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June 20, 2013

Ms. Katie Stevens, Manager
Bureau of Land Management
Grand Junction Field Office
2815 H Road
Grand Junction, Colorado 81506

RE: Draft Resource Management Plan

Dear Ms. Stevens:

Thank you for the opportunity to review and comment on the Draft Resource Management Plan and Environmental Impact Statement (the DRMP for the Grand Junction Field Office, Colorado (GJFO)). We have appreciated our role as a cooperating agency in this process. Our goal is to help the BLM ensure the public lands in Mesa County and the region in general are managed in the most appropriate and beneficial manner. Our comments provided herein are submitted in a spirit of cooperation, coordination and partnership.

Mesa County is the economic regional center for western Colorado and Eastern Utah. Multiple uses of BLM lands and resources in the GJFO area and surrounding field offices directly and indirectly impact the Mesa County economy, including agriculture, forestry, energy development, recreation, tourism, etc. The alternatives in the DRMP cover a wide range of potential uses and associated impacts. We have thoroughly reviewed the DRMP and received extensive public input on the document. In general, we do not support the preferred alternative (B), but do generally support many aspects of alternatives A & D.

Please consider the following comments in drafting the Final Resource Management Plan that will guide multiple use of the Grand Junction Field Office for next twenty years or more. Enclosed are specific comments based on public input and our consultant's recommendations (Pan Pacific Services). This cover letter summarizes our general concerns with the DRMP and outlines the comments from our consultant. We appreciate your staff's response to a few specific questions posed by our staff on the DRMP. Those responses are referenced in this letter as "May 8 Response."

Air Quality

Activity of all sorts within the Grand Valley Airshed is of particular importance (the area under 6,000 feet elevation), as it is susceptible to winter-time inversions, high PM2.5 values, and wind blown dust storms. We support the on-going efforts to remain an "attainment" area in terms of air quality standards in the Clean Air Act and encourage the BLM to participate in

these efforts and programs. Please see the comments from the Mesa County Air Quality Planning Committee.

The RMP must explicitly justify the proposed management for air quality clearly in the RMP in order to demonstrate the BLM does not exceed its authority to control air emissions and air quality contrary to the Clean Air Act which is administered by the EPA and the State of Colorado. Although we appreciate the May 8 Response addressing this issue we remain skeptical that the proposed stipulations for oil and gas development may unduly hinder and discourage positive economic activity in the planning area and exceed BLM's authority.

Backcountry Byways

We cannot support the designation of any new BLM Backcountry Byways which results in an expectation of increased maintenance or improvements by Mesa County on these remote, narrow and rugged roads (Lands End; John Brown Canyon; Niche to Blue Mesa -Uranium Road). We appreciate the fact that Backcountry Byways have been reduced in alternative B per Mesa County comments as a cooperating agency.

Socio-Economics

Accurate portrayal and analysis of the social and economic impacts of multiple use of BLM lands is lacking in the DRMP. Parts of the DRMP rely on old, outdated, or non-applicable and inconsistent socio-economic data and analyses. Our primary concern is with the methodology, and cited and non-cited studies resulting in underestimated impacts of multiple uses of the BLM to the local and regional economy. We are encouraged from the May 8 Response stating:

"(B)LM is working closely with Colorado Mesa University on the numbers used in the economic impact analysis numbers and the comparison of relative data from neighboring offices and studies. It is likely that information gained through public and cooperating agency comments as well as further information gathering in response to comments will result in BLM and CMU updating the spending profiles."

As a cooperating agency we request BLM to keep us apprised of progress on updates to the crucial socio-economic analyses in the RMP.

Weed Management

Mesa County and the BLM have a history of working as partners in managing weeds. The Final Plan needs to ensure management in a manner that will decrease the likelihood of weed proliferation on BLM and private lands.

Grazing Allotments

Agriculture is a very important component of Mesa County's economy, culture and lifestyle. The use of BLM lands is key to the local ranching industry. Proposed grazing allotments to be closed to livestock grazing are of concern. We understand the preferred alternative would close 24 areas presently "unallotted" and designated as "Custodial." The status of all allotments needs to be determined on a case-by-case basis in concert with the permittees at the implementation stage of planning. Alternatives A and appear to be most consistent with this approach. ***We endorse the enclosed comments from the Mesa County Cattlemen's Association.***

Lands with Wilderness Character outside of Wilderness Study Areas (WSA)

We do not support the de facto creation of additional wilderness areas by managing any areas outside of WSAs to protect wilderness characteristics. We assert such management is outside BLM jurisdiction and legislatively prohibited by Congress. Regardless, we agree with the following in the DRMP:

"Management under Alternative A has led to current conditions that include wilderness characteristics existing in 12 areas within the planning area. Wilderness characteristics would likely persist in many of these areas under Alternative A." (pp 4-258-259). Additionally, Alternative D includes other management measures "providing indirect protection to wilderness characteristics. (p 4-263).

Game Retrieval

Mesa County is very supportive of hunting on our public lands. Although the "preferred alternative does not allow motorized or mechanized travel off routes for game retrieval except for with hand-held wheeled game carts" (May 8 Response), we encourage the BLM to consider carefully the feasibility of allowing game retrieval off of designated trails in areas where the landscape can handle such use. Per the May 8 Response we encourage BLM to coordinate with CPW and other interested parties and appreciate clarification that the Grand Mesa Travel Plan (USFS) also "does NOT contain special allowances for down game retrieval."

Oil and Gas (Fluid Leasable Minerals)

Preserving the ability for the oil and gas industry to operate, extract and explore is of great importance to the region due to positive economic impacts. In general we do not support closing areas to leasing. The DRMA does not adequately discuss potential new technologies which may alter the determination of high to low occurrence of oil and gas resources and the ability to discover and extract the resources. The amount of acreage where no surface occupancy (NSO) stipulations would be applied to future leased lands in the DRMP needs to be reduced significantly to meet FLPMA guidelines where the least restrictive measures available should be applied to protect other resources such as special status species, WSAs, ACECs, sensitive soils, riparian areas and recreation sites before applying NSO stipulations as a last resort.

Although areas with existing leases would not be subject to the stipulations in the DRMP, we are not supportive of applying new conditions of approval (COA) based on the new RMP. The unpredictability of changing and unknown COAs will deter the industry from developing the resources to their fullest extent while using best management practices and result in a reduction of economic activity locally and regionally.

See enclosed detailed comments.

Wild/Scenic Rivers

Mesa County proudly participated in the Lower Colorado River Wild And Scenic Stakeholder Collaborative, and we are pleased to see the preferred alternative recognizes input from that group. We strongly support utilizing available and recommended management tools to protect the free-flowing nature and Outstanding Recreational Values for the stretches of waterways identified as eligible for designation. We do not support any recommendation of these waterways as suitable for wild or scenic designation.

Mt. Garfield Area of Critical Environmental Concern (ACEC)

We appreciate the DRMP's recognition of Mt. Garfield as an important visual icon in the Grand Valley by proposing the Mt. Garfield ACEC and applying Visual Resource Management (VRM) Class I designation in the preferred alternative. The entire 1-70 frontage from Mt. Garfield to the mouth of DeBeque Canyon including the Mt. Lincoln area as suggested in Alternative C is also worthy of VRM Class I designation.

Travel Management Plan

We appreciate that the DRMP recognizes the roads defined on our maps that we shared with the BLM as "County Roads" and "Vested County Interest" roads. Our comments include an updated list and map of Vested Interest Routes (VIR) and Vested Interest Areas that should remain open to public use based on extensive public input and review. We look forward to working with the BLM as a cooperating agency to finalize these routes for the Final RMP.

Vested Interest Routes

We have identified additional Vested Interest Routes (VIR). Members of the public have identified the high value recreation route opportunities. The social and economic values of the routes were considered in the selection process. Some routes were selected because of they are critical for public safety. Many of the proposed routes connect to county roads and provide loop opportunities. Mesa County is interested in partnering with the tourist industry, the BLM and user groups to promote these routes as destinations by means such as visitor information guides and signage.

Mesa County Vested Interest Areas

The vested interest areas as shown on the VIR map have high value because of the high concentration of use and potential for tourism.

Grand Valley Open Area:

This large open space is the location of choice for over 250,000 visitors a year. It is by far the most popular single recreation destination in the Field Office and the County.

Bangs Canyon SRMA:

Bangs Canyon is a well defined multiple use recreation area. Trail based motorized and non-motorized trails appeal to a different segment of the public than the Grand Valley Open Area. The routes in general are moderate difficulty and an infrastructure has been constructed.

Castle Rock (DeBeque):

Castle Rock is a more remote setting and the routes are all single track. The level of difficulty of most routes attracts the most skilled and technical riders of motorcycles and bicycles.

Gateway Mesas:

Gateway is very remote. Access is limited to two routes. The existing old mining roads are a unique experience of orienteering and challenging terrain. Over 600 miles of routes with historical sites and spectacular views provide a great experience. The Mesas have easy to very challenging routes suitable to motorized and non motorized recreation. The County sees this area as a growth opportunity for tourism.

Summary of "Detailed Comments" (full comments with suggested resolutions enclosed)

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.

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),

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places buffers around existing WSAs, and expands existing WSAs. The DRMP does not have the proper analysis and statutory authorization to 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 page 3-143 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.

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; describe 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 un-cited and is in serious conflict with very reliable and well respected sources, including the Western Governors Association.

Economics

The economic numbers in the DRMP 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.

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.

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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 routes is any reference to the recreation effects that are enjoyed the public.

Thank you again, for the opportunity to provide comments. We look forward to a Final Resource Management Plan that will serve the multiple use needs of the public for the next twenty years. Please let us know if you have any questions.

Sincerely,
Board of County Commissioners


Steve Acquafresca, Chair


Rose Pugliese, Commissioner


John Justman, Commissioner

Enclosures:

Mesa County Cattlemen's Association Comments
Oil And Gas (Fluid Leasable Minerals) Comments
Detailed Comments
Public Comments Submitted to Mesa County
Board of County Commissioner's
OP/ED Article "Protecting Access To Roads On Public Lands"
Vested Interest Routes/Areas Map and List
Public Land Access Petition

cc: Tom Fisher
Pete Baier
Keith Fife
Helen Hankins, BLM Colorado State Director
Congressional Delegation