love to travel in.

Since moving here we have already made many new friends through our club and enjoyed the wildlife and history that we can get to with our Jeep.

We have also shared these experiences with

Comment deadlines:

Mesa County - 12 June (mclairange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional):

Wendy Barton

E-Mail/Phone:

wendyhbarton@optimum
11

friends from back east. This is an example of the economic impact that our treasured lands provide.



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

The GJFO draft RMP does not accurately quantify the motorized users contribution to the economy of the County. The RMP assessment is woefully low. Here is a fairly average example of the economics of buying and owning one new Jeep for a 10 year period. The assumption is buying it new in 2012 and then selling it in 10 years for half of the original purchase price. The case is real, it is my Jeep, and I have all the numbers. My cost of ownership if I just let the Jeep sit in the barn for 10 years is \$10.00/day every day for 10 years. That is all money that has and will go into the County economy. That figure has no finance charges in it because it was a cash purchase. The Jeep is totally for recreation and is not used for day-to-day transportation. I also have two dirt motorcycles and two ATV's purchased in Mesa County also a travel trailer purchased in Mesa County and a one ton truck purchased in Montrose.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)
BLM - 24 June 2013 (gifo_rmp@blm.gov)

(over)

Name (optional): Robert N. Janowski jr

E-Mail/Phone: janowski bob@ad.co
970 361 1721

Compare these type of motorized recreation contributions to the economy to the contribution from a hiker or mountain biker and you see that the economy contribution from motorized is very, very large compared to all quiet users.

~~BT~~
I request that the County formally connect to the BLM that they have poorly assessed the road closures effect on the County economies. If I had wanted to live where there is no public land and the government restrictions are severe I could have stayed in Texas or New Jersey where I once lived.

BT Jang



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

THE "BEST CASE" SCENARIO UNDER
THE PROPOSED RMP AFFECTING FULL SIZE
MECHANIZED VEHICLE SEEM TO BE MUCH
TOO AGGRESSIVE AS IT REDUCES AVAILABLE
TRAILS FOR THIS RECREATIONAL USE BY 60%.
THE OVERCROWDING AND THE IMPACT TO
REMAINING TRAILS WOULD BE HEAVY.

~~THE~~ IT APPEARS THAT NON-MECHANIZED USERS
ARE BEHIND THIS PUSH AS THEY DON'T WISH
TO SHARE PUBLIC LANDS WITH "DIRTY" MOTORIZED
VEHICLES. I AM A JEEPER, AND I AM ALSO
A HIKER. I CAN HIKE A DIFFERENT TRAIL IN
MESA COUNTY EVERY DAY OF THE MONTH AND
NEVER SEE A MOTORIZED VEHICLE. I DO NOT
WISH TO HAVE VISITOR PEOPLE, WHO MAY BE
HEALTHY ENOUGH TO HIKE LONG-DISTANCES
RESTRICT MY ABILITY TO ENJOY PUBLIC LANDS

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Vicky Murphy

E-Mail/Phone:

970-266-1463

VickyCANNMURPHY@
GMAIL.COM

THERE ARE 3 TRAILS I ENJOY SPECIFICALLY AND WOULD BE VERY SAD TO LOSE, DILD, COON HOLLOW, AND BILLINGS CANYON. I AM A MEMBER OF THE GRAND WEST JEEP CLUB WHO IS CELEBRATING THEIR 51ST ANNIVERSARY THIS YEAR. WE HAVE BEEN RECREATING AND RESPONSIBLY ENJOYING AND MAINTAINING THESE ROADS FOR 1/2 A CENTURY. THESE ARE ROADS, NOT VIRGIN MEADOWS. MORE DUST BLOWS IN FROM UTAH THAN WE GENERATE DRIVING DOWN THE ROAD. IN THE DECADES THAT THESE ROADS HAVE EXISTED WILD LIFE HAS FLOURISHED. THE "GREEN AGENDA" IS INTOLERANT OF OTHER WAYS OF RECREATING AND LIVING.



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I whom this may concern, My family and I do not want any more road closures! There are too many closures at this time. I am a disabled Veteran and so is my father in law and if there are more road closures it will be even harder for us to get around! Vested interest Routes:

Zone W - ALT (A), Zone V - ALT (A), Zone U - (A), Zone Q - ALT (A), Zone P - ALT (D), ZONE O - ALT (A), ZONE N - ALT (C), Zone M - ALT (A), Zone L - ALT (A), ZONE K - ALT (A), Zone J - ALT (A), Zone H - ALT (A), ZONE G - ALT (A), Zone I - ALT (A), AND ZONE F - ALT (A).

We want and need our public lands open!
ANY more questions please call me: 970-773-3003
BARBARA TARDIF.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): BARBARA TARDIF

E-Mail/Phone: 970-773-3003



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I'm a 58 yr old widow. My husband loved to ride the ATV trails in Mesa County to enjoy and get close to Sed's Country. You see, he was disabled and unable to hike the back country he loved so much as a young man. It was to retire in November 2012 and join him on the trail rides he loved so much. Sadly he passed away in May of 2012 and I never had the opportunity. I'm retired now and have decided to go on my own now and see these trails. I've joined a club of wonderful people who will show me, on club rides, what my husband will never be able to do. I'm sad to learn that BLM is wanting to close many of the trails that he once roved. Please don't let BLM use their plan and drastically reduce trails but instead leave it as is or at least adhere to a combination of Plan A & plan B. It would mean alot to me.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: 970.216.9571



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Public land needs to be left open for ALL people to be able to access & enjoy. We have a beautiful country & it should be able to be used & accessed for all not just a few.

Sincerely,
Rob Peckham
Rob Peckham

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I totally and completely oppose any closures of public access to any roads, trails and/or other means of transportation to our open areas. Management of public land is not to the discretion of bureaucrats. Once access is closed, human activity to those areas is nearly impossible. We have a right to enjoy and develop those areas as we (the collective whole) deem fit. The proposed plan is unambiguous, the studies inconclusive and it looks to be intrusive into the rights of the local people and economy. The land has historical, economic and recreational benefits that far outweigh ~~the~~ ^{the} environmental impacts. To close any access, I propose ~~these~~ ~~studies~~ be conducted in each individual area ~~to~~ ~~research~~ instead of as a whole and terms of the travel management plans need to be well written and clearly defined.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Kelly Woodruff

E-Mail/Phone: kwkelly94@gmail.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

*We appreciate you expanding
our vested interest routes
in Mesa County and
allowing more to be added
in the future*

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): *Jody Bowman*

E-Mail/Phone: *jody.bowman@mesa*
15529
Mesa
Co.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I appreciate you trying to keep more trails open and also repairing areas that need it.

I think that we need to keep as much land open as possible. If we have no recreation then people become bored and start doing stupid things.

So please continue allowing us open areas to play and enjoy however we want to, either by jeep or by ATV's and even motorcycles.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Brenda

E-Mail/Phone: 970-417-8168



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I WOULD LIKE TO SEE PUBLIC ACCESS MAINTAINED FOR ALL COUNTY VESTED INTEREST AREAS AND VESTED INTEREST TRAILS. I WANT THIS FOR ECONOMIC REASONS. THE REGION IS STILL SUFFERING ECONOMIC TROUBLES, AND SHUTTING OFF ACCESS WILL HARM THE ECONOMY FURTHER.

I WOULD LIKE TO THANK THE BOARD OF COUNTY COMMISSIONERS FOR THEIR WORK AND ENCOURAGE THEM TO KEEP UP THE FIGHT.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): KEVIN MCCARNEY

E-Mail/Phone: kmccarney@prodigy.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Good job mesa county! I think we should keep ~~most of~~ all the trail open. I spend my time up 21rd and know people come from all over to do this trail from extreme buggies to lifted jeep and everyone has a good time. I know the jeep club I am in has repeatedly tried to adopt this trail and I am certain that would fix all of the BLM's concerns about the area. Many thanks and keep it up.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Jason Crick

E-Mail/Phone: jcrick@SLB.co.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

~~the~~ I appreciate the county
expanding our vested interest routes
& vested interest areas for future
generations.

This will protect our local economy
and hunting heritage

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Brandon Sigfried E-Mail/Phone: you have it.
☺



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

THE PEOPLE of this county (Mesa) deserve direct representation and local control of our own lands. I support our County Commissioners lawful actions to control our land and expand access + expand vested interest routes.

To you who is reading this letter: You are a public servant, your salary is paid for by me and the taxpayers of this county. I ask you to read American Lands Council website, the work of Utah Rep. Ken Ivory, and why ALL of this land that the BLM is trying to close lawfully belongs to the people of Colorado State Colorado and should be under state control.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Jeff McCloskey

E-Mail/Phone: jeffmccloskey@Yahoo.com

970-234-3334



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

As a member of the Grand Mesa Jeep Club Board of Directors and the Land Use chairman (Western District) for the Colorado Association of 4wd Clubs, I am in complete support of the Mesa County Vested Route Inventory both from the desire to keep our Recreational Roads & Trails open and for the opportunities it affords the community Economically and Socially to keep Recreation strong in the area. We work hard to maintain many of these roads and trails with hours of volunteer work every year and feel that Mesa County is showing they support the same values.
Lead-on Mesa County - and thank you

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Jerry Smith

E-Mail/Phone: onejerry.smith@gmail.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Mesa County has world class deer and elk and the loss of access will impact wild life management and JPW revenues. Many out of state hunters won't come here to hunt
I would keep 27 1/4 Road open past the gun ranges to access the historic Carpenter mine area.

Supposedly public lands are owned by the public not to be taken away (stolen) by the manage-mongers in the Bureocracy. This involves the "life, liberty and pursuit of happiness" in the Bill of rights.

If The BLM has to maintain management and access roads-^{administration} ~~but~~ will they allow, foot and bicycle traffic but not motorized use?

"This is not the country I fought for." was expressed to me at 3:58 PM on 6 June 2013 by a patient in my office.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I have grave concerns that with the massive road ^(closures) closures and generalized motorized access that the risk and threat of wild fire suppression and control will be compromised or reduced to the point that much of our county will be open to damage and loss that will threaten public and private ~~and~~ ~~loss~~ properties, and public ~~use~~ ^{safety}.

Private property access and convenience are at issue here.

Ranching leases will be threaten due to loss of access. economic loss.

The actual miles accrued by hikers is a small percentage of that accrued by motorized mileage. But hiking is a real need and consideration.

motorized recreation from off road two and four-wheeled has a massive economic impact and public benefit

The management by BLM for the past 20 years has not caused any catastrophic problems, uncontrolled erosion, air quality issues or man caused fires. The death rate for off road vehicle ~~use~~ use is much lower than our public road and highway traffic death rate.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

MESA COUNTY ALREADY HAS LIMITED
ACTIVITIES TO DO SO TAKING AWAY
BLM LAND THAT HAS BEEN OPEN TO
THE PUBLIC FOR THE PAST CENTURY IS
JUST ASKING FOR THE COUNTY TO
GO FARTHER INTO THE # OF DRINKERS,
DRUG USERS, AND UNDERAGE PARENTS.
I HAVE PERSONALLY SEEN A LARGE
NUMBER OF ADOLESCENTS RESORT TO
ALCOHOL, DRUGS, AND UNSAFE SEX DUE
TO A LACK OF OUTDOOR ACTIVITIES. LESS
OUT DOOR ACTIVITIES WILL RESULT IN
A RISE OF THE ISSUES LISTED. IF THE
WORRY OF VEGETATION IS AT STAKE, THEN WHAT
FOR? DIRT BIKE RIDERS ARE OF NO HARM
TO THE NORTH DESERT OF GRAND JUNCTION. IF
ANYTHING MAKE IT WHERE YOU HAVE TO PURCHASE A
YEARLY MEMBERSHIP TO KEEP THE DESERT CLEAN!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): DEREK WILLIAMS E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I think the entire plan to change anything from how it is right now is complete and utter BULLSHIT. You want to take away 100% of the limited areas we already have and limit things more? You people must be crazy. Leave things well alone, everything is fine the way it is.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Daniella Yang

E-Mail/Phone: 970-712-0215



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM

June 6, 2013 - Open House

Hands off ~~the~~^{our} public ROADS!
you hold them in trust for the people
Notwithstanding FLPMA, The Colorado
Enabling Act obligATES The Federal
Government to dispose of the property
unappropriated.

BLM has no jurisdiction to close roads
Rather BLM Has a proprietary interest
in maintaining the land only.

No more charade - No more consent,
you are an agent with limited
authority.

The people are waking up!
Know your place. mind your duty.
further destruction of RS 2477 is a criminal
offense

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

DAVID Justice

E-Mail/Phone:



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

As an individual who enjoys our public lands for personal recreation/recreation/education of our children/etc., I am not in agreement with the proposed closures/alternate "plans".

The plans do not appear to be fully thought out, nor enough information gathered to properly put the proposals into place.

Beyond the obvious instant effects the proposed closures would have on our right to enjoy our beautiful recreation areas, the economic effects must be considered.

Many businesses would suffer; our economy would suffer due to a decrease in tourists, be them "off-road", hunters, "vacationers". When our economy suffers, our residences/communities lose value and suffer.

Please reconsider, conduct PROPER research and base decisions on legitimate facts, not "gutwrench" opinions. Opinions are just opinions, often not based on facts, but rather emotions.

Thank you for your consideration

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I moved to Grand Junction almost 4 months ago and take my BZR out with my father as often as possible. It would not make much sense to close tracks that what seems to be the majority of us use.

The trails and outdoor based activities and mentality is the main reason we moved here from Denver. I, as well as my father, enjoy our time spent on the trails and I have hopes of starting my own family here so that my family and I will have things to enjoy. "The loss of 60% of the general motorized access and some 88% of the open areas will have grave financial consequences." You aren't only hurting the people of the areas that you plan to shut down, but you are hurting the surrounding economies as well.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Rhys Price

E-Mail/Phone:

970-773-3872

r.international@215@g



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

Not only for recreation use but for economic impact of the community. This affect both things that i do, Recreation, I not only own multiple powersports ~~and~~ and use these proposed closures. Economic, I moved to grand Junction to work for a powersports dealership. The proposal will affect me in 2 major life changes
Keep the trails open

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):  E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

You have done a magnificent job!
This is a blessing to see the county
proposing these interests in the RMP.
It would be amazing to see what you have
proposed to go through. Thank you!!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Cody Hutchens

E-Mail/Phone: 370-690-3453



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

you have done a great job with all the maps. you have done an awesome job of connecting trails and keeping trails open that are very important to so many of ~~us~~ us. it means a lot to us that you guys have put in so much interest into the RMP. and realize the impact that it will cause to our county if the BLM gets there way.

Thank You!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Codie Houtchens

E-Mail/Phone: houthcensaola@gm
c



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

To whom it May Concern
 I am a 60 year old male with a Bad
 heart copd w/ohly replaced parts and
 I dont understand why Colorado Law
 says if a road has been open for 25 year
 or longer it is an established road
 why now are they trying to change
 they do more damage by closing these
 roads than any!!! Vehicle has ever
 Done from an old archer and have
 been for 48 year but I cant walk 5 to
 7 miles to get to my stand and if I
 do any thing I will either have to
 pay someone to retrieve it or set it on
 the spot. this is wrong and dont so
 maybe I should quit hunting **HE WONT
HAPPY**

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Tom W Sevani

E-Mail/Phone: 970-640-8098

I speak for my whole family!!!



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Do not touch or destroy any of our rights-of-way! period

Any and all roads protected by RS2477 will remain open! period

Destruction of Public Property is an arrestable offense and will be treated as such! period

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Linda Bestland

E-Mail/Phone: _____



MESA COUNTY

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GJFO DRAFT RESOURCE MANAGEMENT PLAN COMMENT FORM June 6, 2013 - Open House

Reading an article the other day I was surprised to see the sheer amount of revenue loss to local business lost due to oilfield pullout. Given the fact recent laws have hurt hunting and other tourism it is important that we keep every route open. Tourism is a last stand for mesa county and closing roads will be the final nail in our coffin. Alternative A for every zone is our only hope!!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Gabriel Callender

E-Mail/Phone: 970-462-6470



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I thank you for the meeting and the support you're giving us to help keep many of the trails open. I along with others love Colorado and what it has to offer but would not be able to enjoy it as do to 3 back surgeries that limit my ability on walking distance. I do not like to stay at home & spend all my time outdoors

I thanks

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Ronald [Signature]

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

OPEN AREA

THE PROPOSED REDUCTIONS TO THE GRAND VALLEY OAV AREA IN THE NORTH DESERT ARE UNWARRANTED AND NOT WARRANTED BY THE FACTS. THE DRMP FAILS TO IDENTIFY ANY RESOURCES AT RISK AND IDENTIFIES ANY CONFLICT OF USES IN THIS AREA

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): CLIFF J ALLEN

E-Mail/Phone: CADUCE3@LAHOC.C



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Please Keep open for public access all
vested interest routes in Zone C.

I frequently use shooting practice
venues (several) off 25 road on unimproved
dirt roads that generally follow the
power lines to the west from 25 Road.

Good, safe, shooting sites are found
along this road as it curves west and then
north for several miles from its intersection
with 25 Road. These sites are very safe
from stray rounds because of encircling
cliffs on two or even three sides.

These sites are much safer than the
27 road shooting range which frequently
has youngsters carrying loaded firearms up along
the range unsupervised and people changing targets
downrange while others are still shooting.

Comment deadlines:
Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Dr. Kent Carson

E-Mail/Phone: KentCarson@bnes
4e



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I would like to commend Mesa County on their plan to designate the area in Zone "L" from 21 Rd to 29 Rd as a "Vested Interest" Area. I live on property bordering this area and feel that it should remain open to motorized recreation. If this area were closed it would severely impact other areas by greatly increasing use and density of riders.

I would also like to thank M.C. for their efforts to keep access open in Zone "D", south of Kannah Creek Rd. My parents live in this area and we use these trails multiple times per year for recreation, picnics and hunting.

I want to encourage M.C. to continue to push back against planned closures of our public land! "Public" land needs to have public access!

Thanks again for consideration of my comments!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Bradley Barker

E-Mail/Phone: 970-216-2071



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I am in support of the vested interest routes for many reasons, personal use of 27 1/4 Rd North Desert Zone 1 especially is important to me and my family. We use this area for the shooting range, riding our dirtbikes, mountain biking, yuhuling and camping. This is what we do as a family and why we have stayed in the Grand Valley even when my spouses job has been elsewhere. Thank you for trying to do this for our community. It would be a shame for our valley to lose areas that still bring in money from out of town visitors for activities my family does as well. If a low road is not chosen I would be the best option for most areas which would still be a huge decrease in areas available that are used everyday.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Brandi Palmer

E-Mail/Phone: brpalmer77@gmail.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Bangs Canyon - We regularly ride motorcycles in the Bangs canyon area, so do our friends.

Open Area - It's important not to shrink it. Our son was hurt in a small OHV area due to the high concentration of traffic. It is important to keep the area large for safety reasons.

Keep as many routes open as possible. We wander on BLM lands. Closing most of the roads/trails completely stops this ability.

Thanks for your efforts, County Commissioners

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): ANN TISUE

E-Mail/Phone: at 3507breshan.net



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Billings Canyon rd
This is a great trail for extreme off road use, the access has spectacular views we have been using and maintaining this trail for 10 years and it continues to improve the experience. I use this trail on a very regular basis, guide people from out of town, spending their money in our economy - My wife and I were married on this trail and though most people would not get married on this trail, they seem to get a great deal of satisfaction running this trail.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): AVE MURPHY

E-Mail/Phone: 970-773-3306



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

21 Rd. Grand Junction

I use this trail for Jeeping, cycling, hiking, and camping. I lead groups from other areas, spending their ~~\$\$\$~~ dollars in our economy to experience and share their experiences. We respect the trail and other users, maintain and clean up the trail when we use it. This trail has great photographic opportunities, challenges for Jeeping from mild to extreme to close this road would lead to people not being able to share these experiences on our public lands. Once the trail is closed to full sized vehicles, the access for all types of uses is also then prohibited. One of my friends had her knees replaced and can no longer hike, she has to use a full size vehicle to experience this trail!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Shane Murphy

E-Mail/Phone:

970-773-3306



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

you're doing a great job with the vested
Interest areas. It is my understanding that
the Economic Impact Statement in the RMP
was based on bicycle riders who come to
the area to ride. Motorized vehicles owned
by locals were ignored.

We own a Jeep, Camper, truck to haul the
camper, an ATV and 3 motorcycles. All
were purchased here - and they're
licensed here. I think that has an
economic impact!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Aaris Janowski

E-Mail/Phone:

janowskidr@msn.
com



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

The BLM's RMP fails to provide specific reasons for trail closure. Thus it becomes very difficult to mount a case for keeping that trail open. The public needs to be given specific reasons to which they can respond.

We appreciate your efforts to keep as many trails open as possible. We moved here in 2005 because we hike, motorcycle, Jeep and ATV. Sadly, it sometimes seems that the BLM is unaware of the fact that many people here are "multi-use" and don't appreciate being seen as ignorant "yahoos" out to desecrate pristine land.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Jaris Janowski

E-Mail/Phone:

janowskidr@msn.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

The RMP never addresses the value of partnerships with user groups. Such groups maintain trails, conduct trail clean ups, and work amicably with other user groups to foster amicable co-use of trails.

Our Jeep club has offered again and again to adopt certain trails that are managed by the BLM. The response? For years they ignored our offers. And then, this year, they said no.

We are ready, willing and able to maintain and rebuild trails. The idea that "the public proposes, the BLM disposes" is a slap in the face to responsible user groups, it is contrary to the spirit of community that is a hallmark of our Western Slope culture. We hope that Mesa Co. will actively work to foster/broker partnerships between user groups and the BLM

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

David Janowski

E-Mail/Phone:

janowskidr@msn.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Outdoor recreation is an extremely important part of Mesa County's economy. It includes hikers, bird watchers, bikers, motorcycle riders, Jeeps and ATVs. We applaud Mesa County's recognition of the importance of keeping as many trails open as possible for motorized vehicles.

We recently spoke with a BLM rep + pointed out that we moved here because of the outdoor recreation and that we reach the places where we recreate via Jeep/ATV/motorcycle. And once we get there, we hike, fish, hunt, picnic or simply enjoy the scenery. We are at an age where hiking/biking to these remote spots is not feasible. He said that the BLM thinks that if people can't enjoy their trails any more they'll "find something else to do." Yup, they will. They'll leave.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Aoris Janowski

E-Mail/Phone: janowskidr@msn.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

The economic impact of proposed trail closures has not been properly addressed in the RMP - total recreational spending and the impact of multiple trail usage has been drastically understated. When I asked a BLM how they intended to address these errors, he said they would ask their consultants to re-do the plan and provide "more robust" information. CMU did that erroneous work. I would strongly suggest finding a more sophisticated consultant who can see the big picture!

Thank you for your actions to save our access to trails like Coon Hollow!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Alex Janowski

E-Mail/Phone: janowskidr@msn.com

June 6, 2013

To: Mesa County Commissioners

From: Bob and Doris Janowski
150 Eagle Trail Court, Whitewater, CO 81527
janowskidr@msn.com, 970-254-1797, 970-361-1721, 970-361-1875

Re: Comments, Draft Resource Management Plan, Grand Junction Field Office of the Bureau of Land Management

There are a number of critical flaws in the Resource Management Plan (RMP); we respectfully ask that Mesa County address the following concerns:

1. The economic impact of proposed trail closures has not been properly addressed in the RMP.

The RMP calculates total recreational spending in the area at \$7.2 million. This figure stands in stunning contrast to the calculations of Colorado Parks and Wildlife (CPW) at \$131 million, the Colorado Department of Tourism (CDT) at \$384 million and the Colorado Off-Highway Vehicle Coalition (COHVCO) at \$141 million.

In addition, the RMP's assessment of the impact of multiple trail use on jobs is woefully inaccurate. The RMP asserts that 90 jobs are the result of recreation in the Grand Junction Field Office planning area. In stark contrast, COHVCO found that 2,147 people are employed in jobs related to motorized recreation; CPW found that 1,392 people in Garfield and Mesa Counties are employed in positions related to hunting and fishing; CDT found that 4,310 people are employed in positions related to tourism and travel in Garfield and Mesa Counties. Grand Junction's Chamber of Commerce has pointed out that Cabela's alone employs more than 200 people. Another 350 jobs can be traced to the Paiute Trail in Utah, numerous motorcycle and OHV shops in the Grand Junction area and to the operation of the BLM's Field Office.

When the BLM was asked how it intends to address these inadequacies in their assessment of the economic impact of trail closure, it responded that it will ask the same Colorado Mesa University entity that arrived at these erroneous figures to re-do its work and to arrive at a "more robust" conclusion.

Certainly, a new study of economic impact needs to be made. We would suggest that a different consultant be used to make that study

2. Specific reasons for closing trails have not been given.

This lack of specificity makes it virtually impossible for the public to comment meaningfully on the reasons for closure or on proposed methods to mitigate the BLM's concerns. The public is put in the position of an attorney attempting to defend a client; we know what the sentence is, but we've no idea what the charges are!

Specific reasons for trail closure need to be disclosed to the public. Furthermore, it is not sufficient to simply cite "wildlife" or "erosion," for example, as the reason for closure. We need specifics: what wildlife? Is it a calving area? A migratory route? Is it a threatened species? What is the factual basis for the proposed closure?

3. The value of partnerships with user groups is never addressed in the RMP.

One of the great strengths of Mesa County is its community spirit. That "sense of community" had a great deal to do with our decision to move to Mesa County nine years ago.

User groups—Jeep clubs, ATV clubs, motorcycle clubs—have long demonstrated a dedication to building and sustaining trails. We routinely maintain trails, conduct trail clean-up efforts, and emphasize the wisdom of sharing trails amicably with all users. We have offered to adopt trails and our offers have been ignored or refused by the BLM.

If a trail is being closed because it needs a culvert, for example, or some other form of mitigation or maintenance, the manpower to remedy that need is readily available to the BLM through user clubs.

The idea that "the public proposes, the BLM disposes" is antithetical to the spirit of community and "the Code of the West" that infuses our Western Slope culture.

We strongly recommend that Mesa County foster/broker partnerships between user groups and the BLM. That would result in a win-win situation for all concerned.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

RECREATION IS A HUGE PART OF
WITH MYSELF AND THOUSANDS OF OTHER
PEOPLE LIVE HERE. I AM GLAD
TO SEE YOU UNDERSTAND WHAT PEOPLE
LIKE ABOUT THE COUNTY. WE DONT HAVE
TO PUT UP WITH THE DIRECTION THE
US GOVT IS GOING ACROSS THE WEST
BY CLOSING AS MUCH AS THEY CAN
GLAD TO SEE YOU TAKE A STAND!!!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional):

JEFF BATES

E-Mail/Phone:

SKYRIVER RANCH
@YAHOO.COM



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

IT IS WONDER FULL TO SEE THE SUPPORT YOU
HAVE EXTENDED TO THE PEOPLE OF MESA
COUNTY. YOU HAVE DONE A GREAT JOB! AND
YOU HAVE MY FULL SUPPORT. THANK YOU
FOR LISTENING TO US AT ALL OF THE MEETINGS
IT IS GREAT TO SEE WHAT YOU HAVE
DONE. THANK YOU

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): JEFF BATES

E-Mail/Phone: SKY RIVER RANCH
@YAHOO.COM



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

THE ECONOMIC IMPACT OF THE PROPOSED
BLM RMP WILL TAKE MONEY FROM
THIS AREA AND IT WILL GO ELSEWHERE
PLEASE DO EVERYTHING YOU CAN TO
STOP THE CLOSURES TO OUR PUBLIC LAND
THANK YOU FOR WHAT YOU HAVE DONE
SO FAR!!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

JEFF BATES

E-Mail/Phone:

SILVIA EVERMILL
@YAHOO.COM

New Reply Delete Archive Junk Sweep Move to

Tommie D Derryberry Sr

RMP



Kenneth Sanders 4:26 PM

To: Tom & Karla Derryberry

Tom

My view

I want to thank the Commissioners for enlisting citizen input regarding BLM's RMP. However, I believe the process should be reversed. The Commissioners are asking County residence to provide justification for keeping current established routes open. Any route within the county that could fall under RS2477 should be deemed a County road. If the BLM wants to close any of these County roads, the Commissioners should provide justification for the closure and bring this justification to the residence of the County and let the residence decide if it is a viable closure.

The County Commissioners are elected officials that act in the best interest of County residence while the BLM is a Federal agency that operates under Federal guidelines. These guidelines require local input but the BLM is under no mandate to incorporate this input into the final decision. Mesa County, as a political entity, has a higher standing in the decision process. The commissioners need to use this standing to require the BLM to show reasons for the mass closures that are being proposed.

Thanks you.



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

With these vested interests from County Road access, it provides a permanent status for residents and tourists use of trails.

Many of the folks riding of all types have been very concerned with trail closures. With your efforts at all zones that have a County Rd access, it changes the way users can plan in future.
Thank again,

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): Tom Derryberry Sr

E-Mail/Phone: 970 858 7366

tom-derryberry@
hotmail.com



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

Attending this open house and seeing that the Mesa County has stepped up is great.

By addressing many of the areas now in heavy use, Zone L, Zone P, Zone U, Zone V maps show a concern for the recreating public.

This financial impact to the Valley will make a huge difference in future years.

By partnering with many user groups in the Valley, keeping trails open sets with the majority of people in the Grand Valley area.

The economy will grow as more people come here to recreate as a destination from a tourism base. Having access that is permanent then allows for promotions that bring in revenue for the county and local business. Thanks for pushing these vested interest areas off of county roads.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional):

Tom Denyshek Sr

E-Mail/Phone:

970-858-7366



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I love what you have done its spot on and would save for the people of this county the historic value in these roads. There is so much history standing to be lost in the closure of so many of these roads. Also it is fantastic the points that the county has brought to light about the holes and flaws in the RMP, I personally had such concern for the lack of what many of us feel is a very incorrect idea of the daily costs & the economic impact for this community with the closure of these roads and trails. Once again great job we love the proposed interests you have taken thank you!

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Grand Mesa Jeep Club E-Mail/Phone: _____



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

you have listened very well
to every ones comments. you
have done a great job.

- GIMJC -

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM

June 6, 2013 - Open House

Great job! Spot ON!

-GMJC-

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

It is so nice to see @our
County having an interest in the
RMP. you guys have listened to
our suggestions very good and
have done an amazing job
at coming up with your own
maps. I can't thank you enough!

GMJC

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): _____

E-Mail/Phone: _____



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

I am a G.J. native of 48 yrs, my family and I are out in our BLM Lands almost every weekend from spring thru fall. I have 2 young boys and for our own safety we always camp-ride, hike where there are no or few others. It is dangerous to have too many dirt bikers ATVs or shooters touch in one small area so it is important we learn to share our lands and keep them open for future generations to use and enjoy.

I would also like to add that these are OUR lands and our government has no just cause to keep us from accessing them!

GMO/RED-92-116BA

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional):

Joe Jarvis

E-Mail/Phone:

Jim Joex@aol.com
970 260 2748



GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House

BMO/RLED-92-116 BA APR 14 1992

GIVES US ACCESS TO PUBLIC LANDS

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): WARREN AUSTIN

E-Mail/Phone: _____

GAO

Testimony

Before the Subcommittee on National Parks, Forests
and Public Lands, Committee on Natural Resources
House of Representatives

For Release on Delivery
Expected at
10:00 a.m., EST
Tuesday
November 9, 1993

FEDERAL LANDS

Public Land Access

Statement of John H. Anderson, Jr., Associate Director,
Natural Resources Management Issues,
Resources, Community, and Economic
Development Division



058518/150287

Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss the concerns raised by you on the lack of public access to federal land. My testimony will focus on our April 1992 report¹ to you on the adequacy of public access to land managed by the Department of Agriculture's Forest Service and the Department of the Interior's Bureau of Land Management (BLM). The report provides information on the extent, reasons for, and effects of inadequate access and the methods used by the two agencies to resolve access problems.

Inadequate access, as we defined it through discussions with Forest Service and BLM officials, means that the federal government has not acquired the permanent, legal right for the public to enter federal land at the point(s) needed to use the land as intended by the managing agency. Under this definition, permission from nonfederal landowners to cross their land is not considered adequate access because such permission can be revoked at any time. Because neither of the agencies maintained information centrally on access problems, we sent questionnaires to all of their field office managers and visited 16 field locations. At the completion of our review all questionnaire data was made available to the agencies for their use.

In summary, the questionnaires indicated that access to about 50.4 million acres, or about 14 percent, of Forest Service and BLM land in the contiguous United States was considered inadequate by agency managers.² According to the managers, private landowners' unwillingness to grant public access across their land has increased over the past decade as the public's use of federal land has increased. Private landowners' concerns about vandalism and potential liability and their desire for privacy or exclusive personal use were the major reasons cited for inadequate access. Inadequate access to federal land can reduce the public's recreational opportunities and can also interfere with the agencies' land management activities. However, the extent of these effects varies by activity and geographic location.

To resolve public access problems, the Forest Service and BLM can acquire either all rights and interests associated with the land (called fee simple acquisition) or perpetual easements (limited rights to enter and use the land for access which are binding on succeeding owners). Fee simple acquisitions and perpetual easements can be acquired through purchase, donation,

¹Federal Lands: Reasons for and Effects of Inadequate Public Access (GAO/RCED-92-116BR, Apr. 14, 1992).

²Public access to federal land in Alaska is ensured under the Alaska Native Claims Settlement Act of 1971. The state of Hawaii does not have any Forest Service or BLM land.

exchange, or condemnation. In fiscal years 1989 through 1991 (the years covered by our questionnaire), the Forest Service and BLM acquired permanent, legal public access to about 4.5 million acres of federal land. As of October 1991, the two agencies had actions pending to open another 9.3 million acres of federal land to the public.

BACKGROUND

Of the nearly 700 million acres of federal land, about 465 million acres are managed by the Forest Service and BLM. This land provides valuable resources--including timber, water, minerals, energy reserves, and livestock forage--and valuable uses--including wildlife habitats, wilderness experiences, and recreational opportunities. Intermingled with the federal land is state and local government land, as well as land owned by corporations, Native American tribes, and private individuals. This checkerboard pattern of ownership, particularly in the western states, can make it difficult for the public to gain access to federal land without crossing nonfederal land. Unless the federal government obtains permanent, legal public access, nonfederal landowners can control or deny access to federal land.

EXTENT OF AND REASONS FOR INADEQUATE ACCESS

According to the questionnaire respondents, about 50.4 million acres, or about 14 percent, of the land managed by the Forest Service and BLM in the contiguous 48 states lack adequate public access. The Forest Service's Southwest, Intermountain, Northern, and Rocky Mountain Regions had the largest amounts of acreage with inadequate public access. BLM offices in California, Idaho, Nevada, Oregon, and Wyoming had the most acres with access problems. (See apps. I and II.)

Private landowners' major reasons for not granting the public access to cross their land were concerns about vandalism and potential liability and desire for privacy or exclusive personal use. For example, a Montana landowner we talked with told us that allowing public access disrupts his cattle-ranching operation because the public disturbs grazing cattle, and the animals move to other areas. The rancher is then forced to spend time collecting the cattle and returning them to the pasture. While on this ranch, we also observed that some of the rancher's signs had been shot, and we actually saw some trespassers cutting down trees on his property for firewood.

Another rancher in Montana we also talked with said he did not want hunting parties to cross his land because he feared that they would introduce noxious weeds. According to the rancher, seeds of weeds such as leafy spurge and spotted knapweed, which crowd out

pasture grasses, can be carried onto the land in tire treads, horses' hooves, or hikers' clothing.

Given such concerns, private landowners use various means of restricting the public's access to federal land. According to agency officials we talked with, some private landowners physically block access routes, others erect warning signs and still others have threatened trespassers with guns or attack dogs.

EFFECTS OF INADEQUATE ACCESS

Inadequate access to federal land reduces the public's recreational opportunities. The recreational opportunities most reduced by inadequate access are hunting, off-road vehicle use (e.g., dune buggies and dirt bikes), hiking, and camping. However, according to the questionnaire respondents, the extent of access problems is not the same nationwide and the extent to which recreational opportunities are affected differs by type of activity and by geographic location.

What is a problem in one part of the country is not necessarily a problem in another. For example, hunting was reported by BLM managers as being greatly or extremely reduced in California, Colorado, Idaho, Montana, Oregon, Utah, and Wyoming but not in Arizona, Nevada, New Mexico, or the eastern states. According to Forest Service supervisors, hunting was greatly or extremely reduced everywhere but in the Eastern Region. Camping, according to BLM managers was reduced in Idaho but not in Oregon, whereas mountain biking was reduced in Oregon but not in Idaho. According to Forest Service supervisors, fishing was reduced in the Rocky Mountain Region but not in the Northern Region, whereas wilderness use was reduced in the Northern Region but not in the Rocky Mountain Region.

Inadequate access also interferes with the agencies' land management activities. In some cases, this interference is extreme, in other cases, it is merely a nuisance. According to the questionnaire respondents, the management activities most interfered with by inadequate access are construction, trail and road maintenance, and wildlife habitat. Other management activities interfered with, but to a lesser extent, include law enforcement, fire protection, and search and rescue.

Extreme interference in agency work was reported at a site in the Los Padres National Forest in southern California. At this site, the Forest Service does not have free access to a mountaintop containing communications equipment--some owned by the Forest Service and some by other federal agencies or private corporations holding Forest Service permits. Part of the road leading to the mountaintop crosses private land, and the private landowners charge the Forest Service and the permittees an access fee to cross their land for equipment maintenance purposes. The private landowners'

refusal to allow free access interferes with both the Forest Service's and the permittees' work at this site. Because the Forest Service had not been able to obtain legal access to cross the private land, agency officials were considering building a road to reach the site from the other side of the mountain.

In other cases, inadequate access is perceived as more of a nuisance than an interference in agency management activities, and its effect is slight. According to a BLM official we talked with in Oregon, BLM personnel occasionally encounter locked gates on private land they are crossing to reach fires on federal land. In such a situation, according to this official, BLM personnel simply cut the lock and proceed to the fire. While such an instance of blocked access is a nuisance, the effect on the agency's management ability is slight.

AGENCY METHODS OF ACQUIRING PUBLIC ACCESS

The Forest Service and BLM can use fee simple acquisitions or perpetual easements to acquire public access. Either of these can be accomplished through purchase, donation, exchange, or condemnation. Condemnation, simply put, is the federal government's legal right to take private property for public use, without the owner's consent, upon payment of just compensation.³

During fiscal years 1989 through 1991, according to the questionnaire respondents, the Forest Service and BLM successfully completed about 2,600 "access actions,"⁴ thereby obtaining public access to 4.5 million acres of federal land. Perpetual easements were used by the Forest Service and BLM in 53 percent and 70 percent of the cases, respectively, and fee simple land acquisition was used in 27 percent and 25 percent of the cases, respectively. The Forest Service used condemnation actions in only about 3 percent of the cases, and BLM used them in less than 1 percent of the cases. According to agency officials, they use condemnation rarely because the process is time-consuming, expensive, and can be politically sensitive.

Our questionnaire asked the Forest Service and BLM managers to report their pending access actions as of October 1991. The Forest Service and BLM reported that they had about 3,300 access actions

³Condemnation is authorized under the Federal Land Policy and Management Act of 1976.

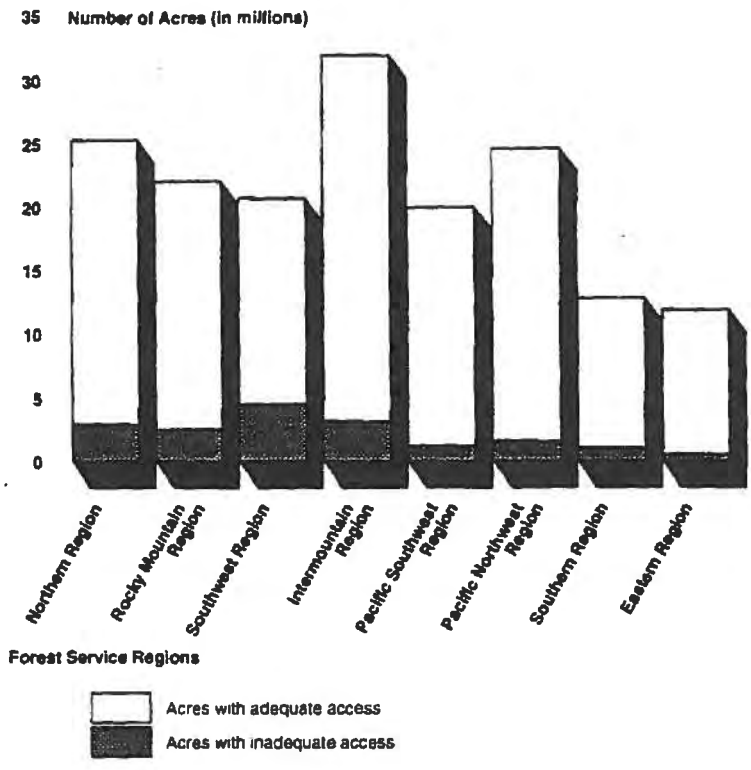
⁴For purposes of our questionnaire, we asked the respondents to count the number of cases completed over the 3 fiscal years, counting each separate conveyance of land or easement as an individual case. These access cases are referred to as access actions.

pending--some work had been done, but access had not yet been obtained. If all of these actions were successfully completed, another 9.3 million acres would be open to public access--about 18 percent of the 50.4 million acres reported by the agencies as having inadequate access. Of the 3,300 access actions pending, however, the agencies had identified 540, involving 2.3 million acres, which they believed would require condemnation action.

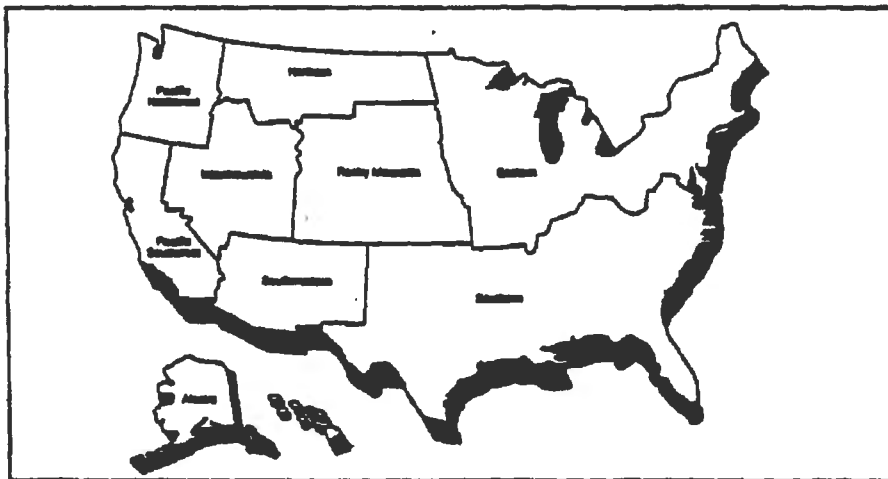
- - - - -

Mr. Chairman, this concludes my statement. We will be happy to answer any questions that you or other members of the Subcommittee may have.

FOREST SERVICE ACRES, BY REGION,
WITH INADEQUATE PUBLIC ACCESS



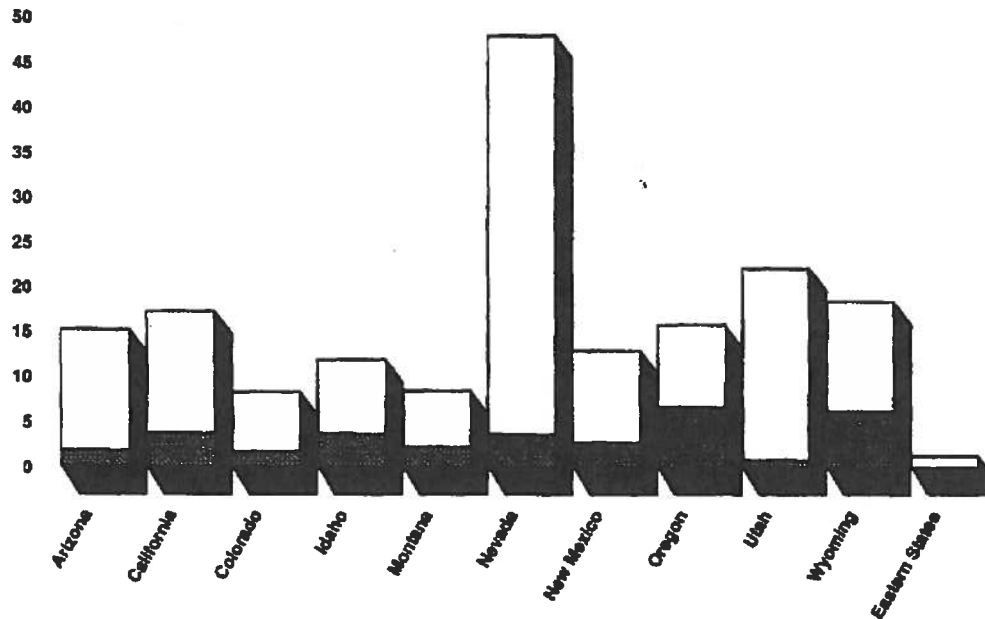
Source: Basic data provided by the Forest Service.



BLM ACRES, BY STATE, WITH
INADEQUATE PUBLIC ACCESS

BLM Acres, by State, with Inadequate Access

Number of Acres (in millions)

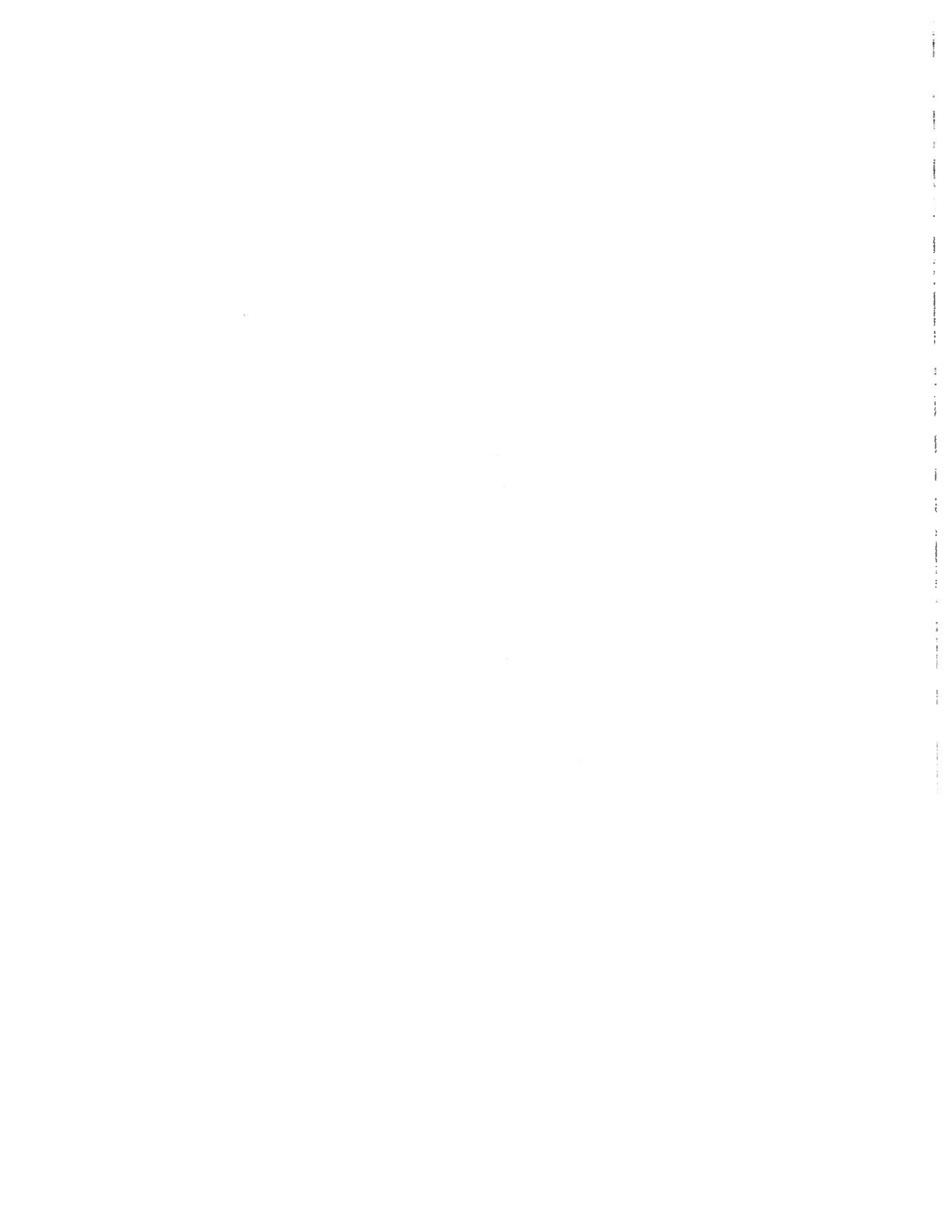


BLM States

- Acres with adequate access
- Acres with inadequate access

Eastern States office reported no inaccessible acres.

Source: Basic data provided by BLM.



Ordering Information

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**Pan Pacific Services Recommended Comments to
Mesa County Board of County Commissioners - May 2013**

Defective Notice of Intent (NOI)

The Notice Of Intent (NOI) of October 14, 2008 presented no proposal for the public to respond to during the scoping period.

No Humans in Purpose and Need

The DRMP Purpose and Need must include the intent of Congress, which is to manage the land for human use and occupancy, stimulate development of mankind, foster the general welfare, and promote productive harmony with nature. The Travel Management Plan includes no consideration of the contribution of motor access to the development of man, or to the enjoyment of productive harmony. The material posted on the RMP website about what issues are affecting each route ("Route Issue Table") has no provision for the beneficial effects of all of the routes.

TMP Goal Statement Is Misleading

The DRMP claims it is providing for future recreation needs, when in fact reducing the present transportation system does the exact opposite.

Planning Issue 1 Assumes Route Closures

The assumption that routes must be closed, when the existing footprint of all the routes equals well under 4/10ths of one percent of the entire 1 million acre land base, is misguided. This assumption is also not borne out by the analysis: The Environmental Consequences chapter does not indicate that there is any significant problem in the planning area under the existing situation.

Does Not Answer Planning Issues

The DRMP does not, or cannot, resolve eight of the planning issues.

No Issue ID

The DRMP poses a list of questions about each area of BLM jurisdiction, but does not say what needs to be changed, or why something needs to be changed.

Arbitrary Answers To Planning Issues

Table 1-4 presents the planning issues as questions. The questions are posed as wide-open to any answer. This could point to an arbitrary selection of "answers" to these issues.

10

**Pan Pacific Services Recommended Comments to
Mesa County Board of County Commissioners - May 2013**

Comment Analysis Ignores Time

The DRMP must be corrected to include an analysis of existing conditions in the context of the history of the planning area. The analysis must disclose what conditions have been in the past, and make some assessment of what has changed, where, and by how much. This DRMP has not done that, even though that is the only way to justify management changes.

Withdrawals 5,000 acres

The DRMP misinterprets 43CFR 8342 regulations in Appendix M, Evaluation Process, and expands its meaning to include new areas outside Wilderness Study Areas (WSA) , places buffers around existing WSAs, and expands existing SAs. , must. The DRMP does not have the proper analysis and statutory authorization to this withdraw areas amounting to 5,000 acres in aggregate.

Unknown Information

The DRMP fails to *consider* the importance of the unknown information. The Plan has acknowledged it is missing information, but it does not *consider* the influence that these unknowns must have on the proposals.

Designation Criteria

Benefits to humans have been totally overlooked in the route designation process.

Social Structure

The social analysis is significantly incomplete.

Lands with Wilderness Characteristics

DRMP section 3.2.14 is unlawful. At DRMP page3-143 BLM claims that its authority to inventory lands for wilderness quality still exists under Section 201 of FLPMA. This is plainly incorrect.

ERMAs Are Shown As SRMAs

The ERMA's described in the Allocation Plan do not follow the BLM Handbook instructions.

User Conflict

The phrase "user conflict," used repeatedly in the DRMP, is not defined anywhere in the DRMP.

**Pan Pacific Services Recommended Comments to
Mesa County Board of County Commissioners - May 2013**

Administrative Closures

The DRMP fails to disclose what the objective is of denying general public use on these routes.

Administrative users

The DRMP fails to: define this term; tell us who will be allowed to use the routes; and provide any information about whether the denial of use would have any administrative remedy.

Economic Generator

The loss of 66% of the general motorized access and some 58% of the Open Areas will have grave financial consequences. The DRMP's data is uncited and is in serious conflict with a very reliable and well respected sources, including the Western Governors Association.

Economics

The economic numbers in the DRMP to have several lopsided non-comparable categories because of improper and inconsistent use of the data.

SRMAs_ERMAs are Predecisional

The establishment of the SRMA's, RMZ's, and the newly shrunken ERMA's all appear to have occurred before any analysis.

Real Cumulative Effect

The DRMP fails to disclose the most basic and obvious cumulative effect of closing and rehabilitating over 1,000 miles of routes in the Planning Area.

Route Issue Table

It appears that contrary to FLPMA, NEPA, and case law, the DRMP considers the very existence of a route a negative conflict with the natural resource.

No Cumulative Impacts Route Reduction Concentration

The DRMP has not conducted a thorough cumulative impacts analysis. CEQ emphasizes what is reasonable, and the courts have determined that Decisions must be rational.

12-1

**Pan Pacific Services Recommended Comments to
Mesa County Board of County Commissioners - May 2013**

Productivity

The DRMP's report at page 4-443 about the relationship between local short-term uses and long-term productivity, as required in the NEPA Section 102 (c) is incorrect. BLM is directed by Congress to manage for multiple uses, and implementation of any of the action alternatives will permanently constrain the long term productivity of the lands for multiple uses

Open Area

The proposed reductions to the Grand Valley OHV Area in the North Desert are irrational and not warranted by the facts. The DRMP fails to identify any resources at risk nor identifies any conflict of uses in this area.

Bangs Canyon

The DRMP omits a key activity from its methodology and discussion of Bangs Canyon SRMA. Through an inaccurate and incomplete discussion, the DRMP leads readers to believe it is primarily a mountain bike SRMA when in fact one of the principle objectives of the Bangs Canyon Plan is provide motorized trail opportunities.

34 and C Road

Creating an "ERMA" at 34 and C Road is in error because the area needs a higher management intensity, due to the activities occurring there (shooting) and the proximity to residential areas. The shooting opportunity can best be protected by providing a level of management that ensures the shooting is continued in a safe manner.

Close and Rehab

The DRMP does not include a cost-benefit analysis for the mileage of routes proposed to be "closed and rehabilitated."

Recreation Monitoring

The proposed changes to the present travel management system are based on too much speculation and not enough hard information about the planning area.

Prairie Canyon Closure

The closure of all the singletrack trail in Zone K appears to be arbitrary.

Route By Route Comments

Missing from the list of criteria for the selection of designated routs is any reference to the recreation effects that are enjoyed the public.

NON-TMP

June 6, 2013

Pete Baier
Public Works Director
Mesa County

Dear Mr. Baier,

As the county makes decisions regarding the BLM Resource Management Plan, we urge you to carefully consider the growing air quality concerns of our region. It is important for the BLM to take a proactive approach to managing impacts by including measures to ***protect our air***.

Air monitoring data during the past few years indicates that air quality in the Grand Junction air shed is bordering on non-attainment, according to standards designated by the U.S. Environmental Protection Agency. Particulate matter (PM 10 and PM 2.5) and ground-level ozone appear to be reaching levels that are considered to pose risks to public health and welfare.

In consideration of the health risks and to avoid non-attainment, we urge you to join us in asking the BLM to take meaningful steps to ensure clean air. As the revised RMP is implemented, we ask that you advise the BLM to ***adopt measures that consistently address air quality issues at every level of project management***, and require best management practices to limit both particulate matter emissions and emissions of ozone precursors, including volatile organic compounds and nitrogen oxides, ***particularly in regards to oil and gas development and travel management***. In establishing travel management plans, the BLM should adopt the route designations in *Alternative C* to lessen air pollution from soil disturbance and tailpipe emissions. Vehicle emissions and dust from disturbed soils and unpaved roads add to the growing Grand Valley pollution problem. We believe proactive measures by the BLM will be instrumental in protecting human health and ***avoiding non-attainment***.

Sincerely,



Karen Sjoberg
Citizens for Clean Air (CCA)

Please find attached:

1. Copy of letter to be presented to BLM from CCA
2. Copy of letter to be presented to BLM, signed by over 200 Mesa County residents

June 6, 2013

Draft Management Plan
Grand Junction Field Office
Bureau of Land Management
2815 H Road □ Grand Junction, CO 81506

To Whom It May Concern:

Citizens for Clean Air (CCA) is a Grand Valley organization established to promote improvement in our air quality to benefit health, the environment in general, and our economy. Having examined the Draft GJFO RMP, CCA commends the BLM for its review and presentation of air quality issues affecting the Grand Valley and adjacent BLM-administered lands.

Air quality in the Grand Valley is of deep and ongoing concern to local residents and officials and the Mesa County Health Department. Because of climate, topography, severe winter inversions, a growing population, more road dust from increased vehicle miles traveled, greater tailpipe and smokestack emissions, and other pollutant sources, Grand Junction endures monitored high PM10 and PM 2.5 levels where the National Ambient Air Quality Standards (NAAQS) are close to being exceeded, and monitored high ozone levels approach the .075 ppm NAAQS. As a result, human health is impaired. People sensitive to air pollution are strongly affected, causing loss in work productivity, physical discomfort and financial harm to individuals and the community.

Given current, already high levels of air pollution in the Grand Valley, CCA requests that the BLM re-evaluate its proposed approach to protecting Grand Junction's air. CCA believes that the BLM needs to consider the Grand Junction urban area as a special situation requiring additional safeguards with regard to oil and gas development in and near the Grand Valley Airshed. Mesa County has legally defined the Airshed as "that area within the Grand Valley of Mesa County residing [sic] from the state line of Utah to the county line of Delta which falls below 6,000 ft elevation" (Resolution MCM 97-184).

Within and near the Grand Valley Airshed, CCA believes that the BLM Adaptive Management Strategy for protecting air quality is insufficient to protect the 130,000 people now living in the Grand Valley. This strategy [which includes emissions tracking, annual reviews of air resources management data, annual analyses of current air resources management strategies, identification and implementation of mitigation measures, and evaluation of the need for modifications] is slow to implement and reactive, perhaps requiring a NAAQS violation to achieve funding and concerted action. With air pollution already affecting the health of people in the Grand Valley Airshed, oil and gas development over the next 20 years poses such a serious threat that only far greater, more proactive measures at this time can safeguard air quality and public health in the Grand Valley. The primary means to reduce air quality impacts from O&G development is to reduce emissions (mitigation). Accordingly when issuing lease stipulations, conditions of approval, and permit terms, the BLM should require BLM Air Resource Best Management Practices in and near the Grand Valley Airshed, including: low emission engine technology with NOx, SOx, CO, and CO2 controls on drill rig completion and compressor engines; where appropriate, construction of centralized water facilities and gathering facilities for product treatment and storage; installation of plunger lift systems with smart automation; employment of monthly FLIR programs to reduce VOCs; enhanced direct inspection and maintenance programs; green completions; tank load out vapor recovery and vapor recovery units; flash tank separators; optimized glycol circulation in dehydrators; and other enhanced emission controls.

Bureau of Land Management
June 6, 2013
Page Two

Not to require air resource BMPs at the start of all future O&G development in and near the Grand Valley Airshed is likely to condemn to failure BLM catch-up, mitigation efforts to protect air quality and public health in the Grand Valley.

With regard to O&G leasing, CCA hopes that the BLM will reconsider its Preferred Alternative B and close to leasing Glade Park, Bangs Canyon, the Grand Junction, Palisade, Collbran, Jerry Creek, Mesa/Powderhorn watershed areas, the Little Book Cliffs Horse Wild Range, and other BLM-administered lands near or in the Grand Valley Airshed. For the next 20 years, or until an amendment is enacted, these lands with low potential for O&G development should lie fallow, thus better supporting other uses and values while protecting the Grand Valley Airshed from harmful air pollution.

As a final consideration, in establishing its travel management plan, the BLM should adopt the route designations in Alternative C, in and near the Grand Valley Airshed, to lessen air pollution from soil disturbance and tailpipe emissions. Off-Highway-Vehicle travel and, to a much lesser extent, mountain bike and other recreational activity create dust from disturbed soils, unpaved roads and routes that add to pollution in the Grand Valley Airshed. While CCA supports access to BLM-administered lands, we thank the BLM for seeking to close redundant, unsafe, and unmaintained routes that contribute unnecessarily to the Grand Valley's PM10 and PM2.5 problems.

Thank you for your consideration of these comments.

Sincerely,

Karen Sjoberg
Chair
Citizens for Clean Air
c/o Karen Sjoberg
514 Rado Dr. #F
Grand Junction, C 81507

Dear BLM,

As residents of the Grand Valley community, we thank you for your efforts to obtain citizen input before you make a decision to adapt a revised Resource Management Plan. We recognize and appreciate the hard work this effort entails. We also recognize the significance of such a plan to guide us through the important decisions ahead regarding our air, water, public health, wildlife and economics.

As such, we urge you to carefully consider the growing air quality concerns our region faces and to take a proactive approach to managing impacts by including measures to protect our air in the revised RMP.

Air monitoring data during the past few years indicate that air quality in the Grand Junction air shed is bordering on non-attainment, according to standards designated by the U.S. Environmental Protection Agency. Particulate matter (PM 10 and PM 2.5) and ground-level ozone appear to be reaching levels that are considered to pose risks to public health and welfare.

In consideration of the health risks and to avoid non-attainment, we ask the BLM to acknowledge the importance of clean air and its effects, and that you take meaningful steps to ensure that authorized actions within the Grand Junction Field Office help us to maintain or improve our air quality. As the revised RMP is implemented, we request that you adopt measures that consistently address air quality issues at every level of project management and require best management practices to limit both particulate matter emissions and emissions of ozone precursors, including volatile organic compounds and nitrogen oxides, particularly in regards to oil and gas development and travel management. We believe such an effort by the BLM will be instrumental in protecting human health and avoiding non-attainment.

Again, we thank you for your active solicitation of citizen input. We hope you take advantage of your opportunity to play a vital role in protecting our region's clean air.

Sincerely,

Printed Name

Signature

Zip Code

Jo Ann Moon	<i>Jo Ann Moon</i>	81505
Claudette Konola	<i>Claudette Konola</i>	81504
Kathryn Christian	<i>Kathryn Christian</i>	81501
Michael Dolbeck	<i>Michael Dolbeck</i>	81501
Eric A Rachel	<i>Eric A Rachel</i>	81503
Jan Muijskens	JAN MUIJSKENS	81501



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I WOULD LIKE SOMEONE TO TELL ME WHAT THE DIFFERENCE IS, OTHER THAN LOCATION, THAT SEPARATES THE GUNNISON SAGE GROUSE FROM ANY OTHER SAGE GROUSE?

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gjfo_rmp@blm.gov)

Name (optional): KEVIN MCCARNEY

E-Mail/Phone: kmccarney@prodigy.net



**GJFO
DRAFT RESOURCE MANAGEMENT PLAN
COMMENT FORM
June 6, 2013 - Open House**

I'm surprised and disappointed that the other maps available from the BLM are not also on display here. Maps such as ones showing wildlife, emphasis areas, ACECs, oil and gas areas. All of these should be of concern to the Mesa County Commissioners as well as travel maps. Wildlife means tourist dollars from people coming to the area to view wildlife or hunt for wildlife. Oil and gas workers need to have access to their working pads without worrying that someone might be holding a targeted shooting session at their pad. ACECs are often needed to protect rare plants which are better to protect before they land on the endangered list. Once on the endangered list much more strict protection kicks in resulting in more loss of public access.

Comment deadlines:

Mesa County - 12 June (mclrange@mesacounty.us)

BLM - 24 June 2013 (gifo_rmp@blm.gov)

Name (optional): Jania Shepherd E-Mail/Phone: _____
Grand Jct, 81506

LARRY R. MOYER
Petroleum Geologist
P.O. Box 1812
Grand Junction, CO 81502
970-241-3963
LRMoyer@Bresnan.net

Via Hand Delivery at Open House

Commissioner Steve Acquafresca
Commissioner John Justman
Commissioner Rose Pugliese

Mesa County Board of County Commissioners
P.O. Box 20,000
Grand Junction, CO 81501

Re: BLM Management Plans

Dear Commissioners:

I have enclosed copies of two different submittals that I prepared for the White River District of the BLM, which is my home country. Many of the same issues are present with Grand Junction Resource Management Plan.

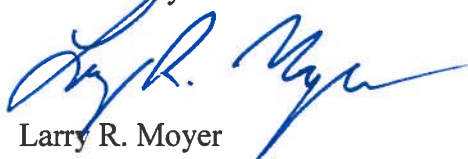
My view is that the comments are pretty much a waste of time unless one is prepared to follow it up with litigation. The Federal Land managers operate without any responsibility or accountability to the area. There is no separation of power or checks and balances.

Mesa County on the other hand can have some influence on the Federal Land managers in other ways. If there is one thing that I believe would make a large difference is to require of the Federal Managers that they submit audited financial statements that are in accordance with generally accepted accounting principles by area.

A second critical point is that there is no effective oversight to the Federal Land managers permitting operations. The coercive power of the permitting is absolute. It is a way for the personal policy preferences of the BLM activist personnel to be enforced. Some remedy must be devised.

I will be submitting some comments to you on the Thompson Divide area later, and I would appreciate a chance to make a presentation to you.

Thanks for your consideration:


Larry R. Moyer

LARRY R. MOYER
P.O. Box 1812
Grand Junction, CO 81502
970-2241-3963
LRMoyer@Bresnan.net

Via e-mail delivery:

Hsauls@blm.gov

K1walter@blm.gov

January 28, 2012

Mr. Kent E. Walter
Ms. Heather Sauls
White River Field Office
Bureau of Land Management
220 East Market Street
Meeker, CO 81641

Re: Comments on Draft Resource Management Plan

Dear Mr. Walter and Ms. Sauls:

It is with some reluctance that I am submitting the following comments on the White River Field Office, Oil and Gas Development, Draft Resource Management Plan. Over the years I have commented on numerous plans, etc., and not one time have I ever received any reply nor have I believed that my comments were seriously considered. I do, however, believe that I have a professional obligation to comment on this plan. I was raised in this part of the world and have special knowledge and experience.

On April 7, 1995 I submitted the following comment on the White River Resource Draft Management Plan:

History with
RMP's

"No determination or comparison of Values

8. During the "Scoping" process the planning issues (page 1-7) included "Comparing the public values of oil and gas development with the public values of other alternative uses which may be precluded or impacted." Also see 6/90 letter "Dear public land user" p. 3 which contains identical language and was used by the BLM during the scoping process.
 - **The RMP does not determine the value of oil and gas resources."**

On page A-81 of the June 1996 White River Resource Area Proposed Resource Management Plan and Final Environmental Impact Statement the response by the BLM to my question (480) above was:

“Response: The value of oil and gas resources are difficult to measure, as well as being very price dependent.”

This response was a bit insulting and to an extent responsible for my skeptical belief that comments to the BLM plans only serve to legitimize a flawed process and system. It is revealing though because the current RMP suffers from the same flaw.

Perspective /
Statement of
Qualifications

I am intimately familiar with the area in question and will be presenting comments from several different perspectives as follows:

- **Western Sloper** – I am a member of a Western Colorado Territorial Family that was present in Western Colorado prior to statehood and has maintained a continuous presence. I am a graduate of Meeker High School, Western State College, and the University of Colorado. I have resided in Western Colorado approximately 45 years. I have resided in Grand Junction for the past 25 years.
- **Logger & Sawmill Hand** – Having started working for my father, Dick Moyer at the age of six in his sawmill and logging operation where I was trained and educated by him. I believe that Dick Moyer, with boots on the ground, is one of the Greatest Conservationists in the history of Western Colorado.
- **Economics Student** – I hold a Bachelor of Arts in Accounting and an inactive Colorado CPA certificate. I am also co-founder and an active member of an economics study group that meets monthly in Grand Junction, CO.
- **Petroleum Geologist** – I hold an MS in Geology and have worked for 34 years as a Petroleum Geologist. I have major company experience. I have extensive work experience including “boots on the ground” in Northwest Colorado. I am also an instructor, having taught college courses and industry training courses with a worldwide scope.
- **Surface Land Owner** – I am a surface land owner in the area where the BLM controls the minerals and has them leased out.

“No one is entitled to an opinion – they are only entitled to an informed opinion – No one is entitled to be ignorant”

Believed to be from Douglas Urbanski

Point 1

I believe that the US Federal Government control of the land in Western Colorado is illegitimate.

Federal
Control

It has been alleged that President Barrack H. Obama went on an apology tour to other parts of the world where he said that America had dictated to other nations. One may accept or reject the claim – “What difference – at this point – does it really matter?” per Hillary Clinton.

Western Sloper
Perspective

What is beyond question is that the primary place where the United States Government has been dictatorial, and practiced imperialism and colonialism is in the Western States of the US. The Constitution and the statehood agreements and associated implied covenants have been breached. There is no valid reason for the US Federal Government to control vast swaths of land in the Western States.

In particular the 10th amendment to the Constitution states:

“The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people”

Further, the constitution provides that all states will be admitted on equal footing.

It is my belief that the current status of BLM administration of the lands is in no way compliant with the Constitution.

Perhaps it is beyond scope of my comments to plow the history of grievances, however, the history of the US Government seizing control of forest lands in Western Colorado is relevant. As note by Mehls, 1988:

“One reason President Roosevelt supported the interdepartmental transfer was that he was a Progressive and part of his philosophy was the belief in scientific management of all problems. Pinchot and other leading conservationists believed that applied science was basic to timber growth and usage. In 1905, these same people also proposed to develop a comprehensive plan for range lands to maximize efficient use of that resource.”

Because the lands were seized in the name of science, then I believe that the BLM has a legal and moral obligation to practice sound science.

I believe what has been promoted now is caudilloism – and yes that red mark on my throat is from someone you know.

Recommendation – Point 1

Sound Science must be involved in all aspects of the planning process.

Point 2

Practical Problems

My family oral history has highlighted the many practical objections to US Government Control of lands in Western Colorado. Of prime significance is that they way the land is administered is immoral because it wastes valuable resources and serves to impoverish the residents of Western Colorado.

Western Sloper & Economics Perspective

In particular the RMP is part of a central planning scheme. The price system is not used and opportunity costs are not considered.

Importance of

In Socialism, a definitive work on the failure of central planning, and in his later works, Ludwig von Mises demonstrated conclusively that government planners

Economics Perspective

Price System cannot succeed because information indispensable to efficient production is always decentralized and beyond anyone’s capacity to gather. Further work by F. A. Hayek (another economist of the Austrian School) and Mises showed how the price system allows the market process to solve problems and make the most efficient use of resources (Wolfram, 1999)..

Failure to Consider Opportunity Cost A companion to the price system is the concept of opportunity cost. Private property lies at the foundation of market economies because without private property, and the exchange (willing exchange, I might add) it fosters, people would be unable to consider the full costs of their decisions. The failure of the BLM to consider opportunity costs in the RMP is a glaring flaw.

The best illustration that I have ever found of how opportunity cost consideration works (as a petroleum geologist with extensive knowledge of Piceance Basin, this has special significance to me) is from Dwight R. Lee (1999a), who notes:

Economics Perspective

Opportunity Cost Considered By Audubon Society To allow Oil drilling

“Members of the Audubon Society are interested in protecting fragile habitat for birds and other animals. It is easy to predict how it would come down on a choice between protecting wildlife habitat and increasing the availability of gasoline for high-powered cars, or any other cars for that matter. For example, the Audubon Society strongly opposes offshore drilling for oil. Oil companies promise to, and in fact do, take extraordinary precautions to prevent oil spills, but the Audubon Society is not convinced. Regardless of precautions, its position is: No offshore drilling—none!

How can hot rodders possibly communicate their desire for cheaper gas to the Audubon Society so as to convince it to accommodate them by risking wildlife habitat? In fact, they have succeeded at doing just that. Hot rodders, along with all other gasoline consumers, have convinced the Audubon Society that the value they place on gas is an opportunity cost of protecting habitat that the Society shouldn’t ignore. They have done so through market communication based on private property.

The Audubon Society owns a wilderness area in Louisiana known as the Rainey Preserve. It is an ideal habitat for birds and other wildlife, but it also contains commercial quantities of petroleum and natural gas that oil companies are eager to recover. One might conclude that since the Audubon Society owns the land and can easily prevent oil companies from drilling on it, they would do so. Wrong! The Audubon Society allows oil companies to drill there.

Consideration

Of course, it requires the companies to take strong precautions against oil leaks, but not as strong as it claims to be necessary with offshore drilling. *Why the difference? Because the Audubon Society owns the Rainey Preserve, the money others are willing to pay for the oil represents an*

Of
Interests
Of
Others

opportunity that would be sacrificed if it refused to allow drilling. But the Society doesn't face an opportunity cost on offshore sites because it doesn't own them. It thus has no motivation to take the interest of others in offshore oil into consideration. (emphasis mine)

Voluntary
Co-operation

Private property not only motivates the Audubon Society to cooperate with hot rodders, it also motivates hot rodders to cooperate with the Audubon Society. Their purchase of gas (gasoline) allows the Audubon Society to obtain and protect wildlife habitat that it believes is more valuable than what it sacrifices in the Rainey Preserve because of oil drilling. *Members of the Audubon Society may despise hot rodders and hot rodders may laugh at bird watchers, but because of private property, each takes the concerns (and opportunity costs) of the other into consideration and acts to promote the other's interest.* (emphasis mine)

Political
Decisions

A further illustration of the perversities that go with Federal control of most of the lands in Rio Blanco County and the fallacy of the BLM RMP is also from Dwight R. Lee (1999b) as follows:

Economics
Perspective

“Unfortunately, many economic decisions are made not in a market setting in response to market prices, but by government in response to political considerations. This creates opportunities for the politically influential to acquire benefits paid for by the general public. Invariably, those seeking political benefits downplay the costs in the hope of justifying larger expenditures; they commonly argue that some things are so important that costs shouldn't even be considered.

Educators argue that education is too important to be considered in terms of costs; environmentalists argue that saving the earth is so imperative that environmental programs should be implemented regardless of the costs; recipients of medical research grants argue that human health trumps any crass consideration of costs; and people supported by the National Endowment for the Arts claim that the value of 'art goes to the very soul of what it means to be human' and is 'contaminated when compared with dollars and cents.'

Further
Reasons

All these statements are best understood as attempts by organized groups to capture more public money. To consider costs has nothing to do with exaggerating the importance of money. Money provides a convenient way of expressing costs, but money is not the cost of anything. When I put down a ten-dollar bill to pay for a meal, the money may appear to be the cost, but the real cost is the opportunity cost – the subjective value I forgo by spending the money on the meal rather than spending it on the most valuable alternative.

To
Consider
Opportunity
Costs

To claim that we shouldn't consider the cost of doing some things is equivalent to claiming that we should do those things without considering the alternatives. That such a transparently silly claim continues to be used in special-interest pleading illustrates the power of deception over logic in political debate. Not considering the alternatives to doing something would make sense only if it were always more valuable than anything else. But this means that we should devote all of our resources to this one thing. If it were really true that fine orchestral music, for example, was so valuable that costs shouldn't be considered, then everyone should go homeless and hungry and spend all of their time listening to orchestras in the nude. This is obviously silly, but not one bit sillier than claiming that something is so important that it is inappropriate to consider its cost.

Of course, the reality of scarcity, and the opportunity costs that result, intrude into the political process despite the special-interest rhetoric disparaging considerations of cost. Comparisons have to be made among competing alternatives, so opportunity costs are considered in the political process. Unfortunately, imperfections and biases in the political process prevent the opportunity cost of government action from being adequately considered. The result is what one should expect when alternatives are poorly considered. Waste occurs as decisions direct resources out of more valuable and into less valuable activities, and often into activities counterproductive to the stated objectives.

Market prices do not perfectly reflect opportunity costs, but one can appreciate how close they get by considering the perversities that arise because political decisions often ignore most of the costs of a policy."

In several places the RMP talks about other kinds of values, such as Wilderness Characteristics or Visual Values: Dr. Thomas Sowell in his book Basic Economics has an entire chapter on "Non-Economic Values":

Economics
Perspective

Non
Economic
Values

"Beware the people who moralize about great issues; moralizing is easier than facing hard facts. John Corry . . .

While economics offers many insights, and makes it easier to see through some popular notions that sound good but will not stand up under scrutiny, economics has also acquired the name 'the dismal science' because it pours cold water on many otherwise attractive and exciting – but fallacious – notions about how the world can be arranged. One of the last refuges of someone whose pet project or theory has been exposed as economic nonsense is to say: 'Economics is all very well, but there are also *non-economic* values to consider.' Presumably, these are supposed to be higher and nobler concerns that soar above the level of crass materialism.

Of course there are non-economic values. In fact, there are *only* non-

economic values. Economics is not a value in and of itself. It is only a way of weighing one value against another. . .

What lofty talk about ‘non-economic values’ often boils down to is that some people do not want their own particular values weighted against anything. If they are for saving Mono Lake or preserving some historic building, then they do not want that weighted against the cost – which is to say, ultimately, against all the other things that might be done instead with the same resources. . . .

In the world that people live in, and are likely to live in for centuries to come, trade-offs are inescapable. Even if we refuse to make a choice, circumstances will make choices for us, as we run out of resources for many important things that we could have had, if only we had taken the trouble to weigh alternatives.”

Recommendation - Point 2

The BLM must voluntarily agree to publish annual audited financial statements for the Resource Area – consistent with Generally Accepted Accounting Principles. The revenues from all sources within the Field Office Area and the expenditures reported, with proper Project cost accounting methods. This will promote more reason based decision making because data that is not now available can be used evaluate competing uses for the resources. The financial statements should be audited by Western Slope CPA firms so they will be familiar with local conditions.

This data can be valuable as evidenced by data that I was kindly provided by you.

2) The BLM White River Field Office (WRFO) currently administers a total of 44 Special Recreation Permits (SRP). The SRPs include 11 for mountain lion hunting, 1 for an OHV area, 2 for horse rental, and 30 for Big Game hunting. The BLM-WRFO received approximately \$19,480.00 in SRP user fees in 2010 and \$23,118.00 in SRP user fees 2011.

When it is suggested that a Recreation Based Economy is a viable option for this area, look at what the recreation generates compared to what oil and gas generates. The fallacy of the Recreation Based Economy is immediately apparent.

Point 3

Let’s you and him fight -

I believe that there is a long history of the US Government promoting conflict between various user groups. For example, take the Fort Peck Indian Reservation in Montana. What bright US Government worker decided that it would be a good idea to have the Sioux and Assiniboine tribes – ancient enemies - share the reservation? What about the Wind River Reservation with Shoshone and Arapahoe tribes?

One of my cousins tells of the time when he was working on a core drilling project

on the reservation and they had a young Native American helper. On the way back to Lander, the helper through an empty soda can out the window. When challenged on why he did that, the reply was “it’s Shoshone land”.

When I challenged a worker in the Colorado Fluid Minerals branch for answers to why it is that Environmental Organizations are given automatic standing in challenging oil and gas leases it was told “They are just doing their business, too”. Well they are a favored group, because they have nothing at stake financially, they have no skin in the game, there is no symmetry. The recognition of various stakeholders in the normal practice of BLM management is fundamentally unfair. It is my understanding that the BLM runs a money laundering operation whereby the BLM ends up supporting the Environmental Organizations by paying exorbitant legal fees to attorneys that take cases on a contingency fee arrangement. The attorneys then make contributions to the Environmental Organizations. They do not even have to win and cases for the money to flow.

It is worse than that. The Western Watersheds Project successfully ran a shake-down operation with the Ruby Pipeline by threatening a lawsuit late in the game. El Paso, if my memory serves me correctly, caved and paid over \$20 million. This is thuggery.

I submitted a request to a public affairs specialist that was present at the open house in Grand Junction to be informed of the amount of money paid to environmental organizations attorneys during the past 15 or so years for the Northwest Colorado District. He forwarded my request to the FOIA people. That is totally unsatisfactory to me. I did this to prove a point – the BLM is not doing their job and they should have had this data at their finger tips. I have no intention of scrubbing this out at my time and expense. That is the job of the BLM. I can understand why they do not want to publish this information.

*“Without honesty
there can be no
civilization”*

When did the money paid to the attorneys or the Western Watershed Project ever feed a hungry child in Western Colorado?

The current state of affairs certainly supports my belief that the BLM promotes conflict, and the environmental organizations are not acting in good faith because they are not honest about their intentions.

It is the goal of many environmental organizations to destroy the private economy and in particular the oil and gas industry. The claim to concern for the environment is just a convenient means. “The fish will be destroyed”.



2009, My fishing buddy on Piceance Creek – Yes that is a Drilling Rig

I believe that it is the goal of many environmental organizations to destroy the private economy and in particular the oil and gas industry. Even the Sierra Club recently started attacking natural gas. The claim to concern for the environment is just a convenient means. It is proper to question the motivation and intentions of the Conservationists and Environmentalists, which are called into question by Dr. George Reisman (1996) in Capitalism as follows:

“Man is always and everywhere a blight on the landscape”
John Muir,
founder of the
Sierra Club

“We are not interested in the utility of a particular species, of a free-flowing river, or ecosystem to mankind. They have intrinsic value, more value – to me – than another human being, or a billion of them.”
David Graber,
Biologist with the
U.S. National
Park Service

“Honorable representatives of the great saurians of older creation, may you long

Reds

And

Greens

“The only difference I can see between the green movement of the environmentalists and the old red movement of the Communists and socialists is the superficial one of the specific reasons for which they want to violate individual liberty and the pursuit of happiness. The Reds claimed that the individual could not be left free because the result would be such things as “exploitation,” “monopoly,” and depressions. The Greens claim that the individual cannot be left free because the result will be such things as destruction of the ozone layer, acid rain, and global warming. Both claim that centralized government control over economic activity is essential. The Reds wanted it for the alleged sake of achieving human prosperity. The Greens want it for the alleged sake of avoiding environmental damage and for the actual, admitted purpose of inflicting human misery and death (which was also the actual, but un-admitted purpose for which the Reds wanted it). Both the Reds and the Greens want someone to suffer and die; the one, the capitalists and the rich, for the alleged sake of the wage earners and the poor; the other, a major portion of all mankind, for the alleged sake of the lower animals and inanimate nature.

Thus, it should not be surprising to see hordes of former Reds, or of those

who otherwise would have become Reds, turning from Marxism and becoming the Greens of the ecology movement. It is the same fundamental philosophy in a different guise, ready as ever to wage war on the freedom and well-being of the individual. In seeking to destroy capitalism and industrial civilization, both movements provide ample potential opportunity for those depraved individuals who would rather kill than live, who would rather inflict pain and death than experience pleasure, whose pleasure comes from the infliction of pain and death.”

enjoy your lilies and rushes, and be blessed now and then with a mouthful of terror-stricken man by way of a dainty!”
John Muir’s
Benediction to
Alligators

Consensus not possible

The complicity of the BLM to recognize the environmental organizations as stakeholders when they have nothing at stake and are never asked to mitigate any damage and loss that their actions cause is irresponsible. Many of these groups do not even have any local foot print – no boots on the ground. The entire stakeholder model is suspect. The fallacies of the stakeholder model for determining uses of collectively owned property i.e. “the public lands” are similar to and well explained by Barry (2000) in a critique of the stakeholder model for the corporation as proposed by Evan and Freeman (1993):

“Isn’t the only hope for the planet that the industrialized civilizations collapse? Isn’t it our responsibility to bring that about”

Critique of Stakeholder Model

“...There is a very simple problem that lies at the heart of all stakeholder theory: how can the potentially conflicting demands of the various stakeholder groups be coordinated? There is no problem here in the Anglo-American model (unencumbered by stakeholders), for although the participants in an enterprise will have different views on how it should be run, what investments to make, what divestitures to effect, and so on, they are ultimately harmonized and put to the test of experience through the price mechanism. That is not the case with a stakeholder corporation, for there is no common scale of values, no surrogate for the price mechanism, but only incessant bargaining between, in essence, political groups that will likely have no immediate financial interest in the company.

Maurice Strong,
Head of 1992
Earth Summit in
Rio de Janeiro

Despite openly declaring that ‘The very purpose of the firm is to serve as a vehicle for stakeholder interests,’ Evan and Freeman (1993) are at least aware of this problem, though *their proposed solution to this is laughable. To resolve conflicts between competing stakeholder groups, they recommend the appointment of a ‘metaphysical director’ to adjudicate between rival groups.*” (emphasis mine)

Sign me up – I believe that I am the most technically competent person available to be the metaphysical director.

The current state of affairs with respect to all Federal lands is aptly summarized by George C. Leef (1999), who writes:

Results
Of
Federal
Land
Management

“What if there is no real owner with an interest in maintaining the property? That’s the case with ‘public property,’ which really does not belong to any individual or group. Management of public property depends on the choices of politicians and bureaucrats who stand to gain nothing from making ‘right’ decisions (those that make the best use of it) and to lose nothing from making ‘wrong’ decisions (those that make less than optimal use of it). Political-bureaucratic management predictably leads to neglect of property entrusted to public officials in favor of spending that benefits them more in the currency of politics: influence, power, and prestige.”

Road
To
Serfdom

In the larger scheme of things, I believe it is vital to reverse the trend of more collective ownership of land in Rio Blanco County. The dark side of statism and collective ownership, was recognized by F. A. Hayek (1944) in *The Road to Serfdom*. In discussing Hayek’s work, Lawrence W. Reed (1998) notes:

“When Hayek wrote his best-known book in 1944, the world was captivated by the notion of socialist central planning. While almost everyone in Europe and America decried the brutality of nazism, fascism, and communism, public opinion was being shaped and molded by an intelligentsia which held that those ‘excesses’ of socialism were avoidable exceptions. If only we make sure the right people are in charge, said the statist intellectuals, the iron fist will dissolve into a velvet glove.

Explanation of
poor
Performance

Those who, in Hayek’s words, ‘think that it is not the system which we need fear, but the danger that it might be run by bad men,’ are naïve utopians who will forever be disappointed by the socialist outcome. Indeed, this is the history of twentieth-century statism—the endless search for a place where the dream might actually be made to work, settling on a spot until disaster is embarrassingly apparent to all, then blaming persons rather than the system and flitting off to the next inevitable disappointment. Perhaps someday, the dictionary definition of ‘statist’ may read, ‘someone who learns nothing from human nature, economics, or experience, and repeats the same mistakes over and over again without a care for the rights and lives of people he crushes with his good intentions.’

Abuse of
Authority

“Even the worst features of the statist reality, Hayek showed, ‘are not accidental byproducts’ but the phenomena that are part and parcel of statism itself. He argued with great insightfulness that ‘the unscrupulous and uninhibited are likely to be more successful’ in any society in which government is seen as the answer to most problems. They are precisely the kind of people who elevate power over persuasion, force over cooperation. Government, possessing by definition a legal and political monopoly of the use of force attracts them just as surely as dung draws flies. Ultimately, it is the apparatus of government that allows them to wreak their havoc on the rest of us.”

Can I say Secretary Salazar, Secretary Chu, and Administrator Jackson?

I believe that the conflicts are promoted in part to avoid responsibility and accountability for use and productivity of resources they are charged with administering.

"Never let a crisis go to waste"
Rahm Emanuel

Personal
Experience

My family and I have first hand experience with the sharp end of the stick. My father, Dick Moyer, worked with his father to cut logs for Ira Langstaff in the vicinity of Triangle Park. After being discharged from the US Navy following WWII he worked as a sawyer and log cutter in many places.

Loggers
Perspective



**Dick Moyer age 12 with Engelmann Spruce near Triangle Park 1938
(This was part of one of the finest Engelmann Spruce forests in the USA,
which was later mostly killed by bark beetles in the late 1940's ~ 5 billion
board feet lost)**

By the time he started his own sawmill on the Grand Hogback north of Rio Blanco and moved to Meeker in 1960 (the summer before I started first grade), I had lived in at least 10 different places in Colorado, Utah, Washington, New Mexico and Arizona.

I grew up working for my parents in their sawmill and logging operation west of Meeker. For the first three years, the mill was located in the woods and mules were used to skid logs to the mill. I worked in the mill and woods through 1976 until I had graduated from college. As the years went by, the equipment was improved.

The White River valley and the White River National Forest were known for having timber resources of exceptional quality. There was also a diversity of timber including Douglas Fir, Engelmann Spruce, and Lodgepole Pine.

The lessons and experience of the loss of the Engelmann Spruce to bark beetles on the White River Uplift and Flat Tops area in the late 1940's ~ 5 billion board feet of timber – were ignored.



Loading Jack and Judy – 1960



The old GI 6x6

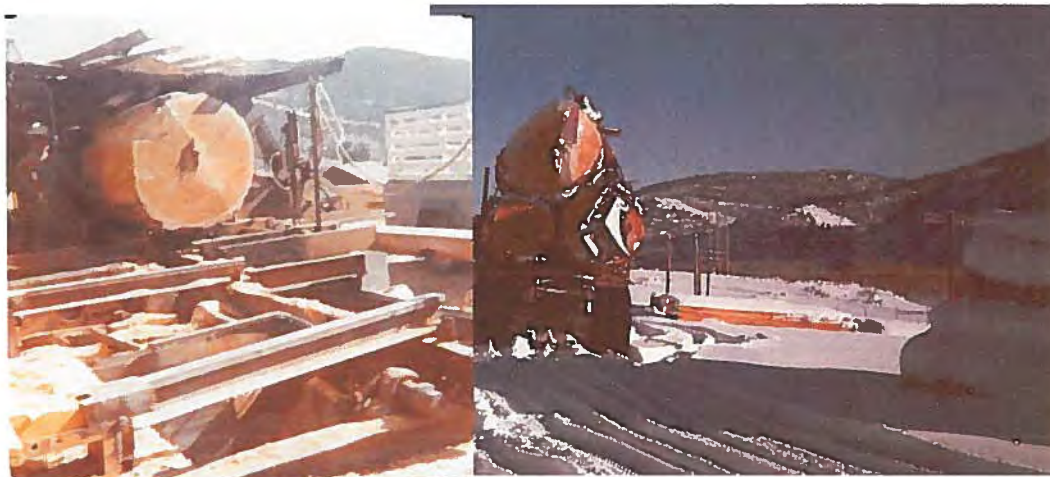


Dick Moyer Sawing



The F-8 Ford ~ mid 1960's

The “new” sawmill had a distinctive configuration with a top saw and a vertical edger, which facilitated sawing large logs. It could also cut long logs up to 32 feet in length.



Sawing big Douglas Fir – 1974

A load of real logs ~ Date ??



Detail of Sawmill with top saw and vertical edger

At one time, this little sawmill cut the most lumber of any sawmill from the entire White River National Forest. It cut in the range of 500 thousand to 1 million board feet of lumber. Many of the timber sales were in association with efforts by the US Forest Service to control bark beetles in various areas of the White River National Forest.

To grasp the scale of destruction of the 5 billion board feet of Engelmann Spruce timber in the White River National Forest in the late 1940's, it would have taken

5,000 to 10,000 years for this mill to process that much timber volume.

As a consequence of the concerted and sustained assault on the Forest Products Industry in the Rocky Mountains by the Environmental Industry that started in the 1970's, this sawmill has not operated commercially for ~ 19 years because there was no supply of timber at any price much of the time and none at prices that allowed any kind of reasonable operating profit.

Some in the US Forest Service actively supported and cooperated with the Environmental Industry in their efforts to stop logging (others, especially old timers are profoundly embarrassed). Recall the fabled below cost timber sales and protests and lawsuits at every turn. **They won.** The timber industry in the Rocky Mountains was for all practical purposes destroyed.



The mill today – a practically worthless hunk of junk

What is the state of the forests in Colorado now? With no consideration of the beneficial effects of logging on forest health, the forests in the Rocky Mountains have been destroyed by a predictable beetle infestation.

The BLM participated in this destruction. At times, we logged on the BLM. When the BLM blew off the loggers, the health of the forest lands on the BLM also went south.



2011 – Willow Creek Pass – The stands of green trees are the spots where logging took place so a young healthy stand of timber is present.

Recommendation – Point 3

Within the context of publishing audited financial statements, the details of payments to environmental organizations must be disclosed.

If the environmental organizations are “just doing their business” as I was told, then some disclosure and transparency is in order, and their membership lists, financial statements, and donor records should be made public.

Point 4 Responsible Management of Oil and Gas Revenues from severed minerals – The BLM is milking the cow in Rio Blanco County but not feeding it.

Landowner
Perspective

I believe the way the BLM administers Oil and Gas Revenues from severed minerals is immoral. In the first place, as noted in Point 1, there should be no severed Federal Minerals. The lands out west were not treated the same as other places.

I believe that I was stiffed by the BLM when I did not get some share of the \$230 per acre for the oil and gas lease bonus.

This is the source of tremendous conflict and pits interests against each other. It is truly a thumb in the eye to private surface owners when the BLM contributes ~ half of the Oil and Gas Lease Bonus, Rentals, and Royalties to the State of Colorado.

Larry R. Moyer

The collectivists have worked their magic to willfully sever the links of property rights and there is no consideration of opportunity cost.

This is also part of the willful effort to keep people fighting among themselves.

Recommendation – Point 4

The BLM should transfer ownership of the severed minerals to the current surface owners. If that doesn't happen, then the BLM should voluntarily split the revenue with the surface owner obtaining 25% and the county 25%.

Point 5 The RMP contains No Resource Characterization or Resource Assessment of the Oil and Gas Assets.

Honestly, I do not understand how this can be? The RMP has voluminous characterization of other kinds of resources.

The lack of a Resource Characterization and Assessment for oil and gas means that the RMP does not meet any reasonable standard of best practice nor does it meet criteria in *Reference Manual on Scientific Evidence* where rules on the reliability of scientific evidence consistent with the Supreme Court opinion in *Daubert v. Merrell Dow, 509* where rules were set out.

Further, Map 1-4 “Oil and Gas Potential, Mesaverde Play Area” is a bit misleading. The line showing the Mesaverde Play area is not what was used by the USGS in DDS-69b. While I can quibble about the exact placement of the lines for the various potential, there is no mention of the Mancos formation potential or other deeper potential. It should be clearly pointed out that the Mesaverde Play is not the only viable play. As recent drilling has demonstrated, the Mancos Play will probably contain substantially larger reserves than the Mesaverde.

Without having some idea of the values involved, reason and critical thinking can not be applied to the decisions based on the best use of the resources. The supporting arguments for Points 2 and 3 previously discussed are absolutely applicable here. If “That’s the Way We Do It” as I have been told by former BLM personnel then there is reason to know that the area will be poorer.

Tell me, how is it possible to impose various restrictions such as “No Surface Occupancy” or “Timing Restrictions for Wildlife” when there is no understanding of the relative values of competing uses?

This is not consistent with the “Custom and Culture” of the residents of Rio Blanco County. Believe me, we know the value of oil and gas. This swerves into the entire realm of Regulation without Representation. As I have been told, the NEPA

is only 17 pages, but the associated regulations are over 1,000 pages. This plan does nothing to control or influence the application of Regulations that do not meet any kind of favorable cost benefit relationship or applies concepts that are not part of the “Custom and Culture” of the area.

Recommendation – Point 5

Do a full blown Oil and Gas Resource Characterization and Assessment and then use it when deciding conflicts with different uses.

Point 6 Best Practices

While the application of Best Practices and Certifications in the oil and gas industry is an ongoing and positive trend, should it not be also applied to the BLM as well?

It was confirmed that not one Colorado Registered Engineer was involved with this RMP. What’s up with that? This is consistent with the Imperialism practiced by the US Government. With all the detailed rules and requirements in the RMP relating to oil and gas development, don’t you think an engineer should be involved? How can practices be imposed with no idea of technical feasibility?

I would think that since there are places where private mineral rights and private surface are involved with the Federally Regulated operations that it would be important to have properly credentialed personnel involved. Some of the BLM staff are practicing engineering in Colorado without a license. It is not a Best Practice to hide behind sovereign immunity to avoid responsibility and liability.

From what I can tell, not one Petroleum Engineer or Petroleum Geologist was involved with the RMP. As noted in Point 6 above, I do not see how the RMP can meet criteria in *Reference Manual on Scientific Evidence* where rules on the reliability of scientific evidence consistent with the Supreme Court opinion in *Daubert v. Merrell Dow, 509* where rules were set out.

It is understandable then that the RMP is weak on subsurface Best Practices. It is known that throughout large parts of the basin, cementing of the surface casing is very difficult and may take special procedures to obtain adequate cement placement.

Recommendation – Point 6

As a courtesy to Colorado, the BLM should use Registered Engineers.

Investigate specific needs for cementing surface casing to protect ground water. Insure that proper bond logging is done and accurate interpretation of cement bond

is validated.

Point 7 Hydrologic Characterization does not use all available data

On Map 3-1 a number of known water monitor wells are not shown. This suggests that all available water monitor well data has not been incorporated into any Hydrologic Interpretations.

Recommendation – Point 7

Collect all of the water monitor well data available in the Piceance Basin and use it.

Point 8 The Sage Grouse Assessment does not include Historical Data and Consider the Impacts of Other Laws on the status of populations

I believe that the listing of the Sage Grouse is being used as a stalking horse by the environmental industry to cripple the oil and gas industry. Just as the Spotted Owl was used decades ago to destroy the timber industry in the Northwest, I believe the Sage Grouse efforts are based on incomplete or flawed science and reasoning.

The ratchet effect has done its work – the loggers are gone, and the Barred Owl has been recognized as a significant factor in Spotted Owl status. There may in fact be plans afoot to kill some of the Barred Owls. “What difference – at this point – does it really matter”

In the Federal Scheme of things, the impact of predators is not considered, so the model is not consistent with reality. Historical Facts are often not considered in the government centric world. The Law of Unintended Consequences is never considered.

The custom and culture of the people of Northwest Colorado was to recognize the negative impact of predators to their lives and to take significant steps to control them. This is a historical fact.

I offer the following:



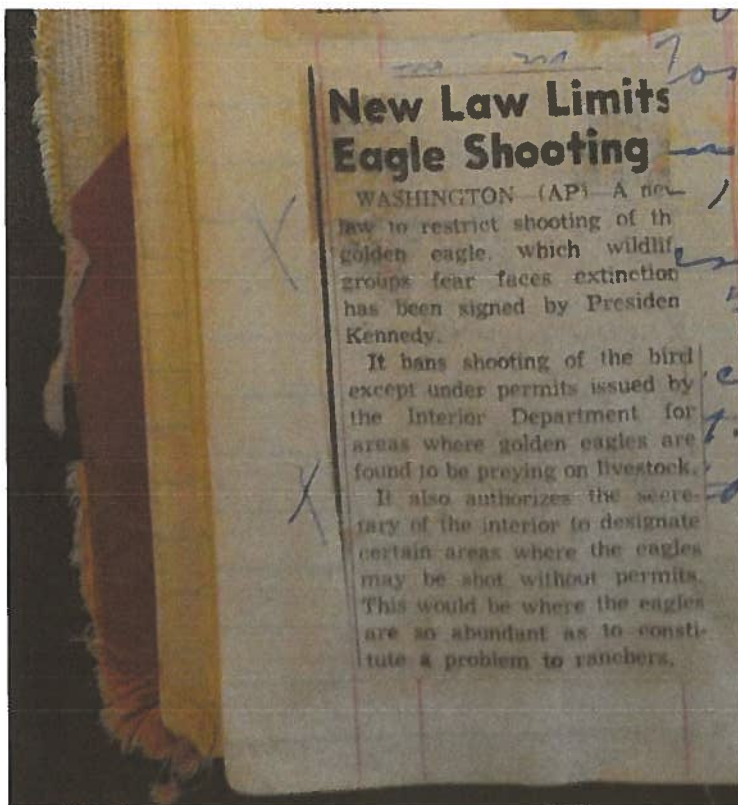
Oscar Dudley and others at Hunting Camp, Location Unknown, Probably some time between 1900 & 1920

Now, they would all be in Federal Prison for the birds and the bobcat or lynx. They killed the predators. This is likely in Piceance Creek.

It is noted that Oscar Dudley, one of my great uncles, was the son of one of the original homestead families on Piceance Creek. In fact the “Dudley Bluffs” are in the vicinity of their home place.

The Federal laws that have been enacted such as the Migratory Bird Act changed the predator control efforts. At one point, Rio Blanco County offered bounties for birds. Magpie heads were worth 5 cents and eggs a penny. This had an impact on the predators of the Sage Grouse.

The changing Federal Laws related to killing predators were so significant that the following image is of a clipping posed by my late grandmother in her scrapbook.



Even this article acknowledges the role of predator control.

I believe it is bad faith for the impact of predators to not be honestly dealt with.

Recommendation – Point 8

It is important to understand the concept of dynamic equilibrium. This controls

many things in nature.

The impact of laws that protect predators of the Sage Grouse by considered. It is immoral to use the Sage Grouse Endangerment to destroy the oil and gas industry while nothing is done to change the laws that have directly related to the demise of the Sage Grouse.

Point 9 Wilderness Designations

It appears that the new wilderness inventories are a clear case of regulation without representation. Further, the environmental organizations appear to be favored in doing their business as suggested by a recent newspaper article by Webb, 2013 indicates:

“. . . northwest Colorado wildlands coordinator with the Wilderness Society, said it occurred because the BLM’s Little Snake Field Office hadn’t done required recent inventory of possible lands with wilderness characteristics in the area of the lease parcels.”

I believe that the wilderness character assessments are not consistent with the customs and culture of the residents of Rio Blanco County. Did the BLM coordinate with the Wilderness Society or use any of their members in the 28 or so new areas on Map 3-19? How many times do things get examined?

I am familiar with and have been on the ground in areas 9, 11, 12, 13, 14, 15, and 17. Roads are present there as indicated by the Colorado Oil and Gas Commission web site, along with some oil and gas wells or dry holes. What about oil shale core holes in the area?

The net effect again is the ratchet effect that the environmental industry has effectively used over the years. So, “What difference – at this point – does it really matter?” It is very significant.

Have the evaluators that determined the wilderness character for units 9, 11, and 12 received proper diversity training on the “Custom and Culture” of Rio Blanco County? No many of us believe that we are in a “wilderness” area when we have the dust from the road blowing in our face.

This process just keeps adding more wilderness. Where is the reason and rational thinking and science? Was bad faith involved here because of a lack of honesty and transparency?

Recommendation – Point 9

To mitigate the impacts of the forever in limbo wilderness lands I propose that access to these areas by the general public be by permit only. This will insure

accurate use statistics and form a data baseline for making a rational decision for what the best use of the lands are.

Further, I believe that to mitigate the impacts, the BLM should voluntarily agree to pay the school district and Rio Blanco County each \$2 per acre per year with an annual escalation of \$2 per year for all of these wilderness areas where some other uses are denied.

Point 10 Mule Deer

I believe that the Mule Deer Populations reported in Table 3-17 do not meet criteria in *Reference Manual on Scientific Evidence* where rules on the reliability of scientific evidence consistent with the Supreme Court opinion in *Daubert v. Merrell Dow, 509* where rules were set out.

I was kindly provided the reference document, and this turns out to be a comment from a DOW person. This data is not published that I have found. I have done extensive literature searches on the White River Deer herd and have found no corroborating data.

In a newspaper article by Webb, 2012, the White River herd was referred to as the state's largest migratory herd. I am interested in where the data is for this kind of resource characterization.

I have attached papers by Wright, 1940 and Bartmann, 1971 where some characterization of Mule Deer is presented. How does the current herd differ from the prior characterization? The 106,000 number for the White River Herd is 2006 is probably twice as high as the historic representation.

I understand that the BLM manages the habitat and the Colorado DOW manages the game. I believe that this diversification only serves to limit accountability for the resource.

Further, I believe that hunting is the dominant influence on Mule Deer. Also, since the elk population in the Piceance Basin was not established until after 1949 in some parts and into the 1970's in most of it, the elk are an invasive species and damage the Mule Deer. Check out the history of the elk hunting seasons in the Piceance Basin for corroboration.

In my own personal experience, the Mule Deer in the area are to be found in the vicinity of human habitation. I think predators play a part in this.

Because of the uncertainty of the Resource Characterization and Resource Assessments for all wildlife, the timing limitations for drilling are suspect. In some cases, the actual hunting seasons might be longer than the drilling seasons.

Recommendation – Point 10

It is critical to have fact based scientific data to make decisions with, so I recommend a Resource Assessment and Characterization to be undertaken by the BLM that will be consistent with best practices, including only accepting data from peer reviewed publications..

Conclusion

I believe that the resources of the area are too important to be controlled by the warlords in Denver or Washington D.C. I challenge each and every person to make wise decisions that promote prosperity.

When bad faith is exhibited because of a lack of honesty, it must not be tolerated. While it may now be accepted that political people are allowed to lie, honorable people do not do that. If what I have presented is in error, please let me know.



The image above is of my father's school class in 1934. If we are forced to have the kind of carbon footprint that they did, we will look like they do

Respectfully submitted,

/s/ Larry R. Moyer

Larry R. Moyer

Attachments

Wright, 1940 –
Bartmann, 1971
Freddy, 1987

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MIGRATION CENSUS OF MULE DEER IN THE WHITE RIVER REGION OF NORTHWESTERN COLORADO

Edward Wright and Lloyd W. Swift

Students of game management have long known of a method to obtain estimates of game populations through track counts. Ordinarily, the application of this method depends on two things: (1) A snow or soil surface on which the tracks are readily distinguished; and (2) a movement of the game animals over the area where the count is to be made.

In western Colorado, the seasonal migration of the great White River mule deer herd provided an opportunity to apply the track count method of census. The extreme migration of the herd from summer range on the White River National Forest to the winter range on Grazing Service Colorado District No. 1 approaches eighty miles, with perhaps the average distance being fifty.

The yearlong range includes a large hourglass-shaped area between the Colorado River and the White River. During the spring and fall migrations, the deer tend to concentrate in the central, narrower portion, which is traversed by the road between the towns of Rifle and Meeker. Hence, the mass movement of the mule deer over the unpaved roadway gave ideal conditions for recording (Table 1; Figure 1) the migratory deer population.

Although the possibilities were realized for a number of years, it was not until 1938 that an attempt was made by the United States Forest Service to conduct a track count of the White River deer herd. The enumeration was incomplete, but demonstrated the practicabil-

ity of the method and provided the basis for a very successful deer-track count during the spring of 1939, which is here reported upon.¹

The count was taken each morning after obliterating the tracks of the previous day by dragging the road with pinon trees chained together and pulled by a truck. Tracks not reached by the drag were blotted out by men carrying an old broom or a piece of brush.

The road was divided into two-mile sectors that were numbered from the north; two men assigned to each. Counts were made early each morning during the migration, or from April 26 to May 31, 1939. During this period, a total of 28,207 deer tracks was recorded on the roadway. Table 1 itemizes the daily counts.

Some of the findings of the track count were:

1. Only rarely did a deer travel in the opposite direction to the general migration trend. When this occurred, the tracks were subtracted from the sector total for the day.

2. The tracks were usually individual and distinct, since a group of trailing deer would disperse at the roadway and cross without disturbing the other tracks.

3. The deer generally crossed where vegetation or land features provided some degree of shelter.

4. Generally, the deer tended to go around open and farmed areas. This ac-

¹ The Colorado Game and Fish Department cooperated in this work.

counts for Sector 7 being less used than 6 and 8.

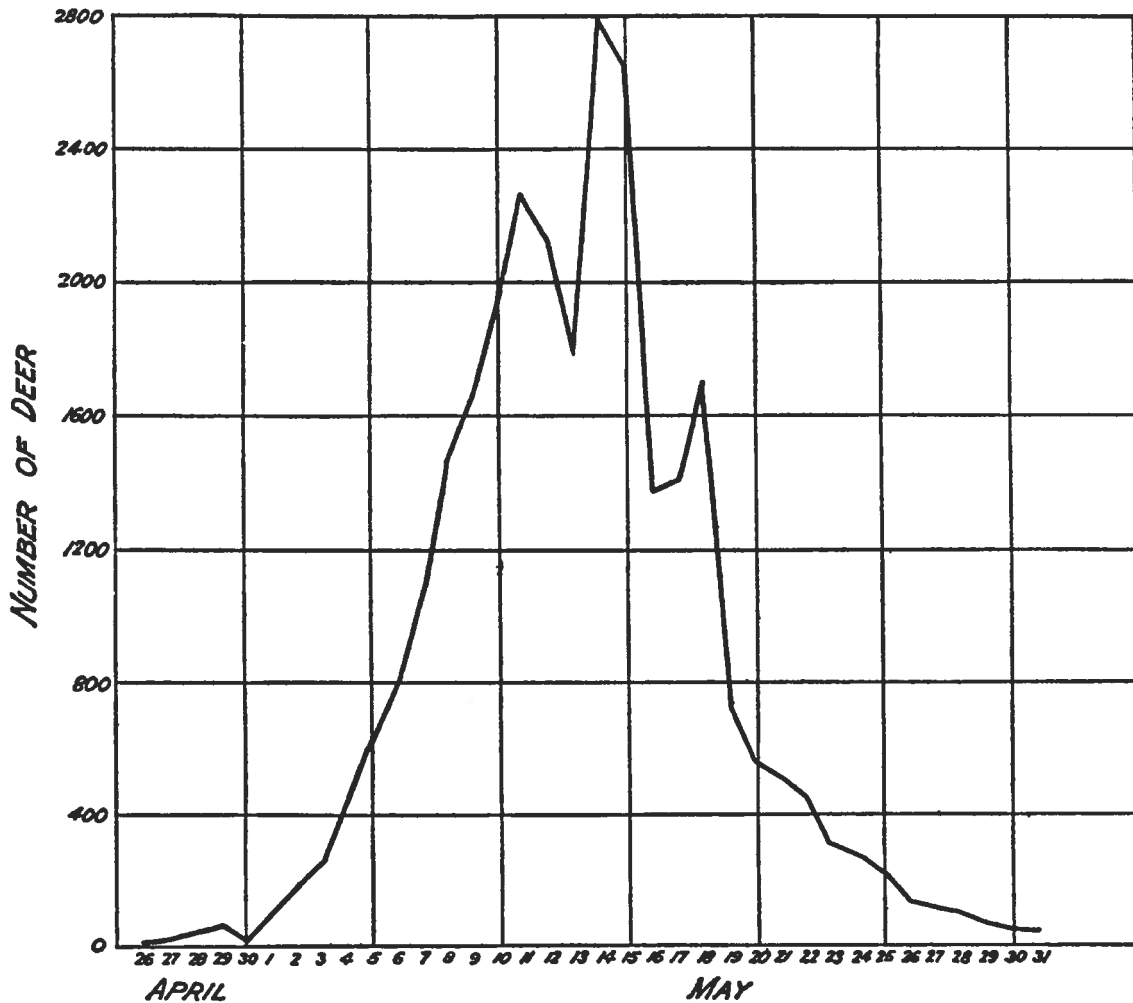
5. The greatest number crossed during the early morning.

6. It was found that the deer did not stop after crossing the road, but moved

ing down of the migration; note counts for April 30, and May 12, 13, 16, and 17.

9. The migration first reached full volume at the lower elevations and gradually progressed to the higher areas. This explains the shift in the count from

DAILY COUNT OF MULE DEER TRACKS ON RIFLE - MEEKER ROAD DURING 1939 SPRING MIGRATION



on several miles toward their summer range.

7. The does and yearlings started to migrate before the bucks.

8. It was observed that a drop in temperature, especially if accompanied by stormy weather, resulted in a slow-

the lower numbered sections to the larger ones as the census period advanced.

10. The migration got under way slowly, then increased rapidly to a peak, after which it decreased sharply, as indicated by the graph.

TABLE 1
 TABULATION OF TRACKS BY DAY AND SECTOR TO SHOW TOTAL NUMBER
 OF DEER CROSSING RIFLE-MEEKER ROAD DURING 1939
 SPRING MIGRATION

Date	Sector Number											Daily Total
	1	2	3	4	5	6	7	8	9	10	11	
April 26			3	2								5
27												#27
28			15	33							1	49
29		7	17	25	2					5	1	57
30					3	2	2					7
May 1												
2	2	50	34	27	19	7		15		10	2	166
3	30	23	56	57	17	8	2	15	17	6	7	238
4	30	†116	75	115	34	12		22	14	4	21	443
5	†30	†83	†110	176	44	46	11	65	38	3	24	630
6	46	79	127	185	50	30	†24	128	75	3	44	791
7	3	99	140	359	54	96	3	137	145	4	31	1,071
8		120	262	343	162	73	29	219	159	8	87	1,462
9	57	108	151	286	153	143	66	292	230	41	127	1,654
10	81	75	174	183	335	203	80	340	220	74	181	1,946
11	37	135	198	452	244	197	82	397	276	71	176	2,265
12	54	95	230	308	186	214	137	332	384	81	105	2,126
13	20	46	114	222	112	173	†117	380	325	97	187	1,793
14	60	80	205	250	195	118	101	617	760	170	240	2,796
15	64	76	92	288	186	147	71	630	595	176	323	2,648
16	6	28	33	103	46	68	28	495	350	113	99	1,369
17	21	20	36	129	40	83	31	430	325	137	161	1,413
18	12	17	19	32	103	54	34	678	515	113	138	1,715
19	3	6	24	48	38	52	28	152	165	76	121	713
20	5	15	23	82	86	11	9	91	93	60	78	553
21	5	15	7	53	68	21	5	79	102	73	87	515
22	8	6	16	52	31	17	7	80	87	68	76	448
23	3	6	16	22	17	19	2	31	85	46	49	296
24	2	1	3	32	24	19	4	37	96	25	29	272
25				16	11	11	9	45	69	25	37	223
26				11	11	10		5	12	25	57	131
27				1	2	10		27	16	36	26	118
28						5		21	22	21	31	100
29						6		12	17	2	35	72
30								9	14	17	10	50
31								13	8	8	16	45
Totals	579	1,301	2,180	3,892	2,277	1,856	882	5,794	5,241	1,598	2,607	28,207

† Check lost because of sheep; figure used is average of adjoining sectors.
 # Figure used is average of preceding and following days.

A much more accurate count was obtained by this method than by any other that had heretofore been tried in the area. It is believed this census method

is particularly worthy of consideration in regions whose physical features and migration characteristics are similar to those in the White River territory.

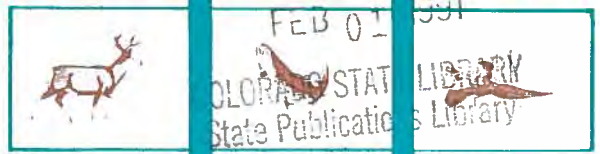
Edward Wright
 Lloyd W. Swift
 U. S. Forest Service
 Denver, Colorado

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Outdoor Facts

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Game Information Leaflet

Number 84

EVALUATION OF THE PICEANCE CREEK MEADOW DEER COUNT^a

Each spring since 1947, personnel of the Colorado Division of Game, Fish and Parks have systematically counted mule deer on the meadows and bottomlands of the Piceance Creek drainage southwest of Meeker, Rio Blanco County (Fig. 1). The counts were made on the assumption that they would be indicative of trends in deer numbers on the highly important Piceance Creek winter range. The purpose of this leaflet is evaluation of the relationship between annual counts and apparent deer densities, or the validity of the assumption.

MEADOW COUNT PROCEDURES

When initiated, the meadow count consisted of 16 routes totaling about 135 miles (Fig. 2). Two men, a driver-counter and a counter, were assigned to each route. Binoculars were used

and all deer seen on the meadows and adjacent hillsides were tallied. Counts were made on two consecutive evenings beginning about one-half to one hour before dark. The highest of the two totals was used. Counting dates varied from April 3 to April 29, most occurring near mid-month. In later years preliminary counts were conducted to help in estimating the time when the peak number of deer might be observed.



Fig. 1. Prior to migration to summer range, mule deer congregate each spring on meadows along Piceance Creek and its tributaries. (Photo by Don Domenick)

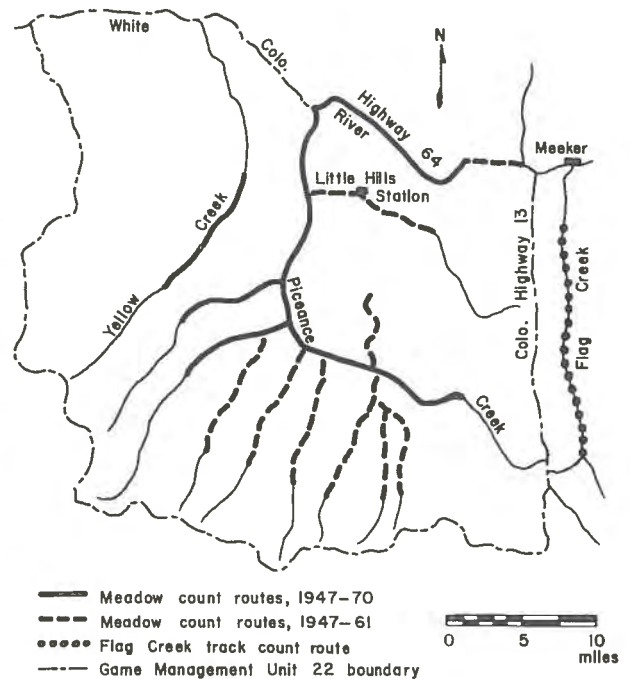


Fig. 2. Approximate locations of Piceance Creek meadow deer count routes and the Flag Creek track count route, Rio Blanco County, Colorado. (Drawing by Richard M. Bartmann)

Since 1960, only 8 (about 60 miles) of the 16 original routes have been counted, thus reducing manpower requirements. Results were projected for comparison with previous totals. In the following, data for only the eight routes currently recorded are used to avoid possible error in such projections.

^a Contribution from Federal Aid Project W-38-R

DEER POPULATION DENSITIES

There is little information concerning deer population densities on the Piceance Creek winter range. During the late 1940's and early 1950's, a period of presumably high deer numbers, track counts were obtained during the spring along dirt roads bisecting migration routes between winter and summer range (Fig. 2). A high of 24,636 sets of tracks were counted in May, 1951, along a 15-mile segment of the approximate 45-mile-wide route (Campbell 1951). Track counts were discontinued after 1953.

Annual harvest data estimated from hunter report cards are the only available information possibly indicative of the trend in deer numbers. Combined harvest data from game management units 22, 23 and 24 are used in the following evaluation. These three units probably contain most of the deer wintering in the Piceance area during the hunting seasons.

RESULTS AND DISCUSSION

Two approaches are used in evaluation of the meadow-count data. The first considers the

relationship between meadow counts and the first deer harvest the following season. The second explores the effect of the total deer harvest on the meadow count the following spring. Meadow count and deer-harvest data are graphically portrayed (Fig. 3). The long-term trend in the deer population, as depicted by the meadow count, may seem reasonable because the estimated kill increased irregularly from the late 1940's to the mid-1960's, while the meadow count showed an irregular decline. This hypothesis is examined in the following.

Meadow Count-First Deer Harvest

Two factors exert a major influence on the relationship between the meadow count and the first deer harvest the following season. One is varying annual deer productivity. Fawn:doe ratios of estimated harvests in game management units 22, 23 and 24 are used to assess the variation in annual productivity because no other data were available for other preferred production indices. Chi-square analyses of hunter report-card data for 1948 through 1969 show that

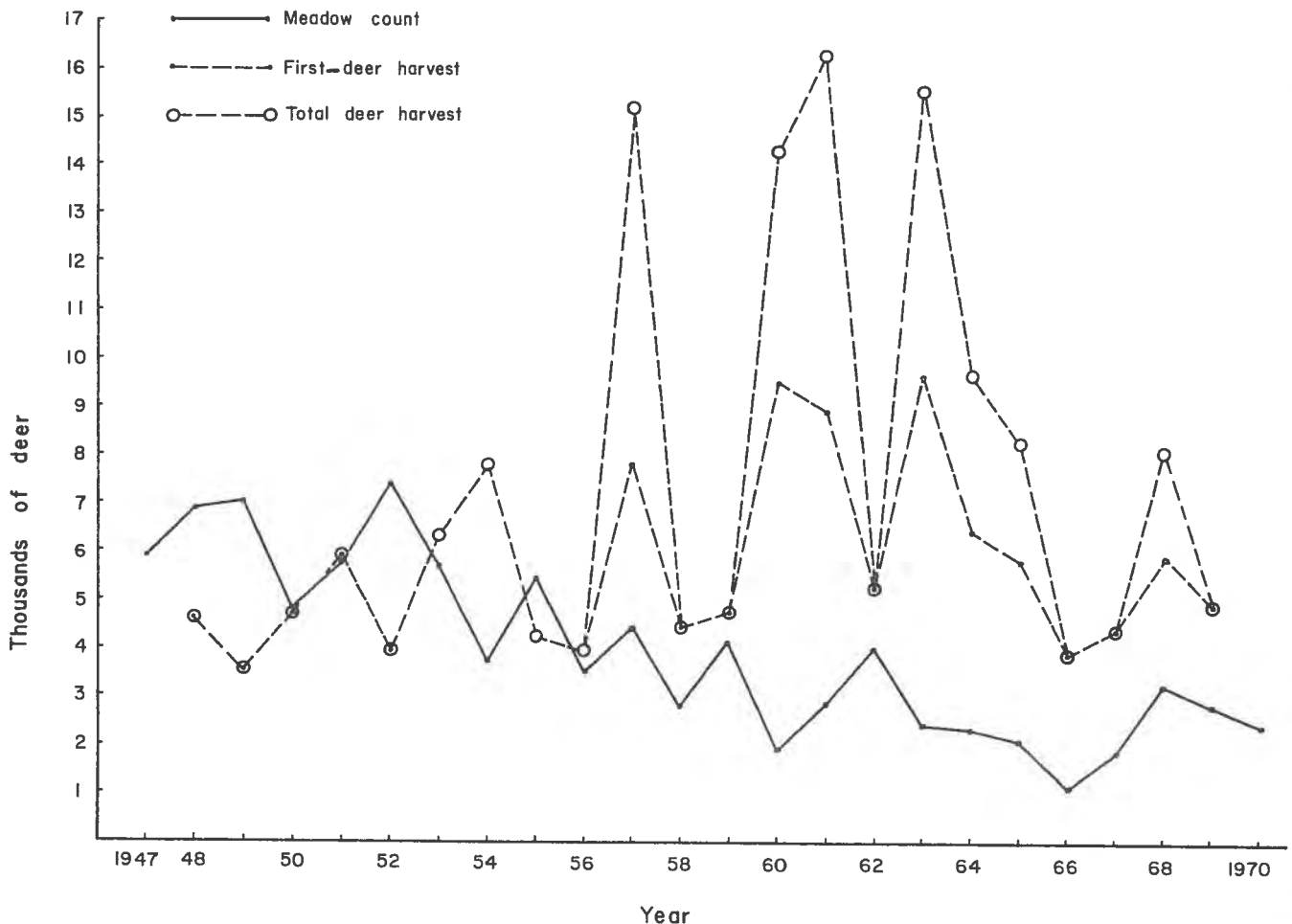


Fig. 3. Summary of Piceance Creek meadow deer counts, 1947-1970, and the first and total deer harvest in game management units 22, 23 and 24, 1948-1969. First-deer harvest figures are not available for 1953 through 1956. (Drawing by Richard M. Bartmann)

fawn:doe ratios differed significantly ($p < 0.01$) between years. The actual effect of varying productivity, as indicated by chi-square analyses, is unknown in terms of influence on hunter harvest. Limited comparisons of check station and report-card data in Colorado have indicated a bias in reporting of fawn kills, cards usually showing lower fawn proportions (Rogers 1965, Anderson 1966, Game and Fish Planning Services 1969 and Game Planning Services 1970). Thus, the assessment of productivity on the basis of report cards alone is hazardous, particularly in the light of hunter bias and low hunter report-card return percentages—about 34 percent, statewide average, during the past 20 years.

The second major factor affecting the meadow count-first deer kill relationship is the influence of hunting regulations on first-deer kill or harvest. This is evident (Fig. 4) where multiple deer bag limits in one or more of the three game management units are associated with higher first-deer harvests.

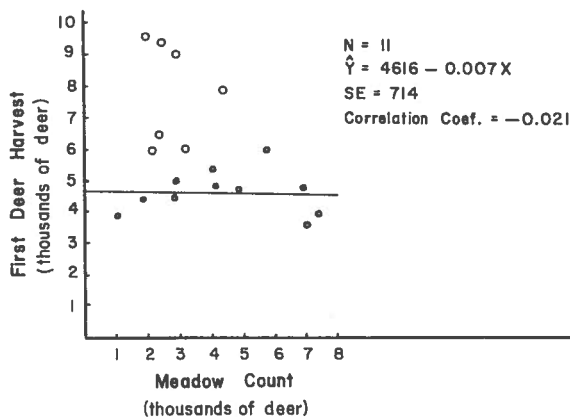


Fig. 4. Relationship of Piceance Creek meadow deer count and the first-deer harvest the following season in game management units 22, 23 and 24. Circles indicate years of multiple-deer bag limits in one or more units not included in the regression analysis. The correlation coefficient is not significant ($p > 0.05$). (Drawing by Richard M. Bartmann)

The two factors thus identified render improbable a valid quantitative analysis of the meadow count-first deer harvest relationship. The influence of varying annual productivity cannot be removed from the analyses, but years when liberal seasons were in effect in one or more units can be removed. A linear regression analysis of the remaining 11 years of data revealed no significant ($p > 0.05$) linear relationship, wherein the meadow count amounted to less than one percent of the total variation in the first deer harvest (Fig. 4). This indicated that the estimated first deer kill cannot be predicted from the meadow counts.

Total Deer Harvest-Meadow Count

In analyzing the effect of all deer harvest on the meadow count the following spring,

mortality between the two events must be assigned. Regrettably, quantitative data are unavailable concerning winter loss, probably the most important single consideration. However, past records reveal five winters when above "normal" losses could have, or did, occur in the Piceance area. These are depicted by circles in Figure 5. The scattered distribution of these points suggests no constancy in the effect of probably winter loss on the meadow count. A linear regression analysis substantiates the poor appearance of the total deer harvest-meadow count relationship indicated. Total estimated deer harvests and meadow counts were not significantly ($p > 0.05$) related. Thus, meadow counts cannot be predicted from total deer harvests.

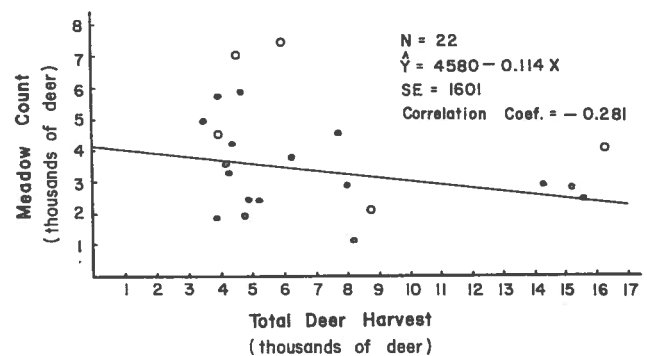


Fig. 5. Relationship of the total deer harvest in game management units 22, 23 and 24 and the Piceance Creek meadow deer count the following spring. Circles indicate years of above or potentially above "normal" winter loss. The correlation coefficient is not significant ($p > 0.05$). (Drawing by Richard M. Bartmann)

Presumably, if the meadow count reflected changes in deer densities, the larger harvests should have the most noticeable effect. For the four years when 14,000 or more deer were estimated to have been harvested in units 22, 23 and 24, there was subsequently a decrease in the meadow count one year, an increase for two of these years, and essentially no change for one year. However, these comparisons are valid only at or close to the same initial deer population levels, for which there is no information. Significantly, the increased count in 1961 followed the lowest meadow count up to the time, and the increased count the following year was preceded by the highest estimated total deer kill and a severe winter.

CONCLUSIONS AND RECOMMENDATIONS

The meadow-count data are difficult to evaluate due to lack of accurate deer population and environment data, but the hypothesis inferred from Figure 3 (increasing harvest, decreasing meadow count) does not appear valid. This viewpoint is based primarily on the total deer harvest-meadow count relationship. If the

meadow count is not sensitive to the larger estimated annual reduction in deer numbers that occurred, it probably is not indicative of annual deer population trends in the Piceance area.

On this basis, it is recommended that the meadow count, as presently conducted, be discontinued. An alternative would be to revise the current sample design to reduce errors and allow assigning of confidence limits to results for more valid year-to-year comparisons. Some suggestions to this end are: (1) randomize selection of sample areas; (2) delineate sample area boundaries precisely; (3) use a minimum of qualified observers; (4) standardize starting times, starting points, minimal weather conditions, etc.; and (5) repeat counts at intervals during the one- or two-week period when maximal numbers of deer are likely to be on the meadows, thus allowing for variations in weather and other phenomena affecting occurrence. However, these measures would not alleviate interpretation problems.

Meadow count results still need to be compared to reasonably precise population data in order to establish the kind and degree of relationship that probably does exist. A major consideration in this respect is that a large but unknown proportion of deer frequent areas not in close proximity to meadow lands and, therefore, have no chance of being included in the sample counts. The assumption that this population segment forms a constant proportion relative to the meadow deer would be difficult, if not impossible, to verify. Thus, given the same total population over a period of time, ingress or egress between the two habitats would result in a false "population trend" based on meadow counts.

In light of this problem, a second alternative and possibly a more feasible approach, would be to develop a sound sampling system for the

entire Piceance winter range. Enumeration would be most fruitful during winter when the deer are confined to winter range where they are more easily observed. An estimate of winter mortality, made in late spring, would also be needed since most of the loss probably occurs after winter counts. Pellet-group counts made in late spring, though less desirable in some respects, might also be considered.

ACKNOWLEDGMENTS

Appreciation is extended to Allen E. Anderson for proposing this evaluation and for critical review of the manuscript, and to Dr. David C. Bowden for statistical assistance.

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Assistant Wildlife Researcher
July, 1971

(Reprinted October 1979)

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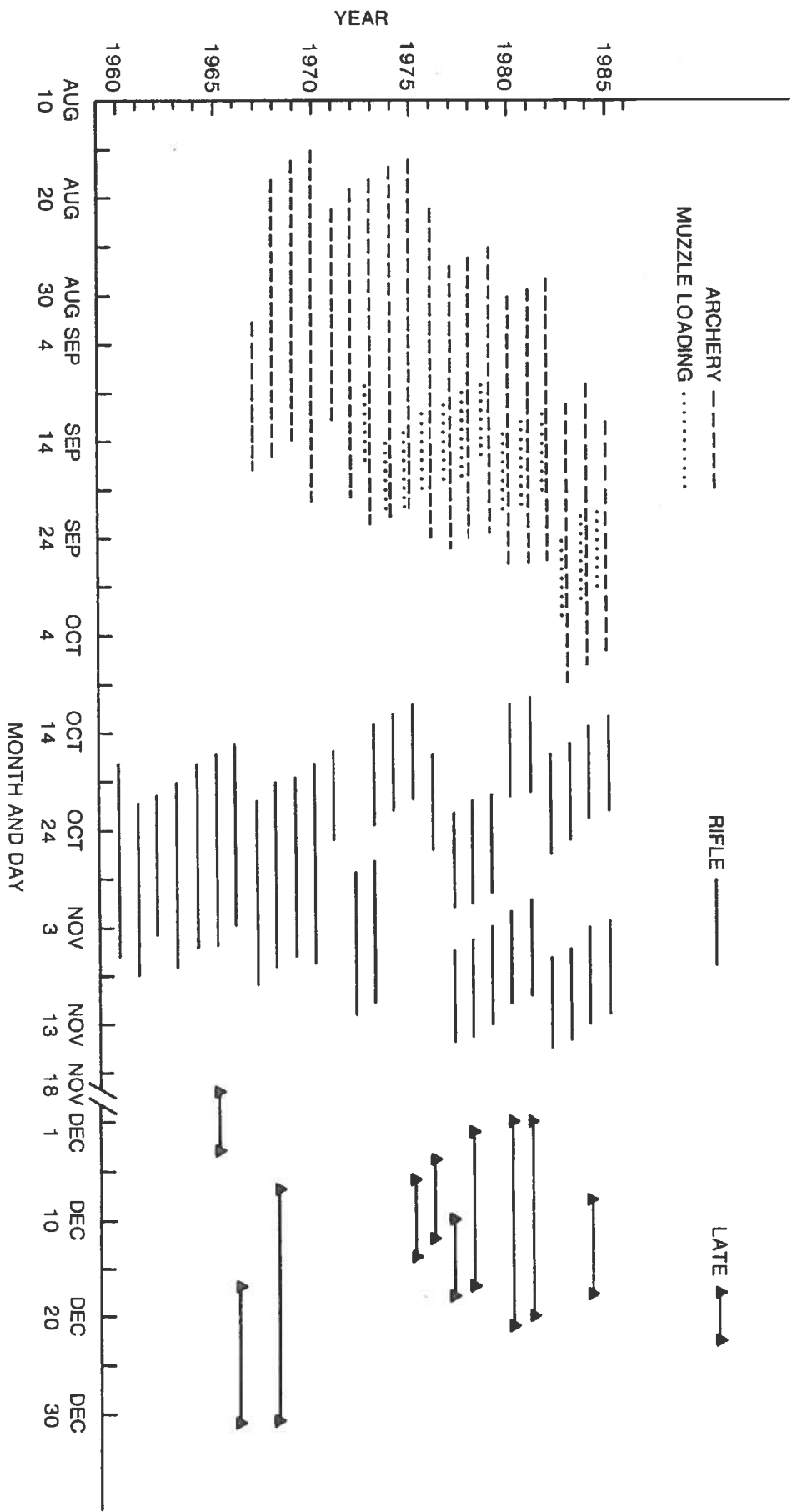


Fig. 9. Time periods of archery, muzzleloading, regular rifle, and late elk seasons for the White River population, 1960-85.

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February 3, 2012

Mr. Kent E. Walter
Ms. Heather Sauls
White River Field Office
Bureau of Land Management
220 East Market Street
Meeker, CO 81641

Re: Clarifications and Supplemental Data to
January 28, 2012 Comments on Draft Resource Management Plan

Dear Mr. Walter and Ms. Sauls:

I wish to clarify and supplement my comments submitted on January 28, 2012 with information in the following letter. I believe that this will improve and clarify my original comment letter.

I will present the information and tie it into the points made in the letter.

Point 1 Federal Authority.

10th Amendment In their opinion piece entitled “Why the Constitution’s Tenth Amendment Matters So Much” in Forbes Magazine on May 9th, 2011, Chip Mellor and Clark Neily point out:

Western Sloper
Perspective

“Government regulations are not entitled to a presumption of legitimacy simply because they result from a political process.”

This exactly ties in with the issues of “Regulation without Representation.”

I also wish to point out that the US Federal Government is yet to turn over all Federal Lands due the State of Colorado. Harmon pointed out that 9,700 acres are still due the State of Colorado (Harmon, 2011). It is the case that no state school

lands are to be found in the RMP Area. The land in the RMP was acquired from the Ute Tribe in the "Third Treaty - 1880" following statehood (See Jocknick, 1913 Appendix for a text of the treaty).

It is my belief that the failure of the State of Colorado to obtain School Lands in the resource rich Piceance Basin fits the pattern of Federal Imperialism and Colonialism.

Supplemental Recommendation – Point 1

Since the Federal Government has failed to perform, all federal agencies should voluntarily agree to pay the school districts the cost of educating the children of all Federal employees residing in the RMP area.

Points 2 & 3

Practical
Problems

A further examination of the RMP documents in Section IV pages 12, 13, and 14 are particularly illuminating.

While there are no dollar numbers for the values of oil and gas resources, values are placed for outdoor daily recreation.

It is apparent that thinking errors are present with the material presented. The errors are consistent with the historic economic analysis problems Discussed by Bastiat, 1850, "the seen and the unseen" and "The Fallacy of the Broken Window Pane" as follows:

Western
Sloper
&
Economics
Perspective

*"Things which
matter most must
never be at the
mercy of things
that matter least"*

Goethe

Frederic Bastiat - 1850

That Which is Seen and That Which is Unseen.

That which is
seen, and That
Which is
Unseen

In the department of economy, an act, a habit, an institution, a law, gives birth not only to an effect, but to a series of effects. Of these effects, the first only is immediate; it manifests itself simultaneously with its cause - it is seen. The others unfold in succession - they are not seen: it is well for us, if they are foreseen. Between a good and a bad economist this constitutes the whole difference - the one takes account of the visible effect; the other takes account both of the effects which are seen, and also of those which it is necessary to foresee. Now this difference is enormous, for it almost always happens that when the immediate consequence is favourable, the ultimate consequences are fatal, and the converse. Hence it follows that the bad economist pursues a small present good, which will be followed by a great evil to come, while the true economist pursues a great good to come, - at the risk of a small present evil.

In fact, it is the same in the science of health, arts, and in that of morals. It often happens, that the sweeter the first fruit of a habit is, the more bitter are the consequences. Take, for example, debauchery, idleness, prodigality. When, therefore, a man absorbed in the effect which is seen has not yet

learned to discern those which are not seen, he gives way to fatal habits, not only by inclination, but by calculation.

This explains the fatally grievous condition of mankind. Ignorance surrounds its cradle: then its actions are determined by their first consequences, the only ones which, in its first stage, it can see. It is only in the long run that it learns to take account of the others. It has to learn this lesson from two very different masters - experience and foresight. Experience teaches effectually, but brutally. It makes us acquainted with all the effects of an action, by causing us to feel them; and we cannot fail to finish by knowing that fire burns, if we have burned ourselves. For this rough teacher, I should like, if possible, to substitute a more gentle one. I mean Foresight. For this purpose I shall examine the consequences of certain economical phenomena, by placing in opposition to each other those which are seen, and those which are not seen.

I. THE BROKEN WINDOW

The Broken Window Fallacy

Have you ever witnessed the anger of the good shopkeeper, James B., when his careless son happened to break a square of glass? If you have been present at such a scene, you will most assuredly bear witness to the fact, that every one of the spectators, were there even thirty of them, by common consent apparently, offered the unfortunate owner this invariable consolation - "It is an ill wind that blows nobody good. Everybody must live, and what would become of the glaziers if panes of glass were never broken?"

Now, this form of condolence contains an entire theory, which it will be well to show up in this simple case, seeing that it is precisely the same as that which, unhappily, regulates the greater part of our economical institutions.

Suppose it cost six francs to repair the damage, and you say that the accident brings six francs to the glazier's trade - that it encourages that trade to the amount of six francs - I grant it; I have not a word to say against it; you reason justly. The glazier comes, performs his task, receives his six francs, rubs his hands, and, in his heart, blesses the careless child. All this is that which is seen.

But if, on the other hand, you come to the conclusion, as is too often the case, that it is a good thing to break windows, that it causes money to circulate, and that the encouragement of industry in general will be the result of it, you will oblige me to call out, "Stop there! your theory is confined to that which is seen; it takes no account of that which is not seen."

It is not seen that as our shopkeeper has spent six francs upon one thing, he cannot spend them upon another. It is not seen that if he had not had a window to replace, he would, perhaps, have replaced his old shoes, or added another book to his library. In short, he would have employed his six francs in some way, which this accident has prevented.

Let us take a view of industry in general, as affected by this circumstance. The

window being broken, the glazier's trade is encouraged to the amount of six francs; this is that which is seen. If the window had not been broken, the shoemaker's trade (or some other) would have been encouraged to the amount of six francs; this is that which is not seen.

And if that which is not seen is taken into consideration, because it is a negative fact, as well as that which is seen, because it is a positive fact, it will be understood that neither industry in general, nor the sum total of national labour, is affected, whether windows are broken or not.

Now let us consider James B. himself. In the former supposition, that of the window being broken, he spends six francs, and has neither more nor less than he had before, the enjoyment of a window.

In the second, where we suppose the window not to have been broken, he would have spent six francs on shoes, and would have had at the same time the enjoyment of a pair of shoes and of a window.

Now, as James B. forms a part of society, we must come to the conclusion, that, taking it altogether, and making an estimate of its enjoyments and its labours, it has lost the value of the broken window.

When we arrive at this unexpected conclusion: "Society loses the value of things which are uselessly destroyed;" and we must assent to a maxim which will make the hair of protectionists stand on end - To break, to spoil, to waste, is not to encourage national labour; or, more briefly, "destruction is not profit."

What will you say, Monsieur Industriel -- what will you say, disciples of good M. F. Chamans, who has calculated with so much precision how much trade would gain by the burning of Paris, from the number of houses it would be necessary to rebuild?

I am sorry to disturb these ingenious calculations, as far as their spirit has been introduced into our legislation; but I beg him to begin them again, by taking into the account that which is not seen, and placing it alongside of that which is seen. The reader must take care to remember that there are not two persons only, but three concerned in the little scene which I have submitted to his attention. One of them, James B., represents the consumer, reduced, by an act of destruction, to one enjoyment instead of two. Another under the title of the glazier, shows us the producer, whose trade is encouraged by the accident. The third is the shoemaker (or some other tradesman), whose labour suffers proportionably by the same cause. It is this third person who is always kept in the shade, and who, personating that which is not seen, is a necessary element of the problem. It is he who shows us how absurd it is to think we see a profit in an act of destruction. It is he who will soon teach us that it is not less absurd to see a profit in a restriction, which is, after all, nothing else than a partial destruction. Therefore, if you will only go to the root of all the arguments which are adduced in its favour, all you will find will be the paraphrase of this vulgar saying - What would become of the glaziers, if nobody ever broke windows?

In particular the "Too Wild to Drill" is exactly the same situation where there is no consideration given to the value of the oil and gas. The plan though can tell how

valuable the visits are though in real \$\$.

There is a further issue and that is one of what amounts to money laundering where the political elites dictate land uses that are favored by their loyal environmental constituents, who in turn support the politicians. The most egregious example of this in my opinion was the “Roadless Areas” grab by President Bill Clinton on his way out the door. See the attachment “They can fool the tourists, but we live here”

The “Lands with Wilderness Characteristics” looks to be the same thing. Then they can also get in on the Environmental litigation gravy train (Budd-Falen, 2009). I did also cover this in part previously.

Exhibit II-9 in Section II Page 12 of the Social and Economic Analysis Technical Report sheds some light on the dirty secret. Recreation and Tourism jobs are low wage. Note the relatively low weekly wage of “Accommodation and Food Services workers.

This table looks to be incomplete and I would ask why there are no figures for oil and gas workers. This looks to be an important piece of missing data.

It is my belief that Tourism and Recreation must be looked at as an “add-on”. There is no way for an economy in the RMP area to be based on them. I find it mildly amusing that Carbondale, Colorado, one of the areas where The Wilderness Society has offices or people was pointed out in the EIS for Oil Shale OSTs PEIS Figure 3.12-1 to have a minority population greater than 50%.

The “beautiful people” in “the ruling class” as described by Codevilla, 2010, in the Roaring Fork Valley where some of the world’s richest people own property, still like to have low paid illegal aliens of Hispanic and other origins doing the work.

Supplemental Recommendation – Points 2 & 3

Wage rates for Oil and Gas Workers should be collected and presented. Ideally, this would include a differentiation of several different categories in the oil and gas industry.

The magical thinking that sound decisions can be made while opportunity costs are not considered must stop. An honest weighing of relative benefits and costs must be employed. The BLM should develop training classes in economics that present The Fallacy of the Broken Window and other concepts developed by Hayek and Mises.

The need for audited financial statements is further supported. In particular, was The Wilderness Society or any Wilderness Society members or any environmental organization paid anything for the characterization of the wilderness lands or paid to prepare the RMP?

Point 10 Mule Deer – Expanded to Mule Deer and Elk

The recent questioning of the Mule Deer numbers, as I also did, in an article by Webb, 2013, points to what amounts to a falsification of the data in the RMP. Sound science requires that when a theory is falsified in any aspect, the model and theory is to be considered invalid.

I believe that failure to use published data is a substantial reason for the errors. I can not help but wonder if this was an intentional oversight to promote conflict. Does an intentional error confirm actions in bad faith by some of the RMP preparers?

Western Sloper
Perspective

These errors support my previous recommendation to have a Resource Assessment and Characterization done by the BLM. It should also apply to Elk.

When there actually was a migratory deer herd in the RMP area, as evidenced by Bartmann, 1971 and Attached to my prior letter, some of the scenes then, looked like the following images from an actual migratory deer herd that still exists. I took these along the Utah – Idaho border a couple of years ago. This is what the White River herd looked like when I was a child living in the RMP area.



**Utah / Idaho
2010**



Migratory Deer – Utah / Idaho 2010

1947 Meadow Count in Piceance Creek

9,878 Animals – April 20 or 21
(higher of the two days counted)

Map From Bartmann, 1971

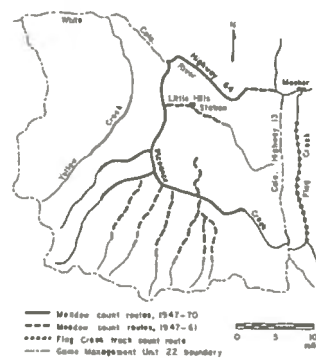


Fig. 2. Approximate locations of Piceance Creek meadow deer count routes and the Flag Creek track count route, Rio Blanco County, Colorado (Drawing by Richard M. Bartmann)

A proper Resource Assessment and Characterization would also reconcile the historic published data for Mule Deer and Elk.

I made reference to Elk being an invasive species. I want to present some of the back-up data to confirm that this conclusion is beyond question. I have oral history data collected from lifelong residents that confirm that there were no Elk west of the Grand Hogback until 1949. This is consistent with attached maps from Carhart, 1940 that do not show any Elk winter range west of the Grand Hogback.

The oral histories and my own recollection indicate that some time in the 1970's was when the Elk herd expanded to cover the Piceance Basin.

I believe that the DOW was not content to manage the Real Migratory Mule Deer herd that existed in the area and ideas were circulated to have different game in the area. A circa 1939 map in the Denver Public Library made by The Colorado State Game and Fish Department is included in the Attachments to this letter. I believe that this is a "Fantasy Map" and a product of magical thinking.

The crop of the title area says "Habitat of Game Shown by Red Names on Map" The copy I obtained was in black and white, but I can attest to the fact that the word Elk ~ east of Willow Creek was in Red and the word Mountain Sheep in the Jordan Gulch area was in Red. Also the White River State Game Refuge was in red as I recall, but it clearly was some kind of wish that never came to pass.

Local knowledge confirms that there were no Mountain Sheep in Jordan Gulch in 1939 nor were there Elk in the Piceance Basin – the map is just what the DOW must have wanted, along with a big hunk of land.

It must be understood that the DOW and the DOW personnel have personal financial interests at stake because their activities are largely funded by hunting licenses. They are not some disinterested third party. They are State Government Entrepreneurs. (I thought about adding that they are simply law enforcement personnel, not scientists, that make a living selling hunting licenses, but that may be a tad harsh.)

Supplemental Recommendations – Point 10

Best Practices must be required of the DOW. Since DOW is operating on BLM property, the BLM must require the DOW to voluntarily agree to publish all data and reports derived from their operations. Ideally, this should go into peer reviewed scientific journals, but at a minimum there should be some web based data site where the study data and reports can be accessed by the public.

"To tell the truth is a petty bourgeois habit, whereas for us to lie is justified by our objectives"

V.I. Lenin

Perhaps, some consideration should be given to making the DOW data collection be a permitted activity so Best Practices can be required.

The BLM then should use all the data in their management practices. Access to

accurate baseline data is critical to sound scientific practice.

The Elk hunting histories of the Piceance Basin should be investigated to validate that the Elk are an Invasive Species.

I question, if in fact at this point, the BLM is not legally obligated to exterminate the Elk from the Piceance Basin. Unquestionably they must be treated as an invasive species.

Further, the impact of Elk on the Mule Deer populations must be studied and documented in published work. I believe that the competition from Elk is a major factor in the Mule Deer herd health. I expect that it will be learned that this impact from Elk is more significant than anything that oil and gas development will do. This study should also document the impact of predators – mostly Coyotes.

As for the Elk, since they are an invasive species, there should be no timing restrictions on oil and gas development for any reason to protect the Elk population.

What ever the BLM decides to do, I believe it is critical to collect your own data and do your own thinking. It is mandatory to do that to be able to validate any DOW data or interpretations.

Conclusion

In the past, I believed that my intimate knowledge of the area and my professional training would go some way to providing standing so that my comments would be actually considered and addressed and have some influence. It never happened, but I could always have hope. In his book “The Ruling Class”, Angelo Codevilla really did straighten me out to understand that these things would be a negative. So this Country Class person from the hinterlands will be watching. The burden is on you to do the right thing – it is time for you to shine.

“There is nothing more terrible than ignorance in action.”

Goethe

When I recently talked with my 86 year old father about his years dealing with the government for timber sales, etc., he said that he always tried to tell the people to their face when he had a problem with what they were doing. They didn’t hear it first from someone else and learn that they were being talked poorly of to others. I have stepped up here to tell you what I see and think, I appreciate your attention and consideration.

Respectfully submitted,

/s/ Larry R. Moyer

Larry R. Moyer

Attachments

They Can Fool The Tourists, But We Live Here
Carhart, 1940 –
 Winter Elk Range – Meeker District – White River Drainage
 Winter Elk Range – Meeker District – Colorado River Drainage
Colorado State Game and Fish Commission, 1939
 Entire Map
 Legend Area
 Northwest Part

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THEY CAN FOOL THE TOURISTS, BUT WE LIVE HERE



Rev. Wright Mar-08

“Bill did us just like he did Monica Lewinski, He was Ridin Dirty”

Was the good Rev. Wright talking about Pres. Clinton being at the Grand Canyon when he locked up the Kaiparowits Basin, or was it when he made the USFS Roadless Rules?

Who in Washington D.C. cares about those Southern Utah people, the elite think they are just a bunch of pligs anyway?



Luke Frazza/AFP/Getty Images

President Bill Clinton signs an order to create Grand Staircase-Escalante monument in Utah while sitting on the edge of the Grand Canyon in Arizona, Sept. 18, 1996, while Vice President Al Gore watches. The area holds one of the largest known U.S. coal reserves, which is now off limits for mining

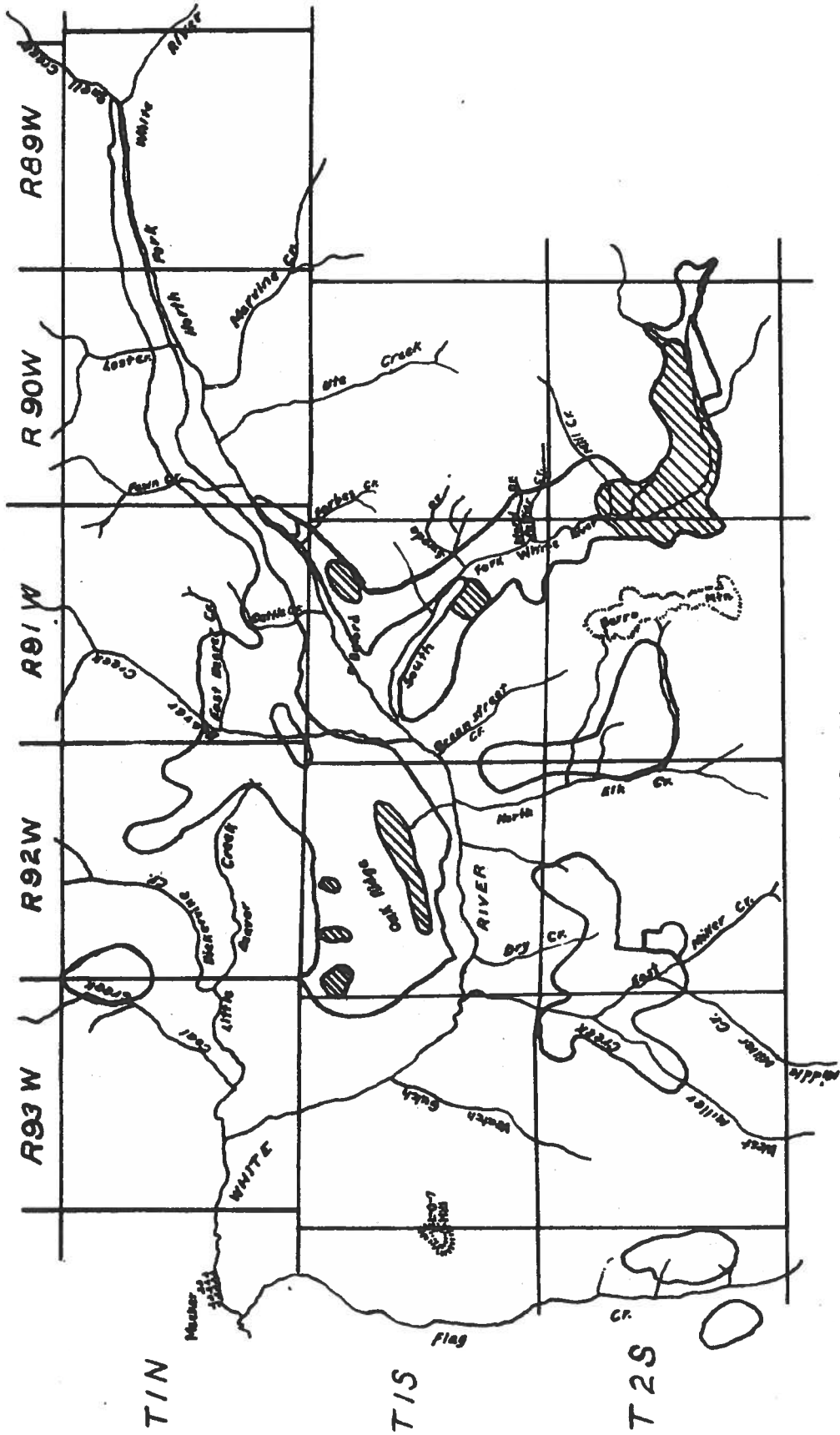
From NPR

<http://www.npr.org/templates/story/story.php?storyId=90631198>

Where is the mitigation and restitution? The roadless issue was lost nearly 40 years ago when the Environmental Industry was allowed to define the terms. When do they pay?

WINTER ELK RANGE

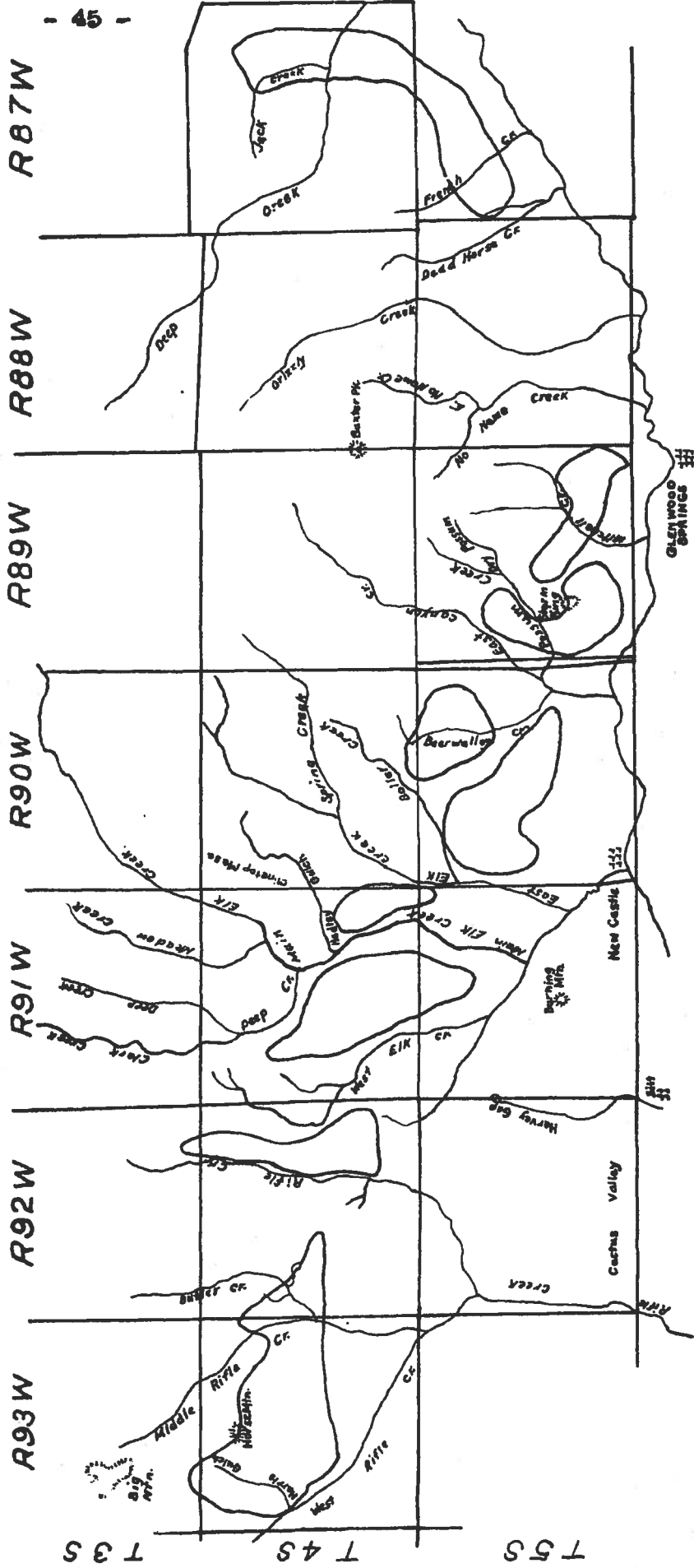
Meeker District—White River Drainage



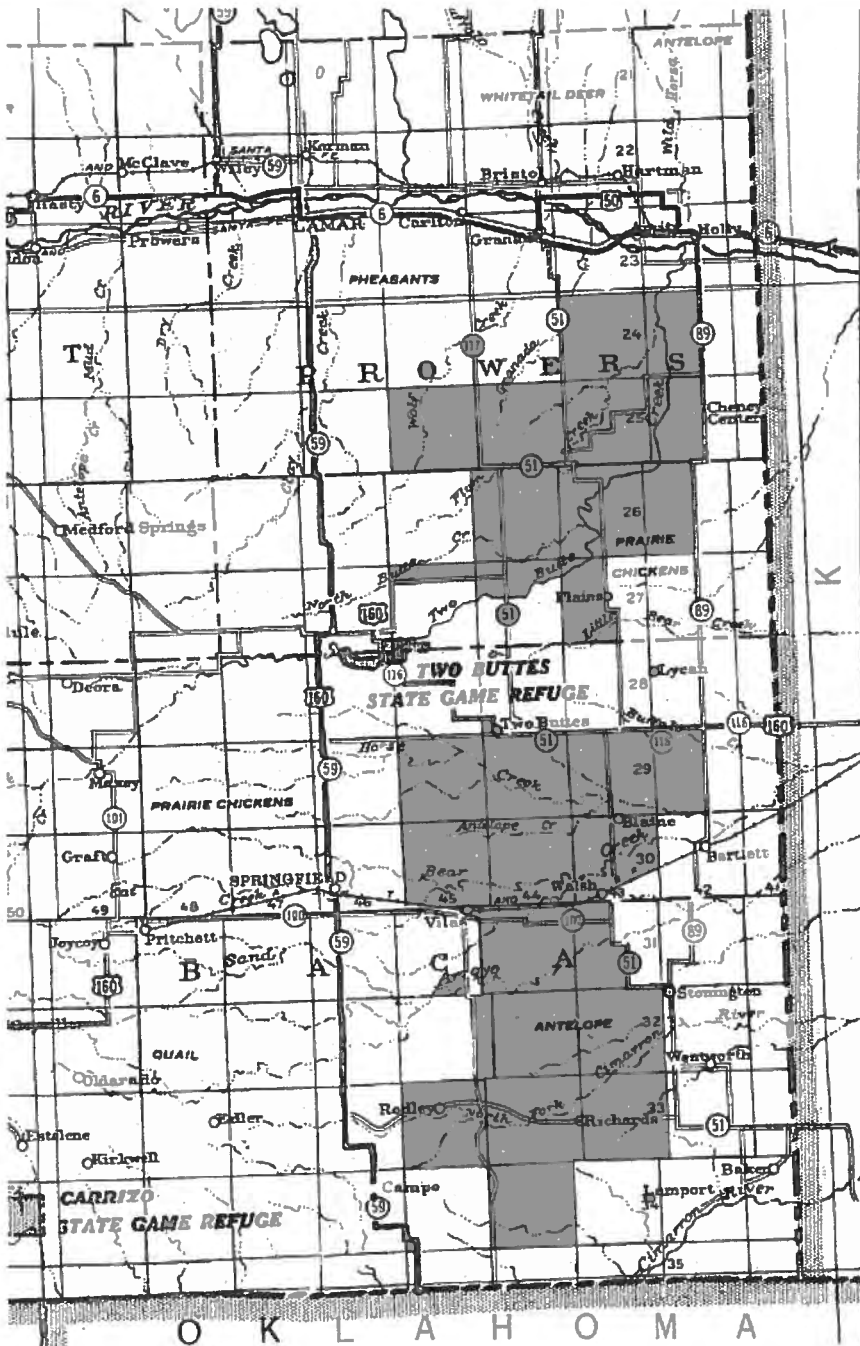
LEGEND
Boundary Winter Range ———
Concentration Area [Hatched Box]

WINTER ELK RANGE

Meeker District—Colorado River Drainage



LEGEND
Boundary Winter Range —



Names and Areas State Game Refuges

	Acres
Apache	9,920
Bear Creek, Tower Mtn.	11,040
Buffalo Peaks	192,040
Cameron Pass	63,200
Carrizo	7,680
Cochetopa	302,560
Colorado	546,800
Colorado Antelope	69,120
Crystal Creek	17,440
Denver Mountain Parks	470,400
Douglas Mountain	357,120
Gunnison	288,520
Holy Cross	39,200
Julesburg	12,000
Newlan Creek	48,800
North Park	18,560
Ourray	53,120
Pikes Peak	281,180
Poncha Pass	62,520
Royal Gorge	65,600
Smith Hollow	5,200
Snowmass	96,640
Spanish Peaks	79,860
Two Buttes	3,500
Waugh Mountain	36,480
White River	412,160
Williams Fork	82,080
Bljuu Valley	21,760
Beuck	40,960
TOTAL	3,682,120

Areas Shaded in Red Indicate State Game Refuges.
Red Stars Indicate Location of Fish Hatcheries.
Habitat of Game Shown by Red Names on Map.

ISSUED BY

THE COLORADO STATE GAME AND FISH DEPARTMENT

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COLO. 1939

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Colorado State Game and
Department.

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MAP

MAP OF COLORADO--I.

