

LITTLE SNAKE CHAPTER 4 COMMENT FORM 1

NAME	SECTION	PAGE	PARA-GRAPH	LINE	COMMENT
Vermillion Ranch T. Wright Dickinson					
	Assumptions	4-3	4.1	8	Should also include a statement or Assumption that cumulative impacts of Blm actions on others will be disclosed i.e. Impacts to permits have direct nexus to private land open space retention (they have not been in this document)
				14	S&G are also applied to ALL USES and USERS
	Data		4.2	36	I question that statement as there is a complete NRCS soils inventory for Moffat county. BOB Grub did it.
	Impacts to soils	4-4	4.3.2	32	I dispute the assumption that livestock grazing causes blanket impacts or even localized ones since it will be managed. There should at least be an assumption that recognizes the positive contributions to soils. And wildlife impacts should also be seen in the negative as well as the positive
				35	The author seems to forget that prairie dogs and old growth PJ create very erosive situations for soils
		4-7,4-13		41 and all the other place Biological crusts are referenced	The author implies that soil surface crusts (Biological)are good, It is in dispute within the scientific community and highly controversial (Dr. Wayne Burkhart) and I certainly dispute it, life time knowledge of the area says breaking up the crust leads to vegetation establishment and less soil erosion.
		4-8		23	Strike IE SRMA's or designated facilities This implies that these designations are the only way to accomplish the goals which is incorrect, managing recreation is the issue not designations
		4-9	4.3.2.2	14,30,37	The assumption is wrong and disingenuous that protections for fragile soils would be less because the Standards are applied across all alternative equally
		4-10		15,29,30	Same as above
	General comment				This notion of the need for fragile soils designation is wrong the Standards take care of it if the BLM dose its job. Why is the answer always another

					designation that fragments management of the landscape? There are not enough acres of treatment in any of the alternative to give a substantive range to analyze and none that restores the ecological balance destroyed by 60 years of fire suppression
		4-11	4.3.2.3	15-20	See comment immediately above
		4-13	4.3.2.4	33 and the entire section	There are no analysis of the impacts from non motorized recreation in this section or any of the others for that matter Why I believe that hiking biking and others forms can have significant impacts and should be analyzed appropriately
		4-15		10-24	Why is there no mention of the significant benefit that surface disturbing activities can have to enhance the erosion control and that they will be lost in Alt. D. The same should be said of the other alternatives
				27-35	I support the authors wild horse conclusions in these lines
		4-16		4	I disagree with the assumption that SRMA's are need to manage recreation these working landscapes should not be fragmented by designations
	Water resources	4-16 4-17	4.3.3	General 9 socio econ	Nowhere is there an assumption that the BLM will mange the watersheds for water yield There should be as this has a significant impact to the Yampa and Green river valleys and the state of Colorado in water compact deliveries. Because of the unnatural state of woody vegetation the watersheds are dryer than historical, none of the alt. analysis this or the what is required to restore them to an ecological balance
		4-17		41-42	Again disingenuous statement as the Standards apply equally
		4-19	4.3.3.4	24-33	This wordings assumes that a minimization of disturbance is good see the immediate 2 comments above
	Impacts to Vegetation	4-21	4.3.4	6-7	20years is wrong there should be a range based on elevation and land type say 7-25
				8	Is really wrong! First you meet Livestock grazing preference and then wildlife and horses must live with the rest or manipulate the habitat to sustain the desired population, which must be based on the key or most impacted vegetation species since wild life and horse can't be herded.
				11-12	I disagree with this assumption it violates at least one of the Standards for vegetation
				26-42	General comments this paragraph fails to describe the unnatural state of late succession over mature monocultures currently existing and the need to restore these lands
				44-46	This assumes that restricting surface disturbing activities are preferred and that there are no benefits from them as well as existing diversity and serial succession is good which it is not

		4-22		44-46	The socio econ will be impacted by the failure to create a DPC that maintains the economic health of the dependant community
		4-25	4.3.4.2	40-46	This is disingenuous because the Standards would not allow impacts to other resources. There need to be more acres restored under this Alt. B to establish a range and to provide Full grazing preference AUM that can be accomplish within the natural range of variability and this Alt. should be analyzed as such
		4-26		24-30	Again this is disingenuous to say localized vegetation loss WOULD occur with multiple use of WSA"s or that more human use would occur without W&S river designation this whole paragraph is anti multiple uses!
		4-27	4.3.4.3	36-44	This paragraph should say that we will create a DPC that maximizes Diversity in age and species of plant communities and uses introduce varieties where appropriate so tat we can sustain the livestock wildlife and special status species. To do it we have to treat way more acres than currently in this Alt.C.
		4-29	4.3.4.4	6-18	(The emphasis here is to use grazing as a tool to the benefit of others) however it fails to disclose that it may harm the viability of the individual grazing permittees if their needs are not meet as well.

LITTLE SNAKE CHAPTER 4 COMMENT FORM 2

NAME	SECTION	PAGE	PARA-GRAPH	LINE	COMMENT
		4-29		general	There is no mention or analysis of Adaptive management Why?
	Impacts to fish and wildlife	4-30	4.3.5	13	The word WOULD should be changed to COULD as all disturbance is not bad
				19-20	This assumption is confusing and I believe wrong!
				21	This assumption is without basis in fact and is disingenuous
				38	The majority of Range improvements increase habitat that is why they are call range improvements this whole section lacks balance and recognition of any positive contributions of disturbance or habitat manipulation
		4-31		2-3	Restrictions to fish passage protect the native cut throat trout from the non natives. Why is the issue of non native fish not analyzed in this section
		4-33		32-37	Alterations of local hydrologic features can have beneficial impacts and should be acknowledged here.
		4-35		The entire page	This entire page is anti livestock very begrudging of any benefits that range improvements provide to wildlife and riparian species, or erosion control This isn't wilderness folks this is a working landscape please describe it as such The prior assumption that habitat exist to sustain existing wildlife populations is directly attributable to livestock grazing improvements at least you could acknowledge it
		4-37		4-6	That was the most loquacious section to get to this simple sentence with which I agree
		4-38		4-8	The BFF plan says all uses get to occur live and let live not block avoidance.
				20-23	Disingenuous as the standards apply to all and oil gas has conditions of approval
			4.3.5.2	14-19	This one is good
		4-42		30-35	There is a soil standard so fragile soil concern is disingenuous
				37-41	The acreage in 43-45 disputes this statement
		4-43		22-38	Alt B did not have protection for lands with wilderness character
		4-45		30-36	Acreage treatments not larger enough to meet goals and objectives
				44-50	Goals and objectives for Sustainable ranching will not be met without increasing acreage vegetation treatments and utilizing a DPC that supports ranching. As usual benefits of Reserve common allotment Idea is over blown

		4-48	4.3.5.4	17-23	This alt. would be very detrimental to livestock grazing because the emphasis on special status species would decrease AUM's
				33-39	Could have detrimental affect on permittees being used as a tool with regard for their sustainability
				49	Dose this eliminate wind energy? If so I object
	Impact to special status species		4.3.6	General	This section dose not cover the potential disruptive impact that these species could have on all segments of the economy and which species are most likely to be disruptive.
		4-52		11-13	Why is grazing not included if wild horse is and why the impacts to grazing are not included? I think socio/econ would in fact be affect because of impacts to recreation grazing and O&G the three largest segments of the economy
		4-53		16	The Black footed ferret is cover by experimental status is this plan trying to apply more stringent requirements if so I am in opposition
		4-55		3-4	Fire suppression would cause more than localized habitat deterioration it is now range wide because of past policy and must be acknowledge as a detrimental fact to grouse at least if not to others.
				20-27	You got this right at least
		4-56	4.3.6.2	12	That's wrong because recreation must comply with standards and blm must do it job
		4-57		30-32	BLM has Ignored the county and NWCOS no one agreed to increase the protections for ferrets beyond the experimental status this is wrong
			4.3.6.3	General	blm must not override the Experimental status of the ferrets and if they are they must disclose the impacts to all users
		4-61		4-6	The impacts by Statewide programmatic RMP conservation to socio/econ and grazing and other uses are not described. Why?

LITTLE SNAKE CHAPTER 4 COMMENT FORM 3

NAME	SECTION	PAGE	PARA-GRAPH	LINE	COMMENT
		4-61	4.3.6.3	General	Same comment that C is defeating the experimental non essential rule and the agreement with the community on ferrets and their impacts to uses
				16-46	Is a cut and paste excuse to increase regulations this is completely in opposition to NWCOS goal of simplification and emphasis of adaptive management
		4-62		16-49	Fails to disclose that treatments won't meet goals and objectives because they are too minimalist and are not structured to achieve real restoration
		4-66		19-22	Question that results would be the same as C since D will be restricted by VRM's special status species etc. emphasis
				26-29	What dose this mean? Will they be allowed or not and with what restrictions these have great impacts which this paragraph fails to disclose need I say disingenuous
		4-67	4.3.7	General	Wild horse impacts to the resource are not disclosed and that their herd area is not a wilderness but a working landscape and that the population AML is too high for year round use
	fire	4-78	4.3.8	12-15	The release of WSA's would facilitate the use of proscribed fire and enhance range lands
		4-79		10-13	And we loose the benefits described above
			4.3.8.4	45-47	agree
			4.3.9	General	This RMP should develop a systems approach to archeology The lack of which is creating unnecessary expense and avoidance for project proponents and nothing of substance is being learn from the archeology None of this is disclosed herein
		4-81		38-47	The impacts by livestock are completely over blown wonder why horses and big game aren't no bias is here?
		4-82		47-50	? Why livestock not included and I believe socio/econ is impact ed
		4-83	4.3.9.1	35-38	overblown
		4-84		1-4	overblown
		4-85	4.3.9.2		This is good but it is not intended to preclude use before inventories but to forecast and have appropriate BLM funding to determine what's important and how to protect and interpret it. If this is not conducted in this manor BLM must disclose impacts to uses and economy
		4-88	4.3.10	33-35	Finally grazing doesn't impact something I was begin to think I was paranoid

		4-92	4.3.10.3	7-8	Why is there no mention of impacts from non motorized recreation mountain bikes and hikers can have impacts why no discloser
	Special management designations	4-96	4.3.11.1	13	Disingenuous assumption since congress released them
				25-28	Significant impacts because of WSA's apply to all the values because of manage fragmentation and lost flexibility
		4-97	4.3.11.3	35-39	There should be a list of all of positive benefits from release flexibility forage ecological health this is currently too one sided
		4-98 4-99	4.3.11.4	37-40 10-16	Restricting surface disturbing activities could jeopardize the sustainability of 5 ranching operations and directly lead to the development of private land open space
	Lands with wilderness character	4-99	4.3.11.6	general	I strong object to the BLM's determination that there are lands with wilderness character with out the required inventory process and ignoring all of the comments to the contrary from Moffat County and Vermillion Ranch. At a minimum Alt B should have No lands with wilderness characters as the Alt. were to have the full Range per NWCOS
				42-45	No impacts from forestry or socio econ you have got to be kidding
		4-101		44-48	Restrictions that impact livestock grazing adversely will directly place private land in development
		4-102	4.3.11.10	4-9	Same as above
			4.3.11.11	35-37	If no impacts from forestry why not grazing?
		4-104	4.3.11.13	35-39	This is disingenuous as there is a standard for sensitive species which would protect prairie dogs
		4-105		14	Neither this section nor 4.3.6.2 describe impacts pro or con to grazing
			4.3.11.14	General	The Irish canyon ACEC should be removed for the same reason as the others. The rational is the same for all as the values can and would be protected by other means

LITTLE SNAKE CHAPTER 4 COMMENT FORM 4

NAME	SECTION	PAGE	PARA-GRAPH	LINE	COMMENT
		4-106	4.3.11.14	37-38	Still anti livestock There are positive benefits to improvements for grazing and they should be disclosed
		4-108		General and 29	ACEC in D directly threatens the sustainability goal and objective of ranching and imperils private land open space
	Wild and scenic		4.3.11.16	General	Incorporate juniper water conservancy comments here by reference
			4.3.11.19	23	Must disclose the impacts of VRM I on other uses this fails to do so
				General	Fails to mention that there is non reasonable access to Beaver creek other than across private or state lands
	VRM's	4-113	4.3.12	General	Completely one sided lacks balanced description of the impacts of VRM classes on other land uses and corresponding socio/econ impacts Fails to reflect working landscape nature of resource area
		4-118	4.3.12.3	46-48	Threatens sustainability goal of ranching and could impact private open space
		4-119		2	Same as above however D would be certain to decrease grazing
	livestock	4-129	4.4.2	general	This section underestimates the adverse impacts by soil water, vegetation, archeology Paleo, VRM's Special status species, Wildlife wild horses and completely fails to address impacts by wilderness and lands with wilderness characteristics or back country designations
				27	This figure is irrelevant since it is not how AUM's are calculated
				30	This assumption is disingenuous as earlier assumptions said adequate capacity for wildlife existed. AUM's should go to livestock until full preference by allotment is achieved and only then be allocated to whom ever contributed to AUM creation
		4-131		20	Fails to disclose high cost to permittees
				General	Fails to disclose impacts of VRM's on grazing in general pro or con
		4-132	4.4.2.2	37	Alt B was supposed to fully restore forage base for preference AUM's Treatments are too small
		4-134	4.4.2.3	29	Disingenuous as vegetation treatments would be restricted by wildlife and special status species
		4-135		9	And restrict range improvements and loss of forage enhancements
		4-136	4.4.2.4		
			4.4.3	general	Fails to analyze the impacts of non motorized recreation which will certainly

					increase over the life of the plan
		4-146	4.4.3.3	17-18	There was no section 201 inventory done on Cold springs and therefore it cannot be considered to have wilderness characteristics
		4-155	4.4.4	28-32	So grazing impacts forestry since when did cows start eating PJ
		4-156		21	All forms of business relying on forest products are similarly affected
				28-31	Disingenuous without treatment insect, disease and unnatural fuels build up threaten forest health
		4-157	4.4.4.3	13-16	Same as above
		4-166	4,5	17	All the socio econ is lacking in all sections CSU dose the numbers but Booz and BLM must disclose the impacts the impact
	Cumulative impacts		4.6.3	general	Woefully inadequate
		4-176		Livestock	Completely ignores cumulative impacts of BLM decisions adverse to grazing threaten private land habitats and open space
		4-178	4.7	general	What are they and what is the value lost
			4.9	general	Not balanced one sided preservationist