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January 10, 2012

Karl Mendonca, Acting Field Manager
Via U.S. Mail and email kmendonc@blm.gov
U.S. Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, CO 81652

Dave Stout, Field Manager
Via U.S. Mail and email dstout@blm.gov
U.S. Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459

Leigh D. Espy, Deputy State Director
Via U.S. Mail and email lespy@blm.gov
U.S. Bureau of Land Management
Resources and Fire
2850 Youngfield Street
Lakewood, CO 80215

Re: Draft Resource Management Plan/Draft Environmental Impact Statement (DRMP/DEIS) for
U.S. Bureau of Land Management (BLM) Kremmling and Colorado River Valley Field Offices and
U.S. Forest Service (USFS) White River National Forest

Dear Mr. Mendonca, Mr. Stout and Ms. Espy:

The Board of County Commissioners for Grand County, Colorado (Grand County) appreciates the Bureau of Land Management (BLM) including Grand County as a Cooperating Agency (CA) in the update of the Kremmling Field Office Draft Resource Management Plan (KRMP). The BLM and Grand County have had a solid working relationship through the years and trust that relationship will continue under the new RMP. Grand County likewise appreciates the cooperation and public outreach that BLM's staff and USFS's staff have demonstrated in the RMP process.

Grand County's comments are broken into two general categories; those related to Wild and Scenic Rivers Act issues and water flow related matters and those related to other aspects of the KRMP unrelated to Wild and Scenic Rivers Act.

Comments re: Wild and Scenic Rivers Act

1. Grand County, as a Cooperating Agency, requests the BLM and USFS to adopt and implement the Stakeholder Group Plan disclosed as Alternative "B2" related to Wild and Scenic River Act matters.

With respect to Wild and Scenic River Act matters, Grand County has been keenly interested in Colorado River Segments 4 and 5, which covers about 20.62 miles between the mouth of Gore Canyon and State Bridge within the KRMP. Over the past several years, Grand County has spent over one million dollars developing a Stream Management Plan that includes these two segments of the Colorado River as it flows through Grand County (*See Draft Report Stream Management Plan Phase 3, Grand County, Colorado August 2010, and CR 7 which overlaps these two reaches*). Grand County has also been an active member of a broad-based group of water providers (both East and West Slope), conservationist, local governments, private landowners, recreational boaters, who in consultation with the Colorado Parks and Wildlife and the Colorado Water Conservation Board, have submitted a consensus based and locally driven plan to the BLM and USFS related to the Wild and Scenic Rivers Act to protect the outstandingly remarkable values (ORVs) for the Upper Colorado River Segments 4 through 7. This plan is called the *Upper Colorado River Wild and Scenic Stakeholder Group Management Plan* (Stakeholder Group Plan).

For Wild and Scenic Rivers Act, the DRMP/DEIS discloses the BLM and USFS Preferred Alternative as Alternative B on these issues. In turn Alternative "B" is divided into two Alternatives: (1) Alternative "B1" under which the BLM would, among other things, find Colorado River segments 4 and 5 "suitable" for designation by Congress. (2) Alternative "B2" under which the BLM would, among other things, "defer suitability" for Colorado River segments 4 and 5 and recommend adopting and implementing the Stakeholder Group Plan.

On January 10, 2012, the Stakeholder Group submitted a joint letter requesting that Alternative B2, be adopted and implemented by the BLM and USFS. Grand County signed onto that letter, reaffirms its commitment in support for the Stakeholder Group Plan, and endorses the comments set out in the letter.

Grand County believes that either Alternative B1 or Alternative B2 are supported by the record and the DRMP/DEIS, and especially with respect to Colorado River segments 4 and 5. However, Grand County endorses the Stakeholder Group Plan disclosed as Alternative B2 as the preferred method to protect the ORVs. The Stakeholder Group Plan has a number of cooperative measures that can and will be brought to the table to protect the ORVs. In its role as a Cooperating Agency, and as one of the entities most affected by the BLM's decision because the Colorado River flows through such a large segment of the county, Grand County respectfully requests the BLM and USFS adopt and implement the Stakeholders Group Plan as Alternative B2.

Comments re: Other Aspects of KRMP

Plan Flexibility

Considering the last plan was in effect from 1984 until present, this plan should allow for a large degree of flexibility due to unforeseen changes in the political climate and usage of the BLM lands.

Economic Effects to Agriculture

Limiting the use of All Terrain Vehicles (ATV's) for agricultural producers moving cattle should be re-evaluated. Local area ranchers have traditionally moved their cattle to, from and across BLM lands throughout the year. Limiting or eliminating this use may cause a significant negative impact to our agricultural community and should be critically evaluated. At a minimum, historic uses of ATV's by agricultural producers must be allowed to continue.

Gore Canyon Whitewater Park

Grand County is currently working with the BLM on establishing an upper Colorado River Gore Canyon Whitewater Park. There are two locations on BLM Lands within the management area that are under consideration; Inspiration Point below Bob's Island and Pumphouse. The KRMP should support this collaborated effort to create these important recreational improvements under Recreation Management Zone (RMZ) 2, Gore Canyon and RMZ 3, Pumphouse. In support of this use, we strongly encourage closing RMZ 2 and 3 to Mineral Leasing.

Travel Management and Transportation

One of the major management actions as shown in the KRMP is to reduce the density of roads and trails in priority big game habitats by closing and revegetating duplicate roads or trails and closing and revegetating routes on BLM lands. Any closure of trails or access on public lands is a major decision that could affect agricultural and forestry operations, tourism, hunting, biking, hiking, and many other recreational opportunities within Grand County. In the spirit of active collaboration between local entities and BLM officials, Grand County requests the BLM allow for a public comment period of at least 90 days prior to any proposed closure(s). Any public comment period should be preceded by published public notification, as well as written notice to the Grand County Commissioners.

The Kremmling Airport is scheduled for future expansion, which may include BLM grounds east of the existing airport. Grand County requests that all sections within the KRMP that may affect the possibility of future airport expansion be analyzed and address the future expansion.

Oil and Gas Leasing

The BLM must consider all factors in the analysis and management options in relation to oil and gas leasing and extraction. The local ecosystem is very fragile and much care should be taken to protect it in order to preserve the County's natural beauty. The KRMP should address a comprehensive analysis of the socioeconomic benefits of oil and gas resource extraction within this management area. Grand County is concerned that the exploration and extraction of Oil and Gas could have drastic negative consequences on our local environment and infrastructure, including grazing lands, critical winter wildlife and Sage Grouse habitat.

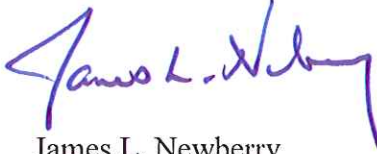
Two of the most serious issues within the planning area are water resources and water quality. Grand County is a unique and sensitive area due to being the headwaters for the Colorado River. Water quality in all tributaries to the Colorado river is of serious concern, as they provide irrigation

water to several area ranches, and they are critical to the ranching and fishing economy in Grand County. Any oil and gas leasing on BLM lands must consider impacts to water quality.

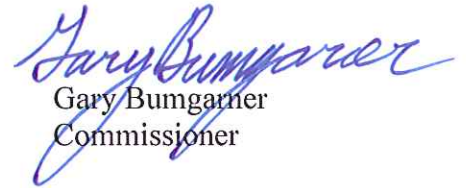
Again, Grand County appreciates the opportunity to comment on the Kremmling Resource Management Plan.



Nancy Stuart
Chairman



James L. Newberry
Commissioner



Gary Bumgarner
Commissioner