

**WORKSHEET FOR OCTOBER 19 NWCOS MEETING ON
ASSUMPTIONS AND CRITERIA FOR THE IMPACT ANALYSIS**

Facilitator Notes:

- *Please ensure you are looking at the October 14 version of the Assumptions and Criteria. This document can be found at: http://nwcoss.org/Resources/BAH/Materials/LS_RMP_DRAFTsignificance_criteriaassumptions_14Oct05modified.pdf.*
- *We will address everyone's top three concerns at the meeting prior to addressing other ideas.*

Name: Reed Morris (with Suzanne Jones, Nada Culver and Luke Schafer)

Your first (greatest) concern

Topic: Lands Likely to Have Wilderness Character

Page: 7

Line: 15

Your concern with the text as written:

There are different thresholds for measuring “significant” impacts on the same resource—wilderness character—depending on where it is found (inside our outside a WSA). I have concerns with this differential treatment based on what “category” of wilderness each area is in be it “WSA” or “likely to have wilderness character.” It is also unclear under the current scheme which category would contain Vermillion Basin. This highlights the need for uniform treatment and impact analysis for wilderness character.

Your recommended new language:

Management decisions that allow degradation of the individual wilderness characteristics (naturalness or outstanding opportunities for solitude or primitive recreation) to the degree that any or all of these values would no longer be present within the area.

Or

Management decisions that impair the ultimate eligibility of such areas for preservation as wilderness

Similar language as I would recommend for Wilderness Study Areas:

Management decisions that “impair the suitability of such areas for preservation as wilderness” in areas designated as WSAs.

Your second concern

Topic: Wilderness Study Areas

Page: 7

Line: 3

Your concern with the text as written:

The significance criteria assume development and include the additional line: “so that it no longer meets the criteria for designation.” This language does not accurately capture FLPMA or the IMP, which simply states that lands within WSAs are to be managed “*so as not to impair the suitability of such area for preservation as wilderness.*” I would end the significance criteria there.

In short, simply impairing the wilderness criteria is the significant impact, not adding the additional subjective element of the degree in which the entire area would fail to meet criteria for designation.

Your recommended new language:

Similar to that for ACECs--

Management decisions that “impair the suitability of such areas for preservation as wilderness” in areas designated as WSAs.

Your third concern

Topic: Wilderness Study Areas

Page: 7

Line: 11

Your concern with the text as written:

While this assumption is partially true, that such developments “may” be compatible with WSA management, this statement doesn’t address some of the threshold issues as to whether or not such activities actually would be compatible. In addition, the IMP does not consider fences to be a “minor” management development, rather one that, in most cases, would be considered “permanent,” and must both “truly enhance wilderness values” and be “substantially unnoticeable.” Weed treatments are not necessarily considered “minor” actions either, and (unless otherwise grandfathered) are would be allowed only when there is “no effective alternative and when control of the noxious weed or exotic plant is necessary to maintain the natural ecological balance within a WSA or portion of a WSA. Hand or aerial seeding may be done to restore natural vegetation.”

Your recommended new language:

Since there is one already assumption that deals one reading of the IMP, I would propose addition a couple of other assumptions:

Preservation of wilderness values within a WSA is paramount and should be the primary consideration when evaluating any proposed action or use that may conflict with or be adverse to those wilderness values.

If a facility must be constructed within a given geographic area, it would be in the best interest for protecting wilderness values to construct the facility outside the WSA. Other alternatives should always be considered before deciding to allow a use or activity within a WSA.

I would amend the existing assumption at line 11 to read: (taking language from the IMP)

To the extent not otherwise grandfathered...

control of noxious weeds and individual exotic plants such as tamarisk when there is no effective alternative and when control of the noxious weed or exotic plant is necessary to maintain the natural ecological balances within a WSA or portion of a WSA. Hand or aerial seeding of native species may be done to restore natural vegetation.

New, permanent livestock developments may be approved if, after completing a similar analysis as required in Section 2.a, above, they truly enhance wilderness values, and the developments are substantially unnoticeable. New, permanent developments must not require motorized access if the area were designated as wilderness.

Fourth Concern

Topic: Energy and Minerals

Page: 8

Line: 31

Your concern with the text as written:

--a substantial reduction in development is covered under the first criteria already.

--This would unnecessarily add an additional criteria that could capture a "significant" impact in areas that might have little to no potential for development anyway.

--the significance criteria is tied to markets and activities far beyond the scope of the RMP (such as the market price of natural gas).

--Vagueness and subjectivity are not uncommon throughout the document, but we have particular concerns with these criteria.

Your recommended new language:

If not delete the criteria as redundant, then provide analysis of significant thresholds of “cumulative management actions” and activities for other resources such as habitat, air, water, sensitive species, etc.

Other concerns in no particular order.....

Your concern with the text as written:

- **General Assumptions:** includes only “potential” (future?) actions and not “past, present and future actions.” Should also include a point on mitigation measures that states “*effectiveness of mitigation measures must be described and analyzed in detail in order to justify reliance on mitigation for reducing environmental impacts.*”
- **Soil Resources:** should include discussion of steep slopes.
- **Water Resources:** *should included “streams, wetlands or riparian areas”*
- **Reclamation Generally:** we are generally concerned with the timeframes BLM has outlined for return of each vegetation type (seems short).
- **Wildlife:** have great concern with assumptions that management actions that could be the direct result in loss in substantial numbers of wild life are per se “not significant.” Other habitat impacts should be addressed as well...
- **Energy and Minerals:** should include assumption for BMPs, stating “BLM will encourage operators to employ best management practices (BMPs) and will incorporate appropriate BMPs into proposed APDs and associated on and off-lease Rights-of-Way approvals after NEPA evaluation.”
- **And others...**

Your recommended new language:

