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Comments on BLM's Little Snake RMP Draft Significance Criteria and Assumptions

Dear Jeremy and other members of the Little Snake Planning Team,

Please accept these comments on the BLM's current draft (10/21/05) of the Significance Criteria and Assumptions to be used in analyzing the alternatives in the forthcoming Little Snake Draft RMP. As always, we appreciate the opportunity to participate in this planning process with the Little Snake Field Office and the Northwest Colorado Stewardship and to provide input to your planning and analysis. Thank you for carefully considering the comments we provide here.

General Comments:

Having participated in NWCOS's process of developing consensus around collective suggestions for this document, we support all commentary you have already received from NWCOS. In particular, in the general assumptions section, we are especially pleased that NWCOS recommended, and you approved, a change to include specific reference to the need to analyze cumulative impacts.

Comments by Section:

Soil Resources:

- Significance Criteria: Since adherence to Standard 1 of the Colorado Standards for Public Land Health is an assumption, shouldn't "Violation of BLM Land Health Standards" be a significance criterion?
- Significance Criteria: add a criterion: "Irreparable compromise of the native seed bank found in top soil layers."

Water Resources:

- Assumptions: add an assumption: "Disturbance of particular soil layers, such as Mancos shale, will lead to a larger increase in sediment, salinity, and selenium yield than disturbance of normal soil layers, and therefore impacts on water resources from these layers will be greater."

Vegetation:

- Significance Criteria/Assumptions: how did BLM/Booz Allen Hamilton develop their assertion that sagebrush/grass communities will recover from disturbance within 5-10 years? Without citation or references for this assertion, we can only assume this timeframe was developed with adequate scientific backing, but in general it seems short for any arid vegetation community. In fact, given the much longer timeframe typical of cryptobiotic soil's recovery from disturbance, it is certain that some parts of the sagebrush ecosystem, such as cryptobiotic soil crusts, will take much longer than 5-10 years to recover.
- Assumptions: the assumption that sagebrush reestablishment in disturbed areas would create a vegetative landscape similar to adjacent lands in excess of 20 years" is generally sound, but it can't be safely assumed in areas where cheatgrass has substantially invaded, because cheatgrass so substantially changes vetegative communities that it may take longer than 20 years to fully reestablish the original vegetative landscape in such locations.
- Assumptions: add an assumption: "Weeds will continue to spread from existing weed populations throughout the field office even without the influence of new sources of weed introduction."
- Assumptions: to list of factors attached to the assumption about how "the degree of impact… would be influenced by several factors" add "type of disturbing activity."

Special Status Species:

- Significance Criteria: the criteria outlined here are all very appropriate. We are glad to see them in there, and in the form in which they appear. However, the criteria related to

ACECs:

- Assumptions: the assumption that "management actions outlined for each ACEC… would provide adequate protection of the identified… values within the ACEC boundary" could preclude adequate analysis of the effects of the management actions associated with each ACEC. If it is assumed that the management actions outlined for an ACEC designated to protect a particular natural value, such as a rare native plant community, are adequate to protect that natural value, then there can be no environmental analysis of the effects of those management actions on the very natural value that ACEC is designed to protect. This assumption precludes any judgment of whether the management actions in a given ACEC are appropriate to meet the goal of the ACEC designation, which appears to be the intention of this assumption, but in doing so it also prevents analysis of important environmental effects that those management actions may have. This assumption should be modified to read "Management actions outlined for each ACEC in Chapter 2 *are intended to and may provide* adequate protection of the identified relevance and importance values within the ACEC boundary."

Energy and Minerals:

- Assumptions: the assumption that 100 % of the disturbance from seismic surveying would be reclaimed within the life of the plan is problematic. Many investigations of the effects of seismic surveying would suggest a very long timeline for full recovery of vegetation. In fact, tracks from seismic surveying equipment in cryptobiotic soils are still visible in some places decades after the surveying work is complete. Clearly, this timeline is likely longer than the life of this plan. In addition, disturbance from seismic surveying that occurred a year or two

before the adoption of a new RMP for the Little Snake RA would certainly not be 100% recovered within the life of the plan currently being analyzed.

Livestock Grazing:

- Assumptions: though the assumption that "the impacts [of different classes of livestock in different areas]… are assumed to be similar and would not be discussed separately" may be appropriate in a limited sense, it overlooks the significantly greater impact that livestock grazing of any kind has on riparian areas and other habitat types that are particularly sensitive to disturbance.
- Assumptions: add to the assumption that "construction of range improvements would result in localized loss of vegetation cover…" that such improvements can also facilitate the spread of invasive weeds

Thank you again for the opportunity to provide comments on this document. If you have any questions regarding these comments, please feel free to contact us. We look forward to continued involvement with the RMP process.

Sincerely,

Josh Pollock
Conservation Director
Center for Native Ecosystems