

*Received October 24, 2005*

From: "Jeff Comstock" <jcomstock@moffatcounty.net>  
To <Jeremy\_Casterson@co.blm.gov>  
Date: 10/24/2005 11:58 AM  
cc: "'Kristi Parker Celico'" <kparker@keystone.org>  
Subject: Comments on 10-24-draft assumptions

Jeremy,

p.5 cultural and heritage resources. There is no need for all the bulleted points under the first significance criteria. They may be interpreted policy, but leave out significant points. There is no other place in this document that examples of adverse effects are listed in such a manor. If BLM insists on leaving the examples in, Moffat County has suggested changes for them, to extensive to list in this comment letter, and will submit them separately. The criteria is only listed with an i.e. in places, but not a complete list of examples. Moffat County recommends these be deleted and both assumptions delete the word "indirectly."

p. 7. Lands with or likely to have wilderness character: Moffat County fundamentally disagrees that this category should exist. We recommend eliminating lines 13-22. We have provided detailed and specific lists of influences of man that exist in Vermillion Basin that have not been accounted for in BLM planning documents. We have opposed, challenged, and provided supplemental data regarding the wilderness character inventory data BLM collected regarding vermilion basin. At a minimum, Vermillion Basin should not be considered "lands with wilderness character" and no assumptions or significance criteria should be associated with this classification.

p. 7. Likely to have wilderness character: Replace original language in line 15 and 16. This was hotly debated in Keystone and only one person had problems with the original language, the rest supported it.

p. 7. Add the same language in lines 21-22 back above in WSA classification. This was removed unjustly. It is important to have the ability to have land developments in WSA that do not hinder the ability for lands to be designated wilderness.

p.8 Visual Resources: "Add a assumption that says VRM classes will complement existing uses."