



Curecanti National Recreation Area Motorized Vehicle Access Plan/EA

Public Scoping Comment Analysis Report

August 2008

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INTRODUCTION AND GUIDE

INTRODUCTION

On June 5, 2008 Curecanti National Recreation Area (CURE) released the Public Scoping Brochure for the Motorized Vehicle Access Management Plan/EA for public review and comment. The brochure was available locally at the park, on the park website (http://www.nps.gov/cure/parknews/orv_ea.htm), and on the National Park Service planning website (<http://parkplanning.nps.gov/cure>). In addition, 500 brochures were mailed to local agencies, government offices, organizations, local libraries, landowners, and members of the public. The public was invited to submit comments on the scope of the planning process and potential alternative elements through July 11, 2008. During the scoping period, two public scoping open houses were held. The first was at the Holiday Inn Express in Montrose, Colorado, on June 24th. The second open house was held at the Fred R. Field Western Heritage Center (Gunnison Fairgrounds) in Gunnison, Colorado on June 25th. Park staff and other National Park Service (NPS) specialists were on hand to answer questions and provide additional information to workshop participants. During the scoping period, nine pieces of correspondence were entered into the Planning, Environment, and Public Comment (PEPC) system, either from direct entry by the commenter, or uploading of hard copy letters, emails, and flip chart comments received at the meetings.

THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the Interdisciplinary Team (IDT). Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to *National Environmental Policy Act* (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding of public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Outputs from the database include the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information for the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a comment was received.

DEFINITION OF TERMS

Primary terms used in the document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

Code: A grouping centered on a common subject. The codes were developed during the scoping process and were used to track major subjects.

Concern: Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not. For example, "Preliminary Alternative Element: Designate Routes and Areas " was broken down into three concern statements, while "Impacts from Snowmobile Use did not need further refinement and only has one concern statement. In cases where no comments were received on an issue, the issue was not identified or discussed in this report.

Quotes: Representative quotes that have been taken directly from the text of the public's comments and further clarify the concern statements.

All scoping comments were considered to be important as useful guidance and public input to the scoping process, but only substantive comments were analyzed in the Public Scoping Comment Summary Report. At this phase of the project, all comments are treated as being substantive.

GUIDE TO THIS DOCUMENT

This report is organized as follows:

Content Analysis Report- This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Scoping Comment Summary- This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and further clarify the concern statements.

Correspondence Index of Organizations- This provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC (and in this order): businesses; churches and religious groups; civic groups; conservation/preservation groups;

federal government; NPS employees; non-governmental groups; recreational groups; state government; town or city government; tribal government; unaffiliated individuals; university/professional society. Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments.

Correspondence Index of Individual Commenters- This provides a listing of all of the individuals who submitted comments during the public scoping period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically.

Index By Organization Type- This list identifies all of the codes that were assigned to each individual piece of correspondence and is arranged by organization type. Individual commenters are also included in this report and are identified as Unaffiliated Individuals.

Index by Code- This lists which commenters or authors (identified by PEPC organization type) commented on which topics, as identified by the codes used in this analysis. The report is organized by code, and under each code is a list of the authors who submitted comments that fell under that code, and their correspondence numbers. Those correspondences identified as N/A represent unaffiliated individuals.

CONTENT ANALYSIS REPORT

Code	Description	Number of Comments
AL4000	Alternatives: New Alternatives Or Elements	4
AL4001	Questions About Alternative Element Terminology	4
AL5002	Preliminary Alternative Element: Separation of Visitor Uses	3
AL5003	Preliminary Alternative Element: Educational/Informational Materials	3
AL5004	Preliminary Alternative Element: Designate Routes and Areas to Protect Resources	15
AL5005	Preliminary Alternative Element: Temporary/Seasonal Closures	2
AL5006	Preliminary Alternative Element: Snowmobile Access	5
AL5007	Preliminary Alternative Element: Restrict ORV Play Areas	1
AL5008	Preliminary Alternative Element: Parking Areas	2
AL5009	Preliminary Alternative Element: Mobility-impaired Access	1
AL5010	Preliminary Alternative Element: Close All or Part of Park Unit or Provide Buffers for Resource Protection	0
CC1000	Consultation and Coordination: General Comments	7
CI1000	Cumulative Impacts: Reasonably Foreseeable Actions	2
GA1001	Impacts From Snowmobile Use	2
IC100	ISSUES - Cultural resource issues	1
IN100	ISSUES - Natural resource issues	3
IV100	ISSUES - Visitor use or experience issues	3
PN3000	Purpose And Need: Scope Of The Analysis	2
PN8000	Purpose And Need: Objectives In Taking Action	2

Correspondence Distribution by Correspondence Type

Type	Number of Correspondences
Web Form	4
Public Meeting Flipchart Comments	2
Park Form	1
Letter	1
E-mail	1
Total	9

Correspondence Signature Count by Organization Type

Organization Type	Number of Correspondences
Federal Government	2
Unaffiliated Individual	7
Total	9

Correspondence Distribution by State

State	Percentage	Number of Correspondences
CO	88.89%	8
MT	11.11%	1
Total		9

Correspondence Distribution by Country

Country	Percentage	Number of Correspondences
Unspecified	55.56%	5
United States of America	44.44%	4
Total	100%	9

PUBLIC SCOPING COMMENT SUMMARY

AL4000 - ALTERNATIVES: NEW ALTERNATIVES OR ELEMENTS

Concern ID: 17957

CONCERN STATEMENT: Commenters suggested that the National Park Service control and limit access to out-of-bounds camping areas and eliminate extraneous points of access.

Representative Quote(s): **Corr. ID:** 7 **Organization:** *Not Specified*
Comment ID: 84346 **Organization Type:** Unaffiliated Individual
Representative Quote: Control access to areas where out of bounds camping occurs

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84339 **Organization Type:** Unaffiliated Individual
Representative Quote: Evaluate potential to eliminate extraneous access points (e.g. those close together near Lake City Bridge on 149)

Concern ID: 17958

CONCERN STATEMENT: One commenter suggested that administrative uses at the park should be maintained and focused.

Representative Quote(s): **Corr. ID:** 7 **Organization:** *Not Specified*
Comment ID: 84334 **Organization Type:** Unaffiliated Individual
Representative Quote: Maintain/focus administrative uses

Concern ID: 17959

CONCERN STATEMENT: One commenter stated that recreational driving should not be allowed below the high water mark and that the area should be accessed for fishing or boat launching only.

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 83563 **Organization Type:** Unaffiliated Individual
Representative Quote: If access is allowed to the area below the high water mark for non-winter motorized vehicles, such access should only be permitted via a limited number of access points, and only after ensuring that use of the area will only be for the purposes of fishing and/or launching a boat. No recreational driving should be allowed in this area. Any access points that are not designated through this process should be rehabilitated so that future use does not continue and damage from past use does not continue to degrade the environment of the park.

AL4001 - QUESTIONS ABOUT ALTERNATIVE ELEMENT TERMINOLOGY

Concern ID: 17960

CONCERN STATEMENT: Commenters had questions about some of the terminology used in the Preliminary Alternative Elements, including the meaning of “administrative use,” “play areas,” the self-certification permit system, and the closing of all or part of the park.

Representative Quote(s): **Corr. ID:** 3 **Organization:** Western Area Power Administration
Comment ID: 83558 **Organization Type:** Federal Government
Representative Quote: Under the Preliminary Alternative Elements, explain the "Administrative Use" designation.

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84358 **Organization Type:** Unaffiliated Individual
Representative Quote: Restrict "play areas." WHAT ARE PLAY AREAS?

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84363 **Organization Type:** Unaffiliated Individual
Representative Quote: Implement a self-certification" permit system. SELF CERTIFICATION FOR WHAT?

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84356 **Organization Type:** Unaffiliated Individual
Representative Quote: close all or certain parts...NOT CLEAR ENOUGH FOR ME TO COMMENT

AL5002 - PRELIMINARY ALTERNATIVE ELEMENT: SEPARATION OF VISITOR USES

Concern ID: 17961

CONCERN STATEMENT: One commenter disagreed with the alternative that would establish zones for visitor use.

Representative Quote(s): **Corr. ID:** 9 **Organization:** *Not Specified*
Comment ID: 84357 **Organization Type:** Unaffiliated Individual
Representative Quote: Establish zones to separate different types of visitor use. DON'T LIKE THE SOUND OF THIS ONE.

Concern ID: 17962

CONCERN STATEMENT: One commenter advocated the use of multiple use trails to combine recreational uses.

Representative Quote(s): **Corr. ID:** 7 **Organization:** *Not Specified*
Comment ID: 84340 **Organization Type:** Unaffiliated Individual
Representative Quote: Multiple use trails - combine vs. separate uses

Concern ID: 17963

CONCERN STATEMENT: One commenter supported the Management Methodology objective, as well as alternative elements that would involve the establishment of recreational use zones and limitation of motorized recreational areas.

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 83560 **Organization Type:** Unaffiliated Individual
Representative Quote: It appears that Curecanti is on the right track with the Management Methodology listed in the scoping notice and we particularly support elements of the proposed action that include limiting motorized play areas and establishing zones for separating visitor uses.

***AL5003 - PRELIMINARY ALTERNATIVE ELEMENT: EDUCATIONAL/
INFORMATIONAL MATERIALS***

Concern ID: 17964

CONCERN STATEMENT: Commenters supported the use of additional educational materials and provided suggestions including signs showing restricted areas and maps at the visitor center.

Representative Quote(s): **Corr. ID:** 7 **Organization:** Not Specified
Comment ID: 84253 **Organization Type:** Unaffiliated Individual
Representative Quote: Map at visitor center

Corr. ID: 7 **Organization:** Not Specified
Comment ID: 84250 **Organization Type:** Unaffiliated Individual
Representative Quote: Signage: show where it is if restricting an area

Corr. ID: 9 **Organization:** Not Specified
Comment ID: 84361 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide educational/informational materials. ALWAYS A GOOD IDEA.

***AL5004 - PRELIMINARY ALTERNATIVE ELEMENT: DESIGNATE ROUTES AND AREAS
TO PROTECT RESOURCES***

Concern ID: 17965

CONCERN STATEMENT: Commenters suggested that the National Park Service consider the impacts of ORV use on park resources and designate areas appropriate or inappropriate for vehicle use or access. Commenters expressed concern about allowing vehicles to access areas below the high water line, on the reservoir, and off of existing roads.

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 83562 **Organization Type:** Unaffiliated Individual
Representative Quote: Based on the above regulations that guide motorized use within National Park units and the many adverse effects from snowmobile use, we encourage Curecanti to take a close look at the need for allowing snowmobile use on Blue Mesa Reservoir and also any motorized use below the high water mark.

Corr. ID: 4 **Organization:** Wildlands CPR
Comment ID: 85461 **Organization Type:** Unaffiliated Individual
Representative Quote: The Organic Act, 16 U.S.C. § 1 et seq. ("Organic Act"), created the National Park Service and directed it to "promote and regulate the use of the [National Park System] by such means and measures as conform to the fundamental purpose of the [National Park System], which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 16 U.S.C. § 1 (emphasis added). The Organic Act further empowers the Secretary of the Interior to issue regulations to carry out the purposes articulated in 16 U.S.C. §§ 1 and 1a-1. 16 U.S.C. § 3. The fundamental purpose of the National Park System the conservation of our national heritage for the enjoyment of future generations was reaffirmed by Congress in 1978: Congress further reaffirms, declares, and directs that the promotion and regulation of the various areas of the National Park System . . . shall be consistent with and founded in the purpose established by [16 U.S.C. § 1] to the common benefit of all the people of the United States. The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high

public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established. 16 U.S.C. § 1a-1. In the NPS' own words, "when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant." NPS Management Policies § 1.4.3 (2006). National Parks are "the physical remnants of our past great scenic and natural places that continue to evolve, repositories of outstanding recreation opportunities, classrooms of our heritage, and the legacy we leave to future generations and they warrant the highest standard of protection." NPS Management Policies § 1.2 (2006) Finally, the NPS Management Policies also reference the preservation of natural soundscapes in Section 4.9 Soundscape Management. This section requires that the NPS "preserve, to the greatest extent possible, the natural soundscapes of parks." We urge Curecanti to take this guidance to heart and seriously consider the impacts of allowing any type of motorized use below the high water mark and on the reservoir itself.

Corr. ID: 4 **Organization:** Wildlands CPR
Comment ID: 83559 **Organization Type:** Unaffiliated Individual
Representative Quote: We appreciate this opportunity to provide comments during the early phases of development of this proposal and urge Curecanti National Recreation Area to take the route of highest ecological integrity and protection for the NRA and prohibit the use of all motorized vehicles off designated system roads.

Corr. ID: 4 **Organization:** Wildlands CPR
Comment ID: 82243 **Organization Type:** Unaffiliated Individual
Representative Quote: We do not feel that motorized use of areas below the high water line of Curecanti's reservoirs or use of snowmobiles on frozen reservoirs is appropriate for a unit of our National Park system.

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84254 **Organization Type:** Unaffiliated Individual
Representative Quote: Designate areas for certain uses

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84248 **Organization Type:** Unaffiliated Individual
Representative Quote: Identify areas appropriate/inappropriate for motorized vehicle access below HWL

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84349 **Organization Type:** Unaffiliated Individual
Representative Quote: Confine motorized vehicle access to designated routes, etc. GOOD.

Concern ID: 17966

CONCERN STATEMENT: Commenters suggested that the National Park Service provide a reasonable amount of access and trails, including maintaining or increasing the current level of access.

Representative Quote(s): **Corr. ID:** 1 **Organization:** Citizen USA and tax payer
Comment ID: 83550 **Organization Type:** Unaffiliated Individual
Representative Quote: I encourage you to provide an ever increasing amount (mileage) of designated motorized trails in this area.

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84344 **Organization Type:** Unaffiliated Individual
Representative Quote: Don't be selective about allowing access

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84343 **Organization Type:** Unaffiliated Individual
Representative Quote: Maintain traditional access - evaluate impacts if keep open and determine appropriateness

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84336 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide reasonable access

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84318 **Organization Type:** Unaffiliated Individual
Representative Quote: Maintain reasonable density/amount of trails

Concern ID: 17967
CONCERN STATEMENT: Commenters suggested that use areas should be concentrated to minimize impacts, including minimizing the potential for braided trails.

Representative Quote(s): **Corr. ID:** 7 **Organization:** *Not Specified*
Comment ID: 84330 **Organization Type:** Unaffiliated Individual
Representative Quote: Concentrate use to minimize impacts

Corr. ID: 7 **Organization:** *Not Specified*
Comment ID: 84345 **Organization Type:** Unaffiliated Individual
Representative Quote: Limit potential for "braided trails"

AL5005 - PRELIMINARY ALTERNATIVE ELEMENT: TEMPORARY/SEASONAL CLOSURES

Concern ID: 17969
CONCERN STATEMENT: Commenters indicated their support for seasonal closures to prevent road damage and reduce impacts to species

Representative Quote(s): **Corr. ID:** 5 **Organization:** Bureau of Land Management
Comment ID: 84232 **Organization Type:** Federal Government
Representative Quote: Our plans will call for spring mud season closure areas every year to prevent damage to roads when they are wet from melting snow as well as Sage Grouse closures to protect birds on the leks from 3/15 to 5/15. Similarly, we are calling for the flexibility to implement seasonal closures on important big game winter range only in years when heavy snows threaten their survival (like last winter).

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84351 **Organization Type:** Unaffiliated Individual
Representative Quote: Implement seasonal closures...GOOD

AL5006 - PRELIMINARY ALTERNATIVE ELEMENT: SNOWMOBILE ACCESS

Concern ID: 17970
CONCERN STATEMENT: Commenters approved of snowmobile management and recommended that the National Park Service evaluate what areas would be appropriate or inappropriate for snowmobile use and access.

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 84279 **Organization Type:** Unaffiliated Individual
Representative Quote: We would recommend that in addition to evaluating the appropriateness of motorized (both summer and winter) use below high water mark, that Curecanti NRA also re-evaluate the use of snowmobiles on the frozen surface of Blue Mesa Reservoir.

Corr. ID: 7 **Organization:** Not Specified
Comment ID: 84342 **Organization Type:** Unaffiliated Individual
Representative Quote: Snowmobile use below HWL OK, but on surrounding lands adds to stress on wildlife during sensitive winter periods

Corr. ID: 7 **Organization:** Not Specified
Comment ID: 84341 **Organization Type:** Unaffiliated Individual
Representative Quote: Continue to allow snowmobile use on frozen surface only

Corr. ID: 9 **Organization:** Not Specified
Comment ID: 84362 **Organization Type:** Unaffiliated Individual
Representative Quote: Management of snowmobiles. THIS ALTERNATIVE SOUNDS O.K.

AL5007 - PRELIMINARY ALTERNATIVE ELEMENT: RESTRICT ORV PLAY AREAS

Concern ID: 17973
CONCERN STATEMENT: One commenter stated that motorized play areas are not appropriate in National Park units and that motorized vehicle use should only be allowed on roads.

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 83561 **Organization Type:** Unaffiliated Individual
Representative Quote: Motorized play areas are inappropriate in a National Park unit, and use of motorized vehicles should be restricted to roads in order to best preserve the resources of the park

AL5008 - PRELIMINARY ALTERNATIVE ELEMENT: PARKING AREAS

Concern ID: 17974
CONCERN STATEMENT: Commenters supported the use of turnouts and parking areas in the park

Representative Quote(s): **Corr. ID:** 4 **Organization:** Wildlands CPR
Comment ID: 83564 **Organization Type:** Unaffiliated Individual
Representative Quote: Parking areas and designated pull-outs are an alternative to permitting driving below the high water mark.

Corr. ID: 9 **Organization:** *Not Specified*
Comment ID: 84350 **Organization Type:** Unaffiliated Individual
Representative Quote: Provide additional turnouts...GOOD

AL5009 - PRELIMINARY ALTERNATIVE ELEMENT: MOBILITY-IMPAIRED ACCESS

Concern ID: 17975
CONCERN STATEMENT: One commenter expressed concern regarding the use of the term “appropriate” when referring to the amount of access provided for mobility-impaired visitors.

Representative Quote(s): **Corr. ID:** 9 **Organization:** *Not Specified*
Comment ID: 84360 **Organization Type:** Unaffiliated Individual
Representative Quote: Maintain appropriate access for mobility-impaired visitors. DEPENDS ON WHAT "APPROPRIATE" MEANS.

CC1000 - CONSULTATION AND COORDINATION: GENERAL COMMENTS

Concern ID: 17976
CONCERN STATEMENT: One commenter offered assistance from Western Area Power Administration (WAPA) through the loan of equipment and/or personnel if motorized vehicle routes serve WAPA needs. Commenters also suggested coordination between WAPA, the Bureau of Land Management, and the National Park Service to ensure that motorized vehicle access routes are maintained and that the federal agencies are employing consistent management strategies.

Representative Quote(s): **Corr. ID:** 5 **Organization:** Bureau of Land Management
Comment ID: 84286 **Organization Type:** Federal Government
Representative Quote: It would make sense for the NPS to look over our guidelines and try to mirror them as much as possible. If all the federal agencies in the valley are doing the same thing in the same way it will be easier for us to explain our regs to the public and for them to understand the rules.

Corr. ID: 8 **Organization:** Western Area Power Administration
Comment ID: 84348 **Organization Type:** Federal Government
Representative Quote: Western is willing to discuss with your office any needed road or trail improvement project where Western can provide assistance through the loan of equipment and/or personnel if the road or trail serves Western's access needs. In addition, Western is willing to consider installation of a gate or other type of barrier if one is needed to limit access to any of its facilities located within these NPS units. Western suggests that we partner on the coordination and identification of access needed by Western to its facilities and work together, as necessary, to ensure that the roads or trails used by us are adequately improved and maintained, and continue to remain open for administrative use by NPS personnel and Western's construction and maintenance crews on a year round basis.

Corr. ID: 8

Organization: Western Area Power Administration

Comment ID: 84347

Organization Type: Federal Government

Representative Quote: Western requires continuous and uninterrupted access to its facilities. Therefore, if the NPS designates a specific road or trail "CLOSED," whether as a permanent closure or a temporary one to allow for resource recovery, Western will still need to access its facilities. Access needs to most of Western's facilities are minimal. They often can be served by a vegetated roadbed or two-track trail, but in some instances, Western will need to reconstruct or reestablish the old trails or roads, and may need to build new access to allow for the transportation of equipment and personnel to maintain, operate, or reconstruct our facilities. Therefore, Western requests that any travel planning effort by the NPS include legitimate and authorized uses or lands contained in the Curecanti NRA and Black Canyon of the Gunnison NP, uses that typically require some type of on-the-ground vehicular access. Western requests, in this planning effort and any subsequent travel management plans, that you provide language to ensure power facilities located on these NPS units can be adequately and consistently constructed, reconstructed, operated, and maintained, as needed.

Concern ID:

17977

**CONCERN
STATEMENT:**

Commenters suggested that the National Park Service coordinate with surrounding land owners (including other federal agencies) during the planning process.

Representative Quote(s):

Corr. ID: 5

Organization: Bureau of Land Management

Comment ID: 84224

Organization Type: Federal Government

Representative Quote: The BLM and Forest Service are currently working on a Transportation management plan for our lands in the Gunnison Basin. I can provide either hard copy maps or GIS shapefiles for each of these alternatives for your consideration.

Corr. ID: 5

Organization: Bureau of Land Management

Comment ID: 84225

Organization Type: Federal Government

Representative Quote: I think it is important for the NPS transportation planning effort to consider the routes being proposed for inclusion as designated routes in our transportation plan to try to achieve reasonable agreement and connectivity across agency boundaries.

Corr. ID: 6

Organization: *Not Specified*

Comment ID: 84245

Organization Type: Unaffiliated Individual

Representative Quote: Work cooperatively with surrounding land owners to minimize impacts from ORV use.

Corr. ID: 6

Organization: *Not Specified*

Comment ID: 84246

Organization Type: Unaffiliated Individual

Representative Quote: Ponderosa/Soap Creek access - coordinate with USFS

CI1000 - CUMULATIVE IMPACTS: REASONABLY FORESEEABLE ACTIONS

Concern ID: 17978

CONCERN STATEMENT: Commenters noted ongoing transportation planning projects that could contribute to cumulative impacts.

Representative Quote(s):

Corr. ID: 5

Organization: Bureau of Land Management

Comment ID: 84238

Organization Type: Federal Government

Representative Quote: The BLM and Forest Service are currently working on a Transportation management plan for our lands in the Gunnison Basin. We have done our scoping, prepared alternatives and are working on the EIS now. Along with the No Action alternative we have 3 other alternatives that we are considering. Our timeframe for completion of our process is around summer 09 depending on protests or appeals.

GA1001 - IMPACTS FROM SNOWMOBILE USE

Concern ID: 17979

CONCERN STATEMENT: One commenter described the results of scientific studies that have been conducted by the National Park Service regarding the impacts of snowmobiles on air quality, noise, wildlife habitat, and water pollution.

Representative Quote(s):

Corr. ID: 4

Organization: Wildlands CPR

Comment ID: 85462

Organization Type: Unaffiliated Individual

Representative Quote: Snowmobiles can have a lasting impact on our environment, including creating noise, air, and water pollution, which can affect the quality of wildlife habitat. Use of snowmobiles can also have a dramatic impact on the recreational experience of non-motorized visitors. Yellowstone National Park found that the two-stroke engines of snowmobiles dump 25% of their gasoline and oil unburned into the environment (U.S. Department of Interior, 1995). Snowmobiles account for 35 to 68% of carbon monoxide and 68 to 90% of hydrocarbons released annually in the park (U.S. Department of the Interior, National Park Service. 2000. Air quality concerns related to snowmobile usage. Yellowstone National Park: Air Resources Division.). Noise from snowmobiles, particularly when used on a flat open area such as a frozen lake, will travel a great distance. See National Park Service Natural Sounds Program Center, Annotated Bibliography on Visitor Impacts from Noise, available at <http://www.nature.nps.gov/naturalsounds/publications/>. We draw particular attention to the resources contained within this report, and hope that Curecanti will implement a plan that reflects this research on the soundscapes.

IC100 - ISSUES - CULTURAL RESOURCE ISSUES

Concern ID: 17980

CONCERN STATEMENT: One commenter encouraged the National Park Service to develop a plan that will protect cultural and environmental resources while providing for responsible vehicular recreation.

Representative Quote(s):

Corr. ID: 2

Organization: High Country Citizens' Alliance

Comment ID: 83553

Organization Type: Unaffiliated Individual

Representative Quote: We encourage NPS to develop a plan that is protective of environmental and cultural resources while also preserving opportunities for responsible vehicular recreation.

IN100 - ISSUES - NATURAL RESOURCE ISSUES

Concern ID: 17981
CONCERN STATEMENT: Commenters noted potential natural resource issues associated with vehicle use, including stress to wildlife and habitat.

Representative Quote(s): **Corr. ID:** 7 **Organization:** Not Specified
Comment ID: 84333 **Organization Type:** Unaffiliated Individual
Representative Quote: Impacts to wildlife are of concern. Habitat degraded by trail networks

IV100 - ISSUES - VISITOR USE OR EXPERIENCE ISSUES

Concern ID: 17982
CONCERN STATEMENT: Commenters noted possible negative impacts to elderly visitors and hunters due to potential closures, impacts from noise pollution, and noted the importance of primitive experience opportunities.

Representative Quote(s): **Corr. ID:** 2 **Organization:** High Country Citizens' Alliance
Comment ID: 83554 **Organization Type:** Unaffiliated Individual
Representative Quote: We also urge the Park Service to consider existing and potential recreation use conflicts resulting from noise, differing types of recreation use and concentrations of recreation activity in portions of the recreation area.

Corr. ID: 7 **Organization:** Not Specified
Comment ID: 84335 **Organization Type:** Unaffiliated Individual
Representative Quote: Soap Creek:

Closures impact older users who can't access shoreline on foot

Closures on USFS lands affect older hunters

Corr. ID: 7 **Organization:** Not Specified
Comment ID: 84331 **Organization Type:** Unaffiliated Individual
Representative Quote: Important to maintain opportunities for primitive experiences

PN3000 - PURPOSE AND NEED: SCOPE OF THE ANALYSIS

Concern ID: 17984
CONCERN STATEMENT: One commenter suggested that the National Park Service should consider mountain bike issues during the planning process

Representative Quote(s): **Corr. ID:** 5 **Organization:** Bureau of Land Management
Comment ID: 84228 **Organization Type:** Federal Government
Representative Quote: I know this is a motorized plan for the NPS but I encourage you to also consider mountain bike issues either in this plan or another planning effort. On BLM and FS we have found enough demand for this use and enough problems with the impacts of mountain bikes on our land that we are including them in the mix of uses that we are planning for in our transportation plan. There are already several places where mountain bikers are creating new unauthorized routes on NPS to get up to BLM (such as North Beaver Creek) or where new routes starting on BLM are leading down to new routes on NPS. Bikers are also starting to use the South Willow Creek road on

NPS as a trailhead to create unauthorized routes on both agencies. Along with the resource damage to soils, vegetation and wildlife caused by these unauthorized and often poorly placed trails they often lead to expanded use by motorcycles or ATVs making it a motorized issue.

Concern ID: 18015

CONCERN STATEMENT: One commenter suggested that the National Park Service expand the purpose of the proposed project to include access to powerlines and related facilities.

Representative Quote(s): **Corr. ID:** 3 **Organization:** Western Area Power Administration
Comment ID: 83555 **Organization Type:** Federal Government
Representative Quote: Expand the Purpose to include the access to the powerlines and related facilities since the NPS will be making management decisions that could affect these roads (i.e., requiring gates to limit public access and/or closing roads to the public and limiting them to administrative use only).

PN8000 - PURPOSE AND NEED: OBJECTIVES IN TAKING ACTION

Concern ID: 17985

CONCERN STATEMENT: Commenters suggested expanding the objectives of the project to include meeting legitimate uses of access roads and limiting damage to these roads used by adjacent landowners and agencies.

Representative Quote(s): **Corr. ID:** 3 **Organization:** Western Area Power Administration
Comment ID: 83557 **Organization Type:** Federal Government
Representative Quote: Expand objectives to include limiting damage to roads used by Western since Western maintains them.

Corr. ID: 3 **Organization:** Western Area Power Administration
Comment ID: 83556 **Organization Type:** Federal Government
Representative Quote: Expand the Management Methodology criteria to include meeting legitimate uses of roads, such as Western's access and access routes used by landowners or other Federal agencies to get to parcels either within the management boundary for Curecanti or outside the NRA where access through Curecanti is the only way to get to these lands.

APPENDIX 1. CORRESPONDENCE INDEX OF ORGANIZATIONS

Correspondence ID	Author	Organization	Form Letter
Conservation/Preservation			
2	Dan Morse	High Country Citizens' Alliance	No
4	Sarah Peters	Wildlands CPR	No
Federal Government			
5	Arden Andersen	BLM	No
3	Susan Starcevich	WAPA	No
8	Steven Webber	WAPA	No

APPENDIX 2. CORRESPONDENCE INDEX OF INDIVIDUAL COMMENTERS

Correspondence ID	Author	Form Letter
1	Kent Sundgren	No
9	John Trammel	No

APPENDIX 3. INDEX BY ORGANIZATION TYPE

Org. Type	Organization Name	Corr. ID	Code(s)
Federal Government			
	Bureau of Land Management	5	AL5005, CC1000, CI1000, PN3000
	Western Area Power Administration	3	AL4001, PN3000, PN8000
	Western Area Power Administration	8	CC1000
Unaffiliated Individual			
	Citizen USA and Tax Payer	1	AL5004
	High Country Citizens' Alliance	2	IC100, IN100, IV100
	Wildlands CPR	4	AL4000, AL5002, AL5004, AL5006, AL5007, AL5008, GA1001
	N/A	6	CC1000
		7	AL4000, AL5002, AL5003, AL5004, AL5006, GA1001, IN100, IV100
		9	AL4001, AL5002, AL5003, AL5004, AL5005, AL5006, AL5008, AL5009

APPENDIX 4. INDEX BY CODE

AL4000 - Alternatives: New Alternatives Or Elements

Wildlands CPR - 4

Unaffiliated individual - 7

AL4001 - Questions About Alternative Element Terminology

Western Area Power Administration - 3

Unaffiliated individual - 9

AL5002 - Preliminary Alternative Element: Separation of Visitor Uses

Wildlands CPR - 4

Unaffiliated individual - 7 , 9

AL5003 - Preliminary Alternative Element: Educational/Informational Materials

Unaffiliated individual - 7 , 9

AL5004 - Preliminary Alternative Element: Designate Routes and Areas to Protect Resources

Unaffiliated individual - 1

Wildlands CPR - 4

N/A - 7 , 9

AL5005 - Preliminary Alternative Element: Temporary/Seasonal Closures

Bureau of Land Management - 5

Unaffiliated individual - 9

AL5006 - Preliminary Alternative Element: Snowmobile Access

Wildlands CPR - 4

Unaffiliated individual - 7 , 9

AL5007 - Preliminary Alternative Element: Restrict ORV Play Areas

Wildlands CPR - 4

AL5008 - Preliminary Alternative Element: Parking Areas

Wildlands CPR - 4

Unaffiliated individual - 9

AL5009 - Preliminary Alternative Element: Mobility-impaired Access

Unaffiliated individual - 9

CC1000 - Consultation and Coordination: General Comments

Bureau of Land Management - 5

Western Area Power Administration - 8

Unaffiliated individual - 6

CI1000 - Cumulative Impacts: Reasonably Foreseeable Actions

Bureau of Land Management - 5

GA1001 - Impacts From Snowmobile Use

Wildlands CPR - 4

Unaffiliated individual - 7

August 19, 2008

IC100 - ISSUES - Cultural resource issues

High Country Citizens' Alliance - 2

IN100 - ISSUES - Natural resource issues

High Country Citizens' Alliance - 2

Unaffiliated individual - 7

IV100 - ISSUES - Visitor use or experience issues

High Country Citizens' Alliance - 2

Unaffiliated individual - 7

PN3000 - Purpose And Need: Scope Of The Analysis

Bureau of Land Management - 5

Western Area Power Administration - 3

PN8000 - Purpose And Need: Objectives In Taking Action

Western Area Power Administration - 3

**APPENDIX 5. COPIES OF LETTERS, EMAILS, AND FAXES
RECEIVED (EXCLUDING NON-AFFILIATED COMENTERS)**

Niosi, Dan

From: Dave_Roberts@nps.gov
Sent: Wednesday, July 16, 2008 2:02 PM
To: Lindsay_Gillham@nps.gov; Niosi, Dan
Subject: Email comments from Gunnison Field Office, BLM

I'm forwarding an email comment from Arden Anderson, who is with BLM in Gunnison.

~ ~ ~ ~ ~
Dave Roberts, Management Assistant
Black Canyon of the Gunnison National Park Curecanti National Recreation Area
2465 South Townsend Avenue
Montrose, CO 81401
Voice: 970.240.5432 Fax: 970.240.5368

----- Forwarded by Dave Roberts/CURE/NPS on 07/16/2008 01:58 PM -----

Arden_Anderson@bl m.gov	To: Dave_Roberts@nps.gov
sally_thode@blm.gov, gshellhorn@fs.fed.us	cc: Kenny_McDaniel@blm.gov,
07/15/2008 12:13	Subject: Re: Comments due July 11 for
Scoping, Motorized Access Plan for Curecanti PM CST	

Hi Dave,

Sorry I am late with this but I have way too many #1 priorities on my plate right now. I tried to make comments on your website but since I am past due the document wasn't open to submit comments. I will try to put in some quick comments to you and hopefully you can pass them on to the contractors.

1) The BLM and Forest Service are currently working on a Transportation management plan for our lands in the Gunnison Basin. We have done our scoping, prepared alternatives and are working on the EIS now. Along with the No Action alternative we have 3 other alternatives that we are considering. I can provide either hard copy maps or GIS shapefiles for each of these alternatives for your consideration. Right now we are leaning toward Alternative 2 as a preferred alternative but things could change after public review and input. I think it is important for the NPS transportation planning effort to consider the routes being proposed for inclusion as designated routes in our transportation plan to try to achieve reasonable agreement and connectivity across agency boundaries. If you know what we are doing you can take that into consideration in your planning. Likewise, if there are things you need to do on NPS ground it will be important for us to know that and consider the connectivity issues in our planning process. Our timeframe for completion of our process is around summer 09 depending on protests or appeals.

2) I know this is a motorized plan for the NPS but I encourage you to also consider mountain bike issues either in this plan or another planning effort. On BLM and FS we have found enough demand for this use and enough problems with the impacts of mountain bikes on our land that we are including them in the mix of uses that we are planning for in our transportation plan. There are already several places where mountain bikers are creating new unauthorized routes on NPS to get up to BLM (such as North Beaver Creek) or where new routes starting on BLM are leading down to new routes on NPS. Bikers are also starting to use the South Willow Creek road on NPS as a trailhead to create unauthorized routes on both agencies. Along with the resource damage to soils, vegetation and wildlife caused by these unauthorized and often poorly placed trails they often lead to expanded

use by motorcycles or ATVs making it a motorized issue. Left unchecked this problem will only continue to grow. The more people that get used to using an illegal trail system the harder it is to discourage people from using those trails. The sooner you deal with the problem the easier it will be to handle.

3) Our plans will call for spring mud season closure areas every year to prevent damage to roads when they are wet from melting snow as well as Sage Grouse closures to protect birds on the leks from 3/15 to 5/15. It would make sense for the NPS to look over our guidelines and try to mirror them as much as possible. If all the federal agencies in the valley are doing the same thing in the same way it will be easier for us to explain our regs to the public and for them to understand the rules. Similarly, we are calling for the flexibility to implement seasonal closures on important big game winter range only in years when heavy snows threaten their survival (like last winter). It would be nice if the NPS could follow suit if it makes sense.

Those are the main issues that occur to me at this time. More may come up over time. I will be glad to provide more detail on any of these issues if you need it. Please include me on the emailing list for this planning effort. Thanks for the opportunity to provide comments during scoping.

Arden Anderson
Recreation and Wilderness Specialist
BLM - Gunnison Field Office - Colorado
(970) 642-4454

***** Thought for the Day

We abuse land and resources because we regard them as commodities that belong to us. When we see nature as a community to which we belong we may begin to treat it with care and respect.

CURE 60



Department of Energy
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

APR 29 2008

Lindsay Gillham
Project Manager
National Park Service
P.O. Box 25287
Denver, CO 80225

RE: Curecanti National Recreation Area Travel Management

Dear Ms. Gillham:

Western Area Power Administration (Western) is pleased to offer the following comments concerning travel management in the Curecanti National Recreation Area (NRA) and Black Canyon of the Gunnison National Park based on the recent meeting between the National Park Service (NPS) staff from Grand Junction and Curecanti NRA and Western personnel from the Western Colorado Field Maintenance Office located in Montrose. We believe the comments provided below will provide you with the information you need to complete your planning effort.

Western is a Federal power marketing administration within the Department of Energy responsible for the safe and reliable operation and delivery of electricity from Federal hydropower projects. In that role, Western operates and maintains on behalf of the American people over 17,000 miles of transmission lines and related facilities in 15 western states. Some of our power facilities, including transmission lines, substations, switch yards, communication sites, and access to these facilities, are located on NPS-administered lands. Enclosed is a disk containing the location information of Western's facilities together with the road data showing all the access routes used by Western to operate and maintain its transmission lines and related facilities. We have spoken to Ms. Nancy Shock of your office and she is aware that the disk is coming. Please coordinate with her to ensure the NPS has the necessary information it needs to properly identify and categorize the access used by Western.

Western requires continuous and uninterrupted access to its facilities. Therefore, if the NPS designates a specific road or trail "CLOSED," whether as a permanent closure or a temporary one to allow for resource recovery, Western will still need to access its facilities. In addition, sometimes roads are damaged by weather or overuse so significant repair and/or replacement work may be necessary at some point in the future. Access may need to be restored where trails or roads have disappeared over time, because of revegetation, sloughing of surrounding lands, other types of construction, or deterioration of the road due to improper use. Access needs to most of Western's facilities are minimal. They often can be served by a vegetated roadbed or two-track trail, but in some instances, Western will need to reconstruct or reestablish the old trails or roads, and may need to build new access to allow for the transportation of equipment and personnel to maintain, operate, or reconstruct our facilities.

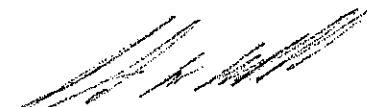
2

Therefore, Western requests that any travel planning effort by the NPS include legitimate and authorized uses of lands contained in the Curecanti NRA and Black Canyon of the Gunnison NP, uses that typically require some type of on-the-ground vehicular access. Western requests, in this planning effort and any subsequent travel management plans, that you provide language to ensure power facilities located on these NPS units can be adequately and consistently constructed, reconstructed, operated and maintained, as needed.

Western would like to reiterate that it, too, is a Federal agency that must meet and comply with all environmental requirements, including obtaining necessary cultural and biological clearances prior to the start of any construction, reconstruction, maintenance or operation activity, whether it is a pole replacement, rebuilding a communication sites, completing necessary road work, conducting routine inspections, or starting new construction. Western is willing to discuss with your office any needed road or trail improvement project where Western can provide assistance through the loan of equipment and/or personnel if the road or trail serves Western's access needs. In addition, Western is willing to consider installation of a gate or other type of barrier if one is needed to limit access to any of its facilities located with these NPS units. Western suggests that we partner on the coordination and identification of access needed by Western to its facilities and work together, as necessary, to ensure that the roads or trails used by us are adequately improved and maintained, and continue to remain open for administrative use by NPS personnel and Western's construction and maintenance crews on a year round basis.

Thank you for the opportunity to express our concerns regarding your travel management planning efforts. If you have questions or would like to discuss our concerns further, please contact Ms. Susan Starcevich at 720-962-7275 or starcevi@wapa.gov.

Sincerely,



Steven W. Webber
Lands Team Lead

Enclosure