

LITTLE SNAKE CHAPTER 4 COMMENT FORM

NAME	SECTION	PAGE	PARA-GRAPH	LINE	COMMENT
Moffat County	Overall				<p>Not adequate range of alternatives, thus little change is revealed between alternatives when impact analysis is performed.</p> <p>Very very little positive impacts listed. Rethink the tone of entire document. There are so many positive impacts that land uses can add, but this document makes virtually every impact negative. Below are several suggestions for improvement, but we are frustrated that positive impacts aren't reflected since NWCOS discussed this at length and Booze Allen no BLM have incorporated the thoughts. In fact this is Moffat County's umpteenth request for positive impacts that hasn't been incorporated.</p> <p>The Whole Document is unduly weighted toward Wildlife. Lit Cited, and extensive discussion on wildlife exists where no other category has the same attention. We need to work through this imbalance. One-on-one iscussion is necessary here.</p>
	Overall				<p>Huge problem in that Booze Allen's subcontractors have not absorbed the tone of NWCOS participants and the general language in this document is one of "cut and paste" rather than specific to BLM/NWCO's LSFO Issues. For instance: p. 4-179 line 39 says minerals-energy and ROW's will result in long term loss of soil productivity and vegetation diversity. This is standard cut and paste that is not true in this area especially when adequate reclamation will enhance rather than detract from long-term productivity and additional provisions/stipulations are applied to O & G exploration (i.e. Vermillion Basin). Similar themes ring throughout the entire document. Another example: P4-172 line 25-30 does not even address that Elk are creating soil loss and vegetation damage due to the overpopulation in Moffat County, especially in winter grounds. These examples exist throughout the document.</p>
	Sht Term vs Lng Term Uses.	4-179-180	4.9	All	<p>Absolutely Insulting Section: General tone of pedestaling wildlife and hating OHV, O&G and ROW's. Better get balanced here with some talk of the positive impacts.</p>

	Soc. Econ section	4-178			Not CSU's responsibility to describe the impact, it's theirs' to do the soc econ study, but not evaluate the impacts. Suggestion would be to use the similar tone and writup that Dave Blackstun has examples of from Oregon plans etc.
	Irreversible impacts 4.7,4.8,4.9	178		All	Talk about the positive and clarify surface disturbing impacts are not irreversible ... very biased writup toward wildlife not causing any damage.
	Cumulative	170-176		All	All in negative context. Livestock are a tool to increase soil stability not an impairing factor. Elk, Pronghorn, are made out to be positive and all other uses are negative to wildlife. Look at the positive wildlife factors, such as revegetation on disturbed sites, new habitat, all proof by the exiting overpopulation of elk and vegetation AUM. Serious oversight to not address both sides of the wildlife issues and thinking wildlife are all positive. <u>Vegetation Section doesn't even talk about the impacts to managing for DPC's which will increase the positive impact on veg.</u> Please add the positive affects on cumulative impacts when DPC's are reached..
	Lands likely to contain wilderness character	4-99			Moffat County believes 202 of FLPMA does not permit BLM to make a determination that lands will likely contain wilderness character without an inventory. Intimate knowledge of the area by BLM staff does not meet the criteria. We request this section be removed, we request all impacts of disturbance to these areas be evaluated in the context of Multiple Use rather than assuming these areas to be managed as defacto wilderness.
	Soils	4-4	Intro statements 4.3.2		OHV, Fire, Livestock, and equipment are listed as impacting soil, add language reflecting the damage that wildlife populations that are over-objective can cause to soils. (i.e. current Elk situation in winter ranges.)
	Water Resources	4-16	4.3.3.		BLM's biggest impact to water resources around great divide and Maybell is winter wildlife range. Please identify this in addition to the already mentioned issues of fire livestock, and off-stream developments.
	Veg.	4-20			Add the fact that DPC's are goals to achieve will positively add veg. impacts. BLM listed PFC as an assumption but not DPC.
	V eg.	4-26	4.3.4.3		Need to list impacts of achieving DPC on Veg Component in Alt C
	Veg	4-25		40-4r6	Rethink this. Short term gains in forage may deteriorate long term AUMs, but not gradual long term transition of rangeland. For instance, Late seral stage sage brush reduction to add mid seral grasses will not decrease range condition overall. It merely promotes diverse rangeland, especially when Veg treatments are properly planned. In addition, meeting standards and guides will not decrease forage over the long hall. This section is aimed at saying that increasing AUM's is unhealthy for rangelands. The opposite is true in late seral stage ecosystems like great divide. Rewrite to address this.
	Veg	4-29	4.3.4.4	34-	Identify that if WSA's were released and mechanical veg treatments were

				39	applied, vegetation vigor, health, and late seral stage growth would be reinvigorated increasing available forage for wildlife, livestock, etc.
	Wildlife	4-30	Assumptions		Lets not assume all negative, assume achieving DPC will increase habitat. Assume that meeting standards and guides will increase habitat.
	Cultural	4-80	4.3.9		Impacts to cultural resources would be significantly improved if quality modeling efforts were to occur to block release areas of less importance culturally. Modeling efforts will help prevent avoidance practices when "enough" of a resource has been protected (i.e. arrowheads and flint chips) This would have a significant positive impact to cultural resources..
	Cultural	4-81	Line 20-25		106 requires consultation with local governments in addition to Indian tribes. Please so reflect.
	Special Status Species	4-49-50			Once again, there is no mention of positive impacts to species of concern because of recovery programs such as the Black Footed Ferret, the 4 endangered fish, local working groups for sage grouse recover, etc. Please add as a positive assumption and reflect the benefits of enhancement of these programs.
	Special status species	4-62			Good discussion of positive impacts to species.
	Horse area	4-68			Good acknowledgement that range improvements to area will help horse forage..
	Fire	4-74	4.3.8		Add discussion/an assumption that failure to implement cross-boundary management, allowed with the County Fire Plan, with private landowners will provide significant fire management headaches for BLM, ecological objectives may not be met due to logistics of checker-boarded land ownership patterns.
	Wildlife	4-38	4.3.5.1	4-8	Big Sin. Don't use the Blank Footed Ferret for excuse to give special attention to prairie dogs. BFF are NONESSENTIAL EXPERIMENTAL. Let Prairie dogs subside and coexist with other uses. Food source for BFF shouldn't receive special management in the name of BFF sustainability. Then we are no better than the Denver Zoo.
	Special Status Species	4-57	4.3.6.2	32	Again, BFF don't get special attention. They and their food source have to coexist with existing uses. Remove language which tries to give them special protection since the ESA doesn't. The Wolf Creek BFF reintro plan does not pedestal the BFF over Oil and Gas, nor should this RMP.
	ACECs	4-103	4.3.11.12	43	Way underestimated weed problem to suggest case by case. Needs systems level large landscape approach. Re-write to reflect such. Just ask

					the members of the NW CO Weed Partnership. (maybe this goes in the Veg section on weeds. Not sure.
	ACEC's	4-106	4.3.11.14	31	See above comment and suggest that add the working with MoCo weed dept and partnership program to kill weed infestations.
	Wild Scenic River	4-109	4.3.11.16	10	Add an impact to wild and scenic rivers would be the activation of existing water rights for Juniper Cross Mt. Dam. The water rights are still held by the River District and can easily impair WSR designation. See Juniper Water Conservancy District Comments to BLM
	Wild Scenic River	4-111	4.3.11.19	4-11	Must identify the enactment of the Juniper Cross Mt Water Rights would inundate segment 1,2,3, not to mention that BLM would be required to pay damages for any designation (i.e. WSR) that would impair the River Districts ability to utilize their water rights. (see Juniper Water Conservancy District Comments).
	Lands and Reality	4-161		11	Statewide RMP Programmatic Conservation Measures should be summarized. Don't assume they are well understood. Line 26...add the issue of Juniper Water Rights playing a role in any design and siting requirements on new ROW's.
	Transportation	4-162		37-end 4-165 line 14	Don't assume impacts to OHV is when experience is diminished, also discuss impacts are positive when designated trails occur, etc. Identify that seasonal closures ¼ mile from BFF cage would only be for a couple days, not 'seasons' according to Wolf Creek Plan.