

Oct. 18, 2005

Little Snake RMP: Draft Significance Criteria and Assumptions

CNE Initial Comments by Section:

Vegetation:

- Significance Criteria/Assumptions: where did Booz Allen Hamilton come up with their assertion that sagebrush will recover from disturbance within 5-10 years? They should have adequate scientific backing for the timeline they have chosen. This timeline seems short to us, so we would feel better about supporting it if we knew what evidence was being used to support the numbers in this case.
- Significance Criteria: the line about “widespread replacement of native communities with noxious and invasive weeds to the degree it can’t be easily mitigated” is a good start but has several problems:
 - 1) “widespread” discounts smaller native communities or the early phases of invasions of larger communities, and is subjective anyway
 - 2) “replacement” is too high of a threshold (should be “displacement”)
 - 3) “to the degree it can’t be easily mitigated” is misleading, since such weed invasion will never be easily mitigatedIf this criteria can be revised to eliminate these loopholes, it should be retained
- Assumptions: the assertion that “all management actions associated with the protection of wildlife habitat and cultural resources would benefit vegetation management” is NOT TRUE IN ALL CASES (this assumption would allow vegetation treatments, such as brush beating, roller chopping, or hydro axing, to be considered uniformly beneficial for vegetation, when they may not be beneficial to the vegetation itself in every case—for example, a native rare plant community would not benefit from being “treated” in order to make it into more suitable habitat for deer, or elk, or sage grouse). Therefore, it should either be eliminated or modified to reflect the above concern.
- To the Assumptions list, add the following assumption: “Weeds will continue to spread from existing weed populations throughout the field office *even without the influence of new sources of weed introduction*”

Special Status Species:

- Significance Criteria: the criteria related to “loss of habitat function of habitat value...” (last one) should include “currently unoccupied but potential habitat” as well

Water Resources:

- To the Assumptions list, the following assumption should be added: “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”

Energy and Minerals:

- Assumptions: a concern regarding the line about how 100 % of the disturbance from seismic surveying would be reclaimed within the life of the plan: lots of science (about cryptobiotic soils, desert plant communities, erosion effects of soil compaction, etc.) would suggest a very long timeline for some seismic survey impact recovery—much longer than the life of this RMP...

Livestock Grazing:

- Assumptions: the line about how “the impacts are assumed to be similar for all areas and are not discussed separately” 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 line about how “construction of range improvements would result in localized loss of vegetation cover...” that such improvements will also result in the spread of invasive weeds

By the way, there are several pieces of this draft that seem particularly appropriate and beneficial:

- In the Vegetation Section, the line about Proper Functioning Condition (PFC) violation and BLM Land Health Standard violation is good
- In the Special Status Species Section, the Significance Criteria are all very good. We’re glad to see them in there, and in this form
- In the Fish and Wildlife Section, the lines about “disturbance of any component of a species habitat” and “impacts to nonnative fish and wildlife species” are good